

# Data Privacy Statement

## Websites

## Document information

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# Data Privacy Statement Websites

Below you will find information about what personal data we process, for what purpose, on what basis and for how long:

## 1 Our contact details and general information about how we process data

### 1.1 Name and contact details of the controller

The controller responsible for the collection and use of personal data under data protection law is

**PTV Planung Transport Verkehr GmbH**

Haid-und-Neu-Str. 15

76131 Karlsruhe, Germany

[info@ptvgroup.com](mailto:info@ptvgroup.com)

### 1.2 Data protection officer for the controller

You can contact our company data protection officer as follows: [data-protection@ptvgroup.com](mailto:data-protection@ptvgroup.com)

### 1.3 General information on the legal basis for the processing of personal data

In general, the following applies to our processing of personal data:

- To the extent that we obtain your consent for the processing of personal data, Article 6 (1) (a) of the EU General Data Protection Regulation (hereinafter referred to as the GDPR) will serve as the legal basis for the processing of personal data.
- For the processing of personal data necessary for the performance of a contract with you, Article 6 (1) (b) GDPR serves as the legal basis. This also applies if the processing is necessary to carry out pre-contractual measures, such as orders, quotations, contract negotiations, or even if you have already registered but have not yet accepted the terms of use on which our services are based.
- If the processing of personal data is necessary to fulfil a legal obligation to which we are subject, Article 6 (1) (c) GDPR serves as the legal basis. This is the case, for example, with existing legal obligations to retain and archive certain data (particularly for tax and commercial reasons).
- In the event that your vital interests or those of another natural person require the processing of personal data, Article 6 (1) (d) GDPR will serve as the legal basis. However, this should not happen with our services.
- If the processing of your personal data is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us, this will be done on the legal basis of Article 6 (1) (e) GDPR. This legal basis is not relevant for our services.

- If the processing is necessary for the purposes of the legitimate interests pursued by us or by a third party and your interests, fundamental rights and freedoms are not overridden by these interests, Article 6 (1) (f) GDPR serves as the legal basis for the processing.

## 1.4 General information about the deletion of data and the retention period

As a general rule, we will delete or block personal data as soon as the purpose for which it was stored no longer applies. Data may also be stored where required by European or national legislators in EU regulations, laws or other rules to which we are subject as a data controller. The data will also be blocked or deleted at the end of a retention period prescribed by the aforementioned standards, unless further storage of the data is necessary for the conclusion or performance of a contract.

In concrete terms, this means that:

If we process the personal data on the basis of **consent** to data processing (Article 6(1) (a) GDPR), the processing ends with your revocation, unless there is another legal basis for processing the data, which is the case, for example, if we are still entitled to process your data for the purpose of fulfilling the contract at the time of revocation (see below).

If we process the data on the basis of our **legitimate interests** (Article 6 (1) (f) GDPR) in the context of a prior assessment, we will store the data until the legitimate interest ceases to exist, the assessment comes to a different conclusion or you have effectively objected in accordance with Article 21 GDPR (see the visually highlighted "Reference to specific right of objection" under Section 3).

If we process the data to **fulfil the contract**, we will store the data until the contract has been finally fulfilled and processed and no further claims can be asserted under the contract, i.e. until the limitation period has expired. The standard limitation period under Paragraph 195 of the German Civil Code (BGB) is three (3) years. However, certain claims, such as claims for damages, only become statute-barred after 30 years (see Paragraph 197 BGB). If there is a legitimate reason to believe that this is relevant in an individual case, we will retain personal data for that time period. The above limitation periods begin at the end of the year (i.e. 31 December) in which the claim arose and the creditor became aware, or should have become aware without gross negligence, of the circumstances giving rise to the claim and the identity of the debtor.

Please note that we are also subject to statutory **retention obligations** for commercial, tax and accounting purposes. These require us to retain certain information, which may include personal information, for a period of six (6) to ten (10) years as proof of our proper

business or accounting practices. These retention periods take precedence over the deletion requirements set out above. Retention periods also begin at the end of each year, i.e. on 31 December.

## 1.5 General information on the sources of personal data

The personal data we process is primarily obtained from the data subjects themselves, for example when they

- as users of our website, transmit information, such as the IP address, to us or our web server via the web browser and their end device (e.g. a PC, smartphone, tablet or notebook),
- have a customer account with us or have a customer relationship with us,
- request information material or a quotation from us as an interested party,

- request information material, press releases, statements or the like as members of the press, supply us with goods as agreed as suppliers or provide us with services or similar as business partners.

In exceptional circumstances, the personal data we process may also originate from third parties, for example where an individual is acting on behalf of a third party.

## 1.6 General information on the recipients or categories of recipients of personal data

Your personal information will only be shared or transferred to third parties if this is absolutely necessary and permitted for the purpose in question. We explain to whom we share data and for what purposes in connection with the data processing described below or, in the case of transfers to third countries (other EU or EEA countries), additionally in this Data Privacy Statement.

- Categories of recipients can generally be:
- Service providers,
- Suppliers, business partners,
- Accounting, tax consultants.

## 1.7 General information on the purposes of data processing

Depending on the category of data involved, we process personal data for the following purposes and on the basis of the relevant legal basis of the General Data Protection Regulation (GDPR):

### 1.7.1 User data

We collect and process information from users of our website on a non-personalised basis. It is not possible for us to associate the information with specific individuals. The IP address is only processed in anonymised form. If, in exceptional cases, personal data is involved, we process it to protect our legitimate interests on the basis of Article 6(1) (f) GDPR. Our legitimate interests in this sense include our interest in the security and integrity of our website and the data on our web server (in particular fault and error detection and tracking of unauthorised access), as well as marketing interests and interests in statistical surveys (to improve our website and our services and offers). If we do engage in such data processing, we will have first weighed the interests involved and come to the conclusion that the particular data processing is necessary to safeguard the aforementioned legitimate interests and does not override your interests or fundamental rights and freedoms requiring the protection of personal data.

### 1.7.2 Prospect data/data of press representatives

Where we process data from prospective customers or members of the press, we only do so if they enter the data in an input field, by e-mail or otherwise and send it to us for the purpose of making an enquiry. This input is always voluntary. We will only use this information to process the enquiry. The processing of the data voluntarily provided to us for the purpose of informing you about our services is carried out as pre-contractual processing pursuant to Article 6 (1) (b) GDPR and/or on the basis of the consent you have given by transmitting the data in accordance with Article 6 (1) (a) GDPR.

### 1.7.3 Customer data

We process the data of our customers for the purpose of contract initiation and contract processing in accordance with Article 6 (1) (b) GDPR or, in the case of a customer account or the existence of consent, (also) in accordance with Article 6 (1) (a) GDPR on the basis of consent given, e.g. in the context of registration/login.

### 1.7.4 Supplier data/business partner data

We process the data of our suppliers and business partners for the purposes of contract fulfilment in accordance with Article 6(1) (b) GDPR and/or on the basis of consent given in accordance with Article 6(1) (a) GDPR. This also applies to processing that is necessary for the performance of pre-contractual measures (e.g. in connection with the preparation and negotiation of offers).

## 1.8 Encryption of the website and communication

All protected areas and forms on the website and thus the data transmissions via these are encrypted according to the SSL standard (HTTPS).

## 1.9 Transfer of personal data to a third country (outside the EU/EEA)

Under certain circumstances, personal data may also be processed outside the EEA (European Economic Area) and thus in so-called third countries.

In section 2 of this privacy policy, you can see exactly which providers may transfer data to third countries in the description of the data processing of the respective tools.

This may also be a country for which there is currently no adequacy decision by the EU, i.e., a country in which the level of data protection is not recognized as equivalent to that of the EU, although we always strive to transfer data only to secure third countries.

For the USA, there is an adequacy decision by the EU in accordance with Art. 45 (1) GDPR, which certifies that the USA has a sufficient level of data protection, meaning that data transfers to the USA are generally permissible. The prerequisite for this is that the third-party providers from the USA have certified themselves under the EU-U.S. Data Privacy Framework (DPF). This is generally the case for the US providers we have selected. This means that data transfers to these third-party providers are permitted without further ado.

All companies for which a transfer to a third country is being considered and which may transfer personal data to a third country for which there is no EU adequacy decision, or US companies that are not certified under the EU-US Data Privacy Framework (DPF), have entered into a binding agreement with the EU Standard Contractual Clauses (EU SCC). Data Privacy Framework (DPF), have, through a binding agreement of the EU Standard Contractual Clauses (EU SCC, cf. Art. 46 (2) (c) GDPR) with us and by agreeing to additional data security measures, sufficient guarantees for data transfer within the meaning of the GDPR and the European Court of Justice (ECJ) and subject themselves to a regulatory framework that is fundamentally comparable to the EU level of data protection. Data transfer to these companies is therefore generally permissible (cf. Art. 44 ff. GDPR).

In addition, in the case of order processing with these companies, corresponding order processing agreements have been concluded to secure the data and our rights to issue instructions.

## 1.10 Contact via e-mail, fax and telephone

There are a number of ways you can contact us. You can also find an e-mail address, telephone number and fax number on the website. Even if you e-mail, call or fax us, we will inevitably process your personal data. This is because at least the personal data transmitted by e-mail, fax or telephone will be stored by us or our systems.

This data will not be shared with third parties. The data will only be used to process the conversation.

### 1.10.1 Purposes of data processing

The processing of personal data sent to us by e-mail, fax or telephone is for the purpose of processing your contact and request. We will need your e-mail address, fax number or telephone number in order to reply to you. This also constitutes a legitimate interest in processing the data.

### 1.10.2 Legal basis for data processing

The legal basis for the processing of the data is your consent pursuant to Article 6 (1) (a) GDPR, which you have given by actively contacting us, otherwise our legitimate interest in communicating with you pursuant to Article 6 (1)

(f) GDPR. If the purpose of the contact or your request is the conclusion of a contract, the legal basis for the processing is Article 6 (1) (b) GDPR (taking of pre-contractual measures).

### 1.10.3 Storage duration

The data will be deleted as soon as it is no longer necessary to fulfil the purpose for which it was collected.

For personal data sent by e-mail, this is generally the case when the respective conversation with you has ended and we have waited for a waiting period of up to 6 months to see whether we may need to revisit your request or the details of the communication. The conversation ends when it can be concluded from the circumstances that the matter in question has been conclusively clarified.

Fax data is stored separately from print data in the fax machine memory. Once the fax has been printed, the memory is freed up to receive and store the next fax. Parts of the fax can be temporarily stored in the machine's memory after printing, until they are overwritten by the next fax received. This usually results in the data being automatically deleted after 1-2 weeks. If it is a computer fax, we will receive your fax as an e-mail and the information about e-mails will apply accordingly.

When you make an incoming or outgoing call to us, your telephone number or your name/company name as registered with your telephone company, together with the date and time of the call, is stored in our telephone system in what is known as a ring buffer, which overwrites the oldest data with new data. This usually results in the data being automatically deleted from the phone system after approximately 3-4 months.

The communication may be subject to a commercial or tax law retention obligation, which will then take precedence (see above under "Data deletion and retention period").

### 1.10.4 Right of objection and removal

You may at any time revoke your consent to the processing of your personal data or object to the further processing of your data on the basis of legitimate interest (see reference to the specific right of objection in Section 3 of this Data Privacy Statement). In this case, the conversation cannot be continued.

You may revoke your consent or object to further processing of your data by sending us an informal message (e.g. by e-mail). Any personal data collected in the course of contacting us will then be deleted, unless it is subject to a specific retention obligation, in which case it will take precedence.

## 1.11 Essential information on joint responsibility within the PTV Group

PTV GmbH and its subsidiaries belong to a group of companies within the meaning of Art. 4 No. 19 GDPR (hereinafter: "PTV Group"). The PTV Group consists primarily of PTV GmbH and its subsidiaries. All companies of the PTV Group relevant to you can be found here. PTV GmbH is the parent company of the PTV Group and provides a range of central services (such as IT infrastructure, cloud services), products, and systems for its subsidiaries. For such services and systems, there is joint responsibility within the meaning of Art. 26 GDPR between PTV GmbH and the respective subsidiary.

The joint data processing serves in particular the purpose of processing the data centrally by PTV GmbH in order to simplify and standardize internal processes, as well as to avoid duplicate or multiple data storage and data processing and the associated security risks, thereby ensuring the security and integrity of the data through the possibility of central security measures. Another purpose is to be able to provide PTV Group customers with services and products faster and better than would be possible for the individual companies of the PTV Group.

Within the framework of joint responsibility for data processing, PTV GmbH and the other companies of the PTV Group have each concluded a contract in accordance with Art. 26 GDPR. This agreement essentially stipulates that the party that primarily influences and controls the processing of personal data is responsible for ensuring that the processing of this personal data complies with the GDPR (where applicable) or the applicable data protection law. This includes responsibility for fulfilling the information obligations towards the data subjects and for fulfilling the rights of the data subjects in accordance with Articles 12 to 22 GDPR.

It has also been agreed that each party is solely responsible for the data processing carried out by it, i.e., it independently assumes all rights and obligations arising therefrom, including the processing of the rights of the data subjects.

With regard to the transfer of personal data to countries outside the European Union/European Economic Area for which there is no adequacy decision by the EU Commission, the agreement includes, where necessary, additional data security measures in addition to the current EU standard contractual clauses.

If one party clearly controls and carries out the data processing in question, data subjects can contact this party directly using the contact details provided and published. However, data subjects can assert their rights under Articles 15 to 22 GDPR against each of the joint controllers.

## 2 Scope of personal data processing via our websites

We collect and use users' personal information when they use our website only to the extent necessary to provide a functional website and our content and services. The collection and use of personal information from our users is generally only done with the user's consent. An exception to this is where prior consent cannot be obtained for objective reasons and/or the processing of the data is permitted by law.

This website is hosted by an external service provider (hosting provider). Personal data collected on this website is stored on the host provider's servers. This may include IP addresses, contact requests, meta and

communication data, contract data, contact details, names, website access and other data generated through a website.

The hosting provider is used for the purpose of fulfilling the contract with our potential and existing customers (Article 6 (1) (b) GDPR) and in the interest of a secure, fast and efficient provision of our online offer by a professional provider (Article 6 (1) (f) GDPR).

Our hosting provider will only process your data insofar as this is necessary to fulfil the service obligations and to follow our instructions with regard to this data.

The website is hosted in Germany by UEBERBIT GmbH, Rheinvorlandstraße 7, 68159 Mannheim, Germany, <https://www.ueberbit.de/>.

We have entered into a data processing agreement with the hosting provider pursuant to Article 28 (3) GDPR.

## 2.1 Website hosting and log file creation

For technical reasons, our system automatically collects data and information each time you access the website. These are stored in the server's log files. These are the following:

- Date and time of access,
- URL (address) of the referring website (referrer),
- Pages accessed by the user's system through our website,
- User's screen resolution,
- File(s) retrieved and success message,
- The amount of data sent,
- The user's Internet service provider,
- Browser, browser type and version, browser engine and engine version,
- Operating system, operating system version, operating system type, and
- The anonymised IP address and the user's Internet service provider.

For example, we use the IP address to control the language settings of the website.

The data will be processed separately from other data. This information will not be combined with any other personal information about the user. It is not possible for us to associate this information with any particular individual.

### 2.1.1 Purposes of data processing

The temporary processing of the data by the system is necessary in order to deliver the content of our website to the user's computer. For technical reasons, the user's IP address must be stored for the duration of the session.

Log files are kept to ensure the functionality of the website. We also use the information to improve our services and website and to ensure the security of our information technology systems.

## 2.1.2 Legal basis for data processing

The temporary storage of data and log files is based on Article 6 (1) (f) GDPR (legitimate interest). Our legitimate interest in processing the data is for the purposes set out above.

## 2.1.3 Storage duration

The data will be deleted as soon as it is no longer necessary to fulfil the purpose for which it was collected. In the case of the collection of data for the provision of the website, this will be the case at the end of the session. If the data is stored in log files, it will be deleted after no more than seven days. Further storage is possible. In this case, users' IP addresses are deleted or anonymised so that it is no longer possible to identify the calling client.

## 2.1.4 Right of objection and removal

The collection of data for the provision of the website and the storage of data in log files is absolutely necessary for the operation of the website. Consequently, there is no possibility of objection on the part of the user. However, the user can stop using the website at any time and thus prevent the further collection of the aforementioned data.

## 2.2 Use of cookies by us and third parties

We use cookies when you access individual pages. These are small text files stored on your device (PC, smartphone, tablet, etc.). When you visit a website, your browser may store a cookie. This cookie contains a unique string of characters that allows the browser to be uniquely identified when the website is visited again.

Cookies are used to enable the use of our website or to ensure the security and integrity of the website (essential cookies) or to make the website more user-friendly (non-essential cookies).

Our content management system (Typo3) also uses technically necessary cookies to enable functions such as logging into the administrator area. The setting of cookies is then necessary in order to recognise logged-in visitors.

Third-party cookies may also be used. These cookies may also allow analysis of the user's browsing behaviour. If this is the case, we will inform you separately in this Data Privacy Statement or in specific Data Privacy Statements directly in the information about the relevant third-party tools (such as analytics tools, plug-ins, etc.). For example, analysis tools (such as Google Analytics) set their own cookies for analysis purposes.

When you access our website, you will be informed about the use of cookies and your consent to the processing of the personal data used in this context by cookies that are not absolutely necessary will be obtained.

You can find a detailed list of the cookies we use, their storage period, origin and function at any time at <https://www.ptvgroup.com/en/cookies>. You can also change your cookie preferences there at any time.

### 2.2.1 Purpose of data processing

The purpose of using essential cookies is to enable you to use our website or certain features. Some functions of our website cannot be offered without the use of cookies. This means, for example, that the browser must

be recognised even after a page change. We do not use the information collected by essential cookies to create user profiles.

Non-essential cookies are generally used to improve the quality of our website and its content, as well as for advertising and market research purposes. Analytical cookies help us understand how the site is being used and allow us to continually improve our service.

## 2.2.2 Legal basis for data processing

The following applies to strictly necessary cookies: The legal basis for the storage of essential cookies on your end device and their access is Paragraph 25 (2) of the TDDDG (German Telecommunications Digital Services Data Protection Act). The legal basis for the further processing of personal data using the information stored in the cookie is Article 6 (1) (f) GDPR, which is a legitimate interest on our part. Our legitimate interest lies in the purposes mentioned above.

The following applies to non-essential cookies: The legal basis for the storage of non-essential cookies on your end device and their access is your consent pursuant to Paragraph 25 (1) TDDDG (German Telecommunications Digital Services Data Protection Act). The legal basis for the further processing of personal data using non-essential cookies is the consent given at the same time in accordance with Article 6 (1) (a) GDPR.

## 2.2.3 Storage duration

Some of the cookies we use are deleted at the end of the browser session, i.e. when you close your browser (so-called session cookies). Other cookies remain on your device and enable us or our service providers (third parties) to recognise your browser on your next visit (persistent or static cookies).

If we have stored the cookies on the basis of the user's consent, we will stop processing the data if the user revokes this consent. Otherwise, we store the data collected on the basis of a legitimate interest until the legitimate interest ceases to exist, the assessment comes to a different conclusion or the user has effectively lodged an objection in accordance with Article 21 GDPR (see the visually highlighted "Reference to specific right of objection" under Section 3). We will periodically review whether the legitimate interest still exists. In particular, our interest will cease when the data is no longer sufficiently relevant to us for analysis and statistics on website usage due to the passage of time, which is likely to be after three years at the latest.

## 2.2.4 Right of objection and removal

Cookies are stored on your computer and sent from your computer to our website. This gives you full control over the use of cookies. You can disable or restrict the sending of cookies by changing the settings on your internet browser. Cookies that have already been stored can be deleted at any time.

Below are links to typical browsers where you can find more information about managing your cookie preferences:

- Firefox: <https://support.mozilla.org/en-US/kb/enhanced-tracking-protection-firefox-desktop>
- Chrome: <https://support.google.com/chrome/answer/95647>
- Internet Explorer/Edge: <https://windows.microsoft.com/de-DE/windows-vista/Block-or-allow-cookies>
- Safari: <https://support.apple.com/en-us/guide/safari/sfri11471/mac>
- Opera: <https://help.opera.com/en/latest/web-preferences/#cookies>

- Yandex: <https://yandex.com/support/browser-beta/personal-data-protection/cookies.html>

Note: If you disable or delete cookies for our website, you may not be able to take full advantage of all the features of the website.

You can prevent the use of non-essential cookies by not giving or revoking your consent.

## 2.3 Data processing for newsletter distribution

It is possible to subscribe to a newsletter on our website or by sending us an enquiry. The data from the input screen is transmitted to us when you sign up for the newsletter. This is mandatory information

- Country and
- E-mail address.

We need the country information to tailor the content of the newsletter to your country and language.

Optionally, you can also enter your name and title so that we can address you by name. You also have the option of specifying your area of interest and industry, which will help us to refine our offer.

When registering for the newsletter, the following data is also collected (opt-in verification):

- Your IP address, and
- The date and time of your registration.

This is to prevent misuse of the service or your e-mail address and to fulfil our legal obligation to prove that an opt-in, i.e. express consent to receive the newsletter, has actually been given by the e-mail address.

Subscribing to our newsletter is a double opt-in process. This means that once you have registered, you will receive an e-mail asking you to confirm your registration. This confirmation is necessary to ensure that no one can register using someone else's e-mail address. When you click on the link to confirm your registration, your IP address and the exact time (date and time) of the click will be recorded. The purpose of this data processing is to fulfil our legal obligation to prove that an opt-in, i.e. express consent to receive the newsletter, has actually been given by the e-mail address.

Your consent to the processing of data is obtained as part of the registration process and reference is made to this Data Privacy Statement.

If you purchase goods or services from our website or other services and provide us with your e-mail address, we may subsequently use it to send you a newsletter. In this case, only direct advertising for our own similar goods or services will be sent via the newsletter.

The data will only be used for the purpose of sending the newsletter.

### 2.3.1 Use of the "Oracle Eloqua" software

Our e-mail newsletters are sent using the Eloqua marketing system from Oracle America, Inc., 2300 Oracle Way, Austin, TX 78741, USA ("Eloqua" / see further information about Eloqua below in Section 2.14). The data you provide when registering for the newsletter will be passed to the Eloqua system for this purpose. Please note that your data will normally be transferred to and stored on an Oracle server in the USA. Eloqua will use the data to send and analyse the newsletter on our behalf (see "Statistical data collection and analysis" below).

We have entered into a data processing agreement with Oracle (data processing agreement pursuant to Article 28 (3) GDPR). This is a contract in which Oracle undertakes to protect your data, to process it on our

behalf in accordance with its Privacy policy and, in particular, not to pass it on to third parties. This Data Processing Agreement can be viewed at: <https://www.oracle.com/a/ocom/docs/corporate/data-processing-agreement-062619.pdf>. In addition, we have agreed additional measures with Oracle that go beyond the provisions of the EU standard contractual clauses and require Oracle to take steps to further enhance the level of data protection.

In addition, Oracle America, Inc. is certified under the EU-U.S. Data Privacy Framework (DPF), which means that the transfer of data to Oracle is permitted under the EU adequacy decision because it ensures a level of data protection equivalent to that in the EU.

For more information about privacy at Oracle, please visit: [www.oracle.com/legal/privacy/privacy-policy.html](http://www.oracle.com/legal/privacy/privacy-policy.html).

## 2.3.2 Statistical data collection and evaluation

E-mails sent via Eloqua contain a recipient ID and a tracking pixel:

The recipient ID enables Oracle Eloqua to associate the opening activity of an e-mail with a contact. The tracking pixel is a 1x1 pixel image embedded in the e-mail that is used to track e-mail openings. The tracking image refers to an endpoint on the Oracle Eloqua servers. When the image loads, the endpoint records the opening of the e-mail. If a user does not load images when viewing an e-mail, Oracle Eloqua uses click-throughs to assume that an e-mail has been opened.

Link tracking is also performed for links contained in an e-mail. This means that we collect the fact that you have clicked on a particular link and process this information for marketing purposes and to improve our offers. We use Google Analytics to track these external links. For more information about Google Analytics, please see Section 2.5 of this Data Privacy Statement below.

The data is collected in a pseudonymised form only and is not linked to your other personal data; no direct personal reference is possible. This information will only be used for statistical analysis of newsletter campaigns. We use the analysis only to identify reading habits and to tailor our content to those habits or to deliver different content according to readers' interests. The reference to a specific person is not of interest to us and will not be made.

## 2.3.3 Purpose of data processing

The collection and processing of the user's e-mail address is for the purpose of sending the newsletter. We use the e-mail address for advertising purposes.

The collection of the IP address and time when the confirmation link in the double opt-in e-mail is clicked is to fulfil our legal obligation to obtain express consent.

Other personal information collected as part of the registration process is used to prevent misuse of the services or the e-mail address used.

We may retain your information for up to three years after you unsubscribe from our newsletter in order to provide evidence of your prior consent and to defend ourselves against any related claims.

## 2.3.4 Legal basis for data processing

The legal basis for the processing of data after registration for the newsletter is your consent pursuant to Article 6 (1) (a) GDPR. The legal basis for the storage of information (e.g. cookies) on your terminal and the access to this information, as well as the associated statistical data collection and analysis, is your consent,

which you give at the same time as your consent in accordance with the GDPR pursuant to Paragraph 25 (1) TDDDG.

If no consent has been given, data processing within the scope of the newsletter in the case of previous purchase of similar goods or services is carried out on the legal basis of Paragraph 7 (3) UWG (German Act against Unfair Competition) in conjunction with Article 6 (1) (f) GDPR.

The legal basis for the storage of the IP address and the time when you click on the confirmation link in the double opt-in e-mail and for possible further storage for up to three years after you unsubscribe from the newsletter is our legitimate interest pursuant to Article 6 (1) (f) GDPR (legitimate interest). In this case, the legitimate interest is to be able to prove that you have given your prior consent and to be able to defend against any claims arising from it.

### 2.3.5 Storage duration

The data is deleted as soon as it is no longer necessary to achieve the purpose for which it was collected. In particular, your e-mail address will be stored for the duration of your subscription to the newsletter.

We may retain unsubscribed e-mail addresses, together with the data collected when confirming consent to receive the newsletter, for up to three years on the basis of our legitimate interests, before deleting them in order to be able to prove that consent was previously given. The processing of this data is limited to the purpose of defending any claims. An individual request for deletion may be made at any time, provided that the prior consent is confirmed at the same time.

Other personal information collected during the registration process is generally deleted after a period of seven days.

### 2.3.6 Right of objection and removal

You can completely avoid the data processing described here by not subscribing to our newsletter. You can also unsubscribe from the newsletter at any time, free of charge and without formalities. You will find a corresponding link in each newsletter. This also allows you to withdraw your consent to the storage of personal data collected during the registration process. You may also object to the processing of your data by Oracle/Eloqua at any time with effect for the future by using the following link:  
[www.oracle.com/marketingcloud/opt-status.html](http://www.oracle.com/marketingcloud/opt-status.html).

## 2.4 Data processing when using the contact forms

Contact forms are available on our website to enable you to contact us electronically on a variety of topics. If you choose to do this, the information you enter in the form will be sent to us and stored. The subsequent processing of the data will always relate to the specific subject linked to the contact form.

Mandatory fields are marked with an asterisk. The information we ask you to provide is required to process your enquiry/request / contact. Information that is not required by a mandatory field is provided to us on a voluntary basis.

The following data fields are usually available on contact forms:

- E-mail address,
- Dear ...,

- First name and surname:
- Company name,
- Country,
- Telephone (usually optional),
- Area of interest,
- Role,
- Industry,
- Area of responsibility.

The following data is also stored at the time the message is sent:

- The user's IP address,
- Date and time of sending.

As part of the submission process, i.e. just before you click the "Submit" button, you will be informed again about the processing of your data and will be referred to this Data Privacy Statement.

## 2.4.1 Use of the "Oracle Eloqua" software

The data you send us via a contact form is imported internally into Oracle's Eloqua marketing system (see more information on Oracle Eloqua below in Section 2.14).

## 2.4.2 Purposes of data processing

The processing of personal data from the input mask is used to contact you and process your request. If contact is made, this also constitutes a legitimate interest to process the data.

The other personal data processed during the submission process is used to prevent misuse of the contact form and to ensure the security of our information technology systems.

## 2.4.3 Legal basis for data processing

The legal basis for the processing of the data is the consent given by filling in and sending the data of the contact form in accordance with Article 6 (1) (a) GDPR, alternatively our legitimate interest in the data processing pursuant to Article 6 (1) (f) GDPR. The legitimate interest lies in the fact that we need to process your data in order to be able to deal with your request or to contact you in the first place and, if necessary, to respond to you.

If the contact or your inquiry is aimed at the conclusion of a contract or if your inquiry relates to an existing contractual relationship with us, the legal basis for the processing is Article 6 (1) (b) GDPR (implementation of contractual or pre-contractual measures).

The legal basis for the processing of the other personal data processed during the submission process is our legitimate interest in data processing in accordance with Article 6 (1) (f) GDPR, which here consists in preventing misuse of the contact form and ensuring the security of our information technology systems.

## 2.4.4 Storage duration

The data will be deleted as soon as it is no longer necessary to fulfil the purpose for which it was collected. In the case of personal data from the input screen, this will be the case where the relevant conversation with you has clearly ended and we have waited a period of up to 6 months to see if the conversation will be reopened. The conversation is closed when it can be concluded from the circumstances that the matter in question has been conclusively clarified. The communication may be subject to a commercial or tax law retention obligation, which will then take precedence (see above under "Data deletion and retention period"). The additional personal data collected during the submission process will be deleted after a period of seven days.

## 2.4.5 Right of objection and removal

You can opt out of certain data processing by contacting us by other means. You also have the option at any time to object to further data processing on the grounds of legitimate interest (see reference to specific right of objection under Section 3 of this Data Privacy Statement). In this case, the conversation cannot be continued.

You may object to further processing of your data by sending us an informal notice (e.g. by e-mail). In this case, all personal data stored in the course of contacting you will be deleted, unless there are other legal obligations or rights of retention which take precedence.

## 2.5 Use of the Google Analytics tool

Our website uses Google Analytics, a web analytics service provided by Google Inc, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). Google Ireland Limited (Gordon House, Barrow Street Dublin 4, Ireland), an EU-based company, is responsible for all Google services in Europe.

Google Analytics uses "cookies", text files which are saved on your computer and enable your use of the website to be analysed (see also the further explanations above under Section 2.2 on "Cookies").

We would like to point out that on this website Google Analytics has been extended by the "anonymizeIp" code to ensure IP addresses are collected anonymously (IP masking). By enabling IP anonymisation on this website, your IP address will be abbreviated beforehand by Google in European Union (EU) Member States or other states party to the European Economic Area (EEA) Agreement. Only in exceptional cases will the complete IP address be sent to a Google server in the USA and abbreviated there. On behalf of the website operator, Google will use this information to analyse your use of the website in order to compile reports on website activities for the website operator and to perform other services associated with website and Internet use. When using Google Analytics, the IP address sent by your browser will not be combined with other Google data.

Google processes personal data in the USA and elsewhere. The EU Commission has issued an adequacy decision on the transfer of data from the EU or EEA to the US. Google Inc., as the US parent company of Google Ireland Limited, has joined and is certified under the EU-US Data Privacy Framework (DPF) on which this adequacy decision is based. The transfer of data to the USA is therefore permitted (Article 45 (1) GDPR) and the data processing thus essentially corresponds to the level of data protection in the EU.

As an additional basis for data processing with recipients located in third countries (= countries outside the EEA, i.e. all countries outside the European Union, Iceland, Liechtenstein and Norway) or for a data transfer there, Google uses the EU standard contractual clauses (see Article 46 (2) and (3) GDPR). These Standard Contractual Clauses (SCCs) are templates provided by the EU Commission to ensure that your data complies with European data protection standards when transferred to and processed in third countries. By agreeing to

these terms, Google agrees to comply with the European data protection level when processing personal data, even if the data is processed in the US. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding standard contractual clauses here: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021D0914&from=EN>

Google has also entered into an order processing agreement with us pursuant to Article 28 (3) GDPR, which serves as the data protection basis for our customer relationship with Google. This refers to the content of the EU standard contractual clauses. You can find the data processing terms here: <https://business.safety.google/intl/en/adsprocessor/terms/>

You can find more information on Google's terms of use and privacy policy at <https://marketingplatform.google.com/about/analytics/terms/us/> or at <https://www.google.com/intl/en/policies/>.

## 2.5.1 Purpose of data processing

The purpose of using the analytics tool or cookies is to improve the quality of our website and its content. This helps us to understand how the site is being used and to continually improve our service.

## 2.5.2 Legal basis for data processing

The legal basis for the storage of information (e.g. cookies) on your end device and the access to this information is your consent in accordance with Paragraph 25 (1) TDDDG. The legal basis for the further processing of the personal data stored in your end device in this way is your consent given at the same time in accordance with Article 6 (1) (a) GDPR.

## 2.5.3 Storage duration

The cookies are stored on the user's device and sent to our website. As a user, you therefore have full control over the use of cookies. You can disable or restrict the sending of cookies by changing the settings on your internet browser. Cookies that have already been stored can be deleted at any time. This can also be automated. If you disable for our website, you may not be able to take full advantage of all the features of the website.

Otherwise, we will store the data provided on the basis of your consent until you withdraw your consent, which you may notify us of.

## 2.5.4 Right of objection and removal

You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to make full use of all the features of this website.

You can also stop data from being collected through the cookies and the data on your use of the website (including your IP address) from being sent to and processed by Google by downloading and installing the browser plug-in available at the following link (<http://tools.google.com/dlpage/gaoptout?hl=en>).

Once you have given us your consent, you can withdraw it at any time with effect for the future.

You can also opt out of the collection of data by Google Analytics by clicking on the following link. An opt-out cookie will then be set to prevent your data from being collected when you visit this website in the future: `<a href="javascript:gaOptout()">Disable Google Analytics</a`

## 2.6 Use of Google Ads conversion tracking

This website uses Google Ads, an online advertising program of Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. In Europe, Google Ireland Limited (Gordon House, Barrow Street Dublin 4, Ireland) is responsible for all Google services and is therefore the service provider.

We use conversion tracking as part of Google Ads. If you click on a Google ad, a conversion tracking cookie is placed on your computer. Cookies are small text files which an Internet browser places on your computer. These cookies are not used to personally identify users. If you visit certain pages on this website and the cookie has not yet expired, we and Google may be able to tell that the user has clicked on the ad and was taken to that page.

Every Google Ads customer receives a different cookie. Cookies cannot be tracked via the websites of Ads customers (i.e. us).

Information obtained with the help of conversion cookies is used to produce conversion statistics for Ads customers which have opted for conversion tracking. Ads customers learn the total number of users who have clicked on their ad and been redirected to a page provided with a conversion tracking tag. However, they do not receive any information allowing them to identify the user.

More information about Google Ads and Google Conversion Tracking can be found in Google's data protection regulations: <https://www.google.com/policies/privacy/>

Google describes its data processing when using personal data from websites or apps on or in which Google services are used more specifically here: <https://www.google.com/policies/technologies/ads>. You can also find instructions on how to reset or delete your Google advertising ID, which is used by Google to identify you.

Specific information on cookies set by Google can be found here:

<https://policies.google.com/technologies/cookies?hl=en#types-of-cookies>

Google processes personal data in the USA and elsewhere. The EU Commission has issued an adequacy decision on the transfer of data from the EU or EEA to the US. Google Inc., as the US parent company of Google Ireland Limited, has joined and is certified under the EU-US Data Privacy Framework (DPF) on which this adequacy decision is based. The transfer of data to the USA is therefore permitted without special authorisation (Article 45 (1) GDPR).

As an additional basis for data processing with recipients located in third countries (= countries outside the EEA, i.e. all countries outside the European Union, Iceland, Liechtenstein and Norway) or for a data transfer there, Google uses the EU standard contractual clauses (= Article 46 (2) and (3) GDPR). These Standard Contractual Clauses (SCCs) are templates provided by the EU Commission to ensure that your data complies with European data protection standards when transferred to and processed in third countries. By agreeing to these terms with us, Google agrees to comply with the European data protection level when processing personal data, even if the data is processed in the US. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding standard contractual clauses here:

<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021D0914&from=EN>

Google has also entered into an order processing agreement with us pursuant to Article 28 (3) GDPR, which serves as the data protection basis for our customer relationship with Google. This refers to the content of the EU standard contractual clauses. You can find the data processing terms here:

<https://business.safety.google/intl/en/adsprocessor/terms/>

## 2.6.1 Purpose of data processing

The information collected by the conversion cookie is used to generate conversion statistics for us. We find out the total number of users who clicked on our ad and were directed to our site. We want to use this to improve and optimise our ads. However, we do not receive any information allowing us to identify the user. This is used to analyse and optimise our advertising and marketing activities.

## 2.6.2 Legal basis for data processing

Conversion cookies are stored on the user's end device on the basis of Paragraph 25 (1) TDDD. Further storage and processing of the data takes place on the basis of Article 6 (1) (a) GDPR. Both are based on your consent requested at the start of use.

## 2.6.3 Storage duration

We do not store any personal data ourselves in connection with the use of Google Ads or conversion tracking. However, Google may store this information using cookies or similar technologies. Unfortunately, we have no control over whether or how long Google does this.

Google provides specific information about cookies and their storage period here:

<https://policies.google.com/technologies/cookies?hl=en#types-of-cookies>

After that, cookies are stored for a maximum of 13 months, and in some cases much less.

## 2.6.4 Right of objection and removal/opt-out

In general, you can configure your browser to receive notifications about the placement of cookies and only allow cookies in individual cases, enable the acceptance of cookies in specific cases or generally refuse them and enable automatic deletion of cookies when you close your browser. Disabling cookies may limit the functionality of this website.

You can disable or restrict the sending of cookies by changing the settings on your internet browser. Cookies that have already been stored can be deleted at any time. This can also be automated. If you disable for our website, you may not be able to take full advantage of all the features of the website.

If you use the Google Chrome browser, a plugin which deactivates personalised advertising can be installed on the website <https://www.google.com/settings/ads/plugin> - in addition to the decisions made in the "Settings" menu. Please note that you will still receive as many ads as before - they will just not be tailored to your interests.

If you do not wish to participate in tracking, you can object to such use by disabling the Google conversion tracking cookie via your Internet browser's user settings. You will then not be included in conversion tracking statistics.

Alternatively, you can opt out of the use of cookies for interest-based advertising through the ad network initiative by following the instructions at [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp)

You can opt out of Google's use of your information for personalised advertising in the future by opting out of personalised advertising in your Google Account by following this link: [www.google.com/settings/ads/onweb/](http://www.google.com/settings/ads/onweb/)

## 2.7 Use of the Google Tag Manager analysis tool

Our website uses Google Tag Manager, which is provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. In Europe, Google Ireland Limited (Gordon House, Barrow Street Dublin 4, Ireland) is responsible for all Google services. This service from Google allows you to manage website tags via an interface. We use Tag Manager to manage and control the website tags on our platform.

Google Tag Manager only implements tags. This means that no cookies are used and no personal data is collected. Google Tag Manager triggers other tags that may also collect data. However, Google Tag Manager does not access this data. If you opt-out at the domain or cookie level, your opt-out will remain in place for any tracking tags implemented with Google Tag Manager.

Among other things, it controls the Google Analytics tool mentioned above.

Therefore, Google Tag Manager does not result in any additional data processing, but simply makes it easier to place tags on your website. Therefore, no additional personal data is processed through the use of Google Tag Manager.

Further information on data processing by Google can be found in Google's privacy policy:

<https://policies.google.com/privacy?hl=en>. You can also change your settings there in the data protection centre (<https://myaccount.google.com/privacycheckup>) so that you can manage and protect your data. You can also find more instructions on how to manage your own data when using Google products.

## 2.8 Use of the Google API interface

Our website uses Google APIs from Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. In Europe, Google Ireland Limited (Gordon House, Barrow Street Dublin 4, Ireland) is responsible for all Google services. This is a program interface provided by Google. When you use this website, information such as your IP address may be transmitted to Google.

Further information on data processing by Google can be found in Google's privacy policy. You can also change your settings there in the data protection centre so that you can manage and protect your data.

You can also find more instructions on how to manage your own data when using Google products.

### 2.8.1 Purpose of data processing

We use the Google API as an interface between our website and the Google products we use (e.g. Analytics and Maps). This information is used for the purposes of analysis, error correction, optimisation and economic operation of the website, as well as to improve and optimise the user experience on the website.

### 2.8.2 Storage duration

The data will be deleted as soon as it is no longer necessary to fulfil the purpose for which it was collected.

### 2.8.3 Legal basis for data processing

The legal basis for processing personal data using the Google APIs is Article 6 (1) (f) GDPR, which is a legitimate interest on our part. In particular, our legitimate interest is to analyse, optimise and commercially operate our website and online services, and to enable troubleshooting and error correction by analysing and displaying error messages and causes of crashes.

## 2.8.4 Right of objection and removal

You can object to data processing on the grounds of overriding legitimate interest at any time in accordance with Article 21 GDPR (for more information on the right to object, see Section 3 on the rights of data subjects).

Otherwise, the only way you can avoid this data processing is by not visiting our website.

You may refuse the execution of the Java Script code required for the tool by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to make full use of all the features of this website.

To prevent Java Script code from being executed altogether, you can also install a Java Script blocker, such as the NoScript browser plug-in. (e.g. [www.noscript.net](http://www.noscript.net)).

## 2.9 Use of YouTube videos (in enhanced privacy mode)

On our website you can watch YouTube videos (provider: YouTube LLC 901 Cherry Ave., 94066 San Bruno, CA, USA). In Europe, YouTube is operated by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. We have placed these YouTube videos in YouTube's enhanced privacy mode, which blocks YouTube cookies from being set until an active click is made during playback.

Therefore, videos will only be reloaded and YouTube cookies will only be set for you if you opt in to the setting of YouTube cookies by clicking on such a video for the first time. We have provided information in the relevant videos.

YouTube is a subsidiary of Google Inc., as is Google Ireland Limited, which is responsible for operations in Europe. Every time a product that has a YouTube video embedded is accessed, the website will play the YouTube video. As part of this process, YouTube and Google receive information about which product is being accessed. If you are also logged in to YouTube, YouTube will recognise which specific page you are visiting when you visit a page that contains a YouTube video. This information is collected by YouTube and Google and associated with your YouTube account.

With respect to any transfer of data to the United States, the information about Google in the EU-US Privacy Framework, the EU Standard Contractual Clauses, and the Data Processing Agreement set forth above will apply accordingly.

YouTube's privacy policy provides information about the collection, processing and use of personal information by YouTube and Google and can be accessed here: <http://www.google.com/intl/en/policies/privacy>

### 2.9.1 Purpose of data processing

The purpose of embedding YouTube videos is to provide you with multimedia content on the site and to enhance and improve your experience on the website. By making our website more attractive, the use of YouTube also serves our marketing and advertising purposes.

### 2.9.2 Legal basis for data processing

The legal basis for the processing of personal data is your consent pursuant to Article 6 (1) (a) GDPR. The legal basis for embedding the videos themselves is Article 6 (1) (f) GDPR, which is a legitimate interest on our part. Our legitimate interest lies in the purposes mentioned above.

### 2.9.3 Storage duration

We do not store any personal information related to the use of YouTube videos. We will analyse the access and views of individual videos, but without reference to any specific individual.

We have no control over the storage by YouTube or Google itself. Please see Google's privacy policy for the exact circumstances in which data is processed there: <http://www.google.com/intl/en/policies/privacy>

### 2.9.4 Right of objection and removal

YouTube and Google will always receive information that the user has visited our site if the user is logged in to YouTube at the same time as using the app, whether or not the user clicks on a YouTube video. If you do not want this information to be transmitted to YouTube and Google, you can prevent the transmission by signing out of your YouTube account before visiting the site. You can also find options to minimise Google's data processing in your YouTube account settings. As the video portal is owned by Google, you can find the settings in the general settings of your Google account. Under "Activity settings" (<https://myactivity.google.com/activitycontrols>) you can find options for web and location history, as well as special privacy features on YouTube. First, you can pause your video search history so that your searches are no longer stored. You can also turn off the video playback history so that not all the videos you watch are stored.

Otherwise, you can avoid processing the data by not accessing pages containing YouTube videos.

## 2.10 Use of videos via the Vimeo platform

We use plugins from the provider Vimeo, among other things, to integrate videos on our website. Vimeo is operated by Vimeo.com, Inc., 330 West 34th Street, 10th Floor, New York, NY 10001, USA.

There is an adequacy decision for data transfer to the US. Accordingly, data transfer to the US is legally permissible if the data recipient is certified under the EU-US and Swiss-US Privacy Shield (Data Privacy Framework), which is the case with Vimeo.com, Inc.

When you access the pages of our website that have the plug-in, a connection to the Vimeo servers is established. This tells the Vimeo server which of our pages you have visited. If you are logged in as a Vimeo member, Vimeo assigns this information to your personal user account. When you use the plug-in, for example by clicking the start button of a video, this information is also assigned to your user account.

In addition, Vimeo accesses the Google Analytics tracker via an iFrame in which the video is accessed. This is Vimeo's own tracking, to which we have no access. You can prevent tracking by Google Analytics by using the deactivation tools that Google offers for some Internet browsers. Users can also prevent the collection of data generated by Google Analytics and related to their use of the website (including your IP address) to Google and the processing of this data by Google by downloading and installing the browser plugin available at the following link <https://tools.google.com/dlpage/gaoptout?hl=en>.

Further information on data processing and Vimeo's privacy policy can be found at <https://vimeo.com/privacy>. Vimeo's cookie policy can be found here: [https://vimeo.com/cookie\\_policy](https://vimeo.com/cookie_policy)

### 2.10.1 Purpose of data processing

Vimeo videos are embedded on our website for the purpose of presenting multimedia content to the user and thereby enhancing and improving the user experience on the website. Since this makes our website more attractive, the use of Vimeo also serves our marketing and advertising purposes.

## 2.10.2 Legal basis for data processing

The legal basis for the storage of non-essential cookies on your device and access to them is your consent in accordance with Paragraph 25 (1) TDDDG. The legal basis for the further processing of personal data using non-essential cookies is Article 6 (1) (a) GDPR, i.e. your consent granted in accordance with the GDPR, which we request from you at the beginning of your visit to the website or before playing a Vimeo video and establishing a connection to Vimeo servers.

## 2.10.3 Storage duration

Vimeo itself stores your data if you are logged in as a Vimeo member for as long as your Vimeo member account exists (see Vimeo's privacy policy: <https://vimeo.com/privacy>). If you are not logged in to Vimeo, we assume that your personal data will not be stored beyond the retrieval of the video. Unfortunately, Vimeo itself does not provide any information on this, but Vimeo does state that its services comply with European data protection law. Therefore, in this case, the data will be deleted by Vimeo as soon as the purpose for which it was collected no longer applies.

We ourselves do not store your data when you use Vimeo videos on our website.

## 2.10.4 Right of objection and removal

If you have a Vimeo user account and do not want Vimeo to collect data about you via this website and link it to your membership data stored at Vimeo, you must log out of Vimeo before visiting this website. You can also delete the corresponding Vimeo cookies via your browser.

You can also avoid data processing by refusing your consent or revoking it with effect for the future.

## 2.11 Use of the Hotjar analysis tool

This website uses Hotjar, analytics software provided by Hotjar Ltd. (<http://www.hotjar.com>) based in the EU (Dragonara Business Centre 5th Floor, Dragonara Road, Paceville St Julian's STJ 3141 Malta). Hotjar allows us to measure and analyse user behaviour (clicks, mouse movements, scroll heights, etc.) on our website. The information generated by the tracking code and cookie about your visit to our website is transmitted to and stored by Hotjar's servers in Ireland.

More information about Hotjar and how it uses and processes data can be found in Hotjar's Privacy policy: <https://www.hotjar.com/legal/policies/privacy> or <https://www.hotjar.com/privacy>.

The following information may be recorded by your device and browser:

- The IP address of your device (collected and stored in an anonymised format),
- Screen size of your device,
- Device type and browser information,
- Geographical location (country only),
- The preferred language to display our website,
- Log data.

The following data is automatically generated by our server when you use Hotjar

- Referring domain,
- Pages visited,
- Geographical location (country only),
- The preferred language to display our website,
- Date and time of access to the website.

Hotjar will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Hotjar also uses third party services such as Google Analytics and Optimizely to provide its services.

These third parties may store information that your browser sends when you visit the site, such as cookies or IP requests. For more information about how Google Analytics and Optimizely store and use data, please see their respective privacy policies.

### 2.11.1 Purpose of data processing

Hotjar is used to improve the quality of our website and its content by showing you ads that are optimised for your actual individual needs and interests. This helps us to understand how the site is being used and to continually improve our service. This use ultimately serves our advertising and marketing interests.

### 2.11.2 Legal basis for data processing

The legal basis for the use of Hotjar and the necessary storage, reading and access to non-essential cookies on the user's device is your consent pursuant to Paragraph 25 (1) TDDDG. The legal basis for the further processing of personal data using non-essential cookies is Article 6 (1) (a) GDPR, which is the consent of the user.

### 2.11.3 Storage duration

Please note that the cookies set by Hotjar are subject to different retention periods; some cookies are retained for up to 365 days, while others are retained only during your current visit and are deleted when you leave our site. Some cookies are only valid for 30 minutes. All information on the cookies set by Hotjar, including storage periods, can be found here: <https://help.hotjar.com/hc/en-us/articles/6952777582999-Cookies-Set-by-the-Hotjar-Tracking-Code>.

### 2.11.4 Right of objection and removal

The cookies are stored on the user's computer and sent to our website. As a user, you therefore have full control over the use of cookies. You can disable or restrict the sending of cookies by changing the settings on your internet browser. Cookies that have already been stored can be deleted at any time. This can also be automated. If you disable for our website, you may not be able to take full advantage of all the features of the website.

You can avoid data processing altogether by not giving your consent or by withdrawing your consent with effect for the future.

Opt-out: Hotjar does not store any of your personal data for analysis. You will always have the option to prevent your information from being collected. To do this, go to the "Opt-out page" and click on "Deactivate Hotjar": <https://www.hotjar.com/opt-out>.

## 2.12 Use of the LinkedIn Analytics tool

We use the website analytics tool LinkedIn Analytics, a service provided in the EU by LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland.

This tool can be used to show personalised ads on LinkedIn to visitors to this website. It is also possible to generate anonymous reports on the performance of advertisements and information on website interaction. To do this, this site uses the LinkedIn Insight tag, which connects to the LinkedIn server when you visit this site and are logged into your LinkedIn account.

Information on the LinkedIn Insight Tag and its functions can be found here:

<https://business.linkedin.com/marketing-solutions/insight-tag>

LinkedIn's privacy policy with further information on data processing there can be found here:

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

### 2.12.1 Purpose of data processing

We use this tool to track who visits our site as a result of a LinkedIn ad, in order to better understand and optimise these ads and the reach they achieve.

### 2.12.2 Legal basis for data processing

Data is processed on the basis of your consent pursuant to Article 6 (1) (a) GDPR.

### 2.12.3 Storage duration

LinkedIn states that the cookies set as part of using LinkedIn Analytics are stored for 30 days (see

<https://www.linkedin.com/legal/l/cookie-table?#thirdparty>).

### 2.12.4 Right of objection and removal

You may withdraw your consent at any time with immediate effect.

If you are logged in to LinkedIn, you can also opt out of data collection at any time by clicking on the following link: <https://www.linkedin.com/psettings/enhanced-advertising>.

## 2.13 Use of Google Analytics Remarketing

We also use Google Remarketing, an advertising analysis tool, for our website. The service provider is Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. In Europe, Google Ireland Limited (Gordon House, Barrow Street Dublin 4, Ireland) is responsible for all Google services.

The tool allows us to link Google Analytics Remarketing audiences to the cross-device features of Google AdWords and Google DoubleClick. In this way, interest-based, personalised advertising messages which have been adapted to you depending on your previous usage and surfing behaviour on an end device (for example, a mobile phone) can also be displayed on another of your end devices (for example, tablet or PC). If you have given the relevant consent to Google, Google will associate your web and app browsing history with your Google Account for this purpose. In this way, the same personalised advertising messages can be enabled on each of the devices that you sign in to with your Google Account. To support this feature, Google Analytics

collects Google authenticated user IDs, which are temporarily linked to our Google Analytics data in order to define and create target groups for cross-device advertising campaigns.

We use Google Remarketing's Customer Matching feature to create target audiences. For this purpose, we transfer encrypted lists of certain customer information (such as e-mail addresses) to Google. If you are a Google user and signed in to your Google account, we will show you appropriate ads within the Google network (e.g., YouTube, Gmail, or a search engine).

Google also processes personal data in the USA. The EU Commission has issued an adequacy decision on the transfer of data from the EU or EEA to the US. Google Inc., as the US parent company of Google Ireland Limited, has joined and is certified under the EU-US Data Privacy Framework (DPF) on which this adequacy decision is based. The transfer of data to the USA is therefore permitted without special authorisation (Article 45 (1) GDPR).

As an additional basis for data processing with recipients located in third countries (= countries outside the EEA, i.e. all countries outside the European Union, Iceland, Liechtenstein and Norway) or for a data transfer there, Google uses the EU standard contractual clauses (= Article 46 (2) and (3) GDPR). These Standard Contractual Clauses (SCCs) are templates provided by the EU Commission to ensure that your data complies with European data protection standards when transferred to and processed in third countries. By agreeing to these terms with us, Google agrees to comply with the European data protection level when processing personal data, even if the data is processed in the US. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding standard contractual clauses here:

<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021D0914&from=EN>

Google has also entered into an order processing agreement with us pursuant to Article 28 (3) GDPR, which serves as the data protection basis for our customer relationship with Google. This refers to the content of the EU standard contractual clauses. You can find the data processing terms here:

<https://business.safety.google/intl/en/adsprocessor/terms/>

You can find out more about the data processed through the use of Google Remarketing in the privacy policy at <https://policies.google.com/privacy?hl=en>. Google describes its data processing when using personal data from websites or apps on or in which Google services are used more specifically here:

<https://www.google.com/policies/technologies/ads>. You can also find instructions on how to reset or delete your Google advertising ID, which is used by Google to identify you.

Specific information on cookies set by Google can be found here:

<https://policies.google.com/technologies/cookies?hl=en#types-of-cookies>

### 2.13.1 Purpose of data processing

We use Google Remarketing to help us understand your interests across devices and websites so that we can target our products and services to you on other devices and websites and display ads that are more relevant to your actual, individual needs and interests.

### 2.13.2 Legal basis for data processing

The legal basis for the storage of cookies and similar technologies on your end device and their access (reading) is your consent pursuant to Paragraph 25 (1) TDDDG. The legal basis for the further processing of the personal data stored in your end device in this way is your consent given at the same time in accordance with Article 6 (1) (a) GDPR.

### 2.13.3 Storage duration

We do not store any personal data ourselves in connection with the use of Google Analytics Remarketing. However, Google may store this information using cookies or similar technologies. Unfortunately, we have no control over whether or how long Google does this.

Google provides specific information about cookies and their storage period here:

<https://policies.google.com/technologies/cookies?hl=en#types-of-cookies>

After that, cookies are stored for a maximum of 13 months, and in some cases much less.

### 2.13.4 Right of objection and removal/opt-out

You can configure your browser to receive notifications about the placement of cookies and only allow cookies in individual cases, enable the acceptance of cookies in specific cases or generally refuse them and enable automatic deletion of cookies when you close your browser.

Disabling cookies may limit the functionality of this website.

You can disable or restrict the sending of cookies by changing the settings on your internet browser. Cookies that have already been stored can be deleted at any time. This can also be automated.

If you use the Google Chrome browser, a plugin which deactivates personalised advertising can be installed on the website <https://www.google.com/settings/ads/plugin> - in addition to the decisions made in the "Settings" menu. Please note that you will still receive as many ads as before - they will just not be tailored to your interests.

If you specifically do not wish to use Google's remarketing feature, you can generally disable it by making the appropriate settings at <http://www.google.com/settings/ads>. Alternatively, you can opt out of the use of cookies for interest-based advertising through the ad network initiative by following the instructions at [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp).

You can opt out of cross-device remarketing/targeting in the future by opting out of personalised advertising in your Google Account by following this link: <https://adssettings.google.com/anonymous?hl=en>.

## 2.14 Use of Oracle's Eloqua marketing tool

We use the Eloqua marketing system from Oracle America, Inc.

2300 Oracle Way, Austin, TX 78741, USA ("Eloqua") on our website. Eloqua uses persistent cookies to provide these services. These cookies collect information about your use of our website. The information collected in this way is only visible to us and is not shared with Oracle or other users of the Eloqua system.

We have entered into a data processing agreement with Oracle (data processing agreement pursuant to Article 28 (3) GDPR). This is a contract in which Oracle undertakes to protect your data, to process it on our behalf in accordance with its Privacy policy and, in particular, not to pass it on to third parties. This Data Processing Agreement can be viewed at: <https://www.oracle.com/a/ocom/docs/corporate/data-processing-agreement-062619.pdf>. In addition, we have agreed additional measures with Oracle that go beyond the provisions of the EU standard contractual clauses and require Oracle to take steps to further enhance the level of data protection.

In addition, Oracle America, Inc. is certified under the EU-U.S. Data Privacy Framework (DPF), which means that the transfer of data to Oracle is permitted under the EU adequacy decision because it ensures a level of data protection equivalent to that in the EU.

For more information about privacy at Oracle, please visit: [www.oracle.com/legal/privacy/privacy-policy.html](http://www.oracle.com/legal/privacy/privacy-policy.html).

### 2.14.1 Purpose of data processing

Eloqua enables us to use cookies to analyse and evaluate the use of our website in order to continually improve the marketing experience and individualised approach to our customers and prospects. The use of the tool therefore serves our advertising and marketing interests.

We also use Eloqua to send you e-mails if you have signed up for our e-mail marketing (see B.3 above for information about sending newsletters). E-mails sent from Eloqua, as well as our website, use Eloqua's tracking technology, which allows us to track your e-mail reading behaviour, including whether e-mails are opened and which links are clicked.

### 2.14.2 Legal basis for data processing

The data processing described above is carried out on the basis of your consent in accordance with Article 6 (1) (a) GDPR. We ask for your consent at the beginning of your visit to our website.

### 2.14.3 Storage duration

Personal data in Eloqua is deleted at least once a month according to defined criteria. As a matter of principle, Eloqua stores personal data until the purpose for which it was collected no longer exists and a change of purpose is not possible or not carried out. All personal data in Eloqua will be completely deleted no later than 760 days after the associated contact has been deleted.

### 2.14.4 Right of objection and removal

You may object to the collection of your data at any time with effect for the future by using the following link: [www.oracle.com/marketingcloud/opt-status.html](http://www.oracle.com/marketingcloud/opt-status.html) or by notifying us of your objection.

## 2.15 Use of the OptinMonster tool

This website uses the OptinMonster plugin from Retyp LLC, 3701 Savoy Ln West Palm Beach, FL 33417, USA (OptinMonster). Optinmonster is a marketing tool for creating registration forms, pop-ups and notifications.

OptinMonster uses cookies. Personal data will only be processed if the user actively chooses to provide it (e.g. by registering for the newsletter). The data we receive through this tool is also anonymised and cannot be linked to any specific individual. Neither the provider nor we collect or process personal data in connection with the use of the tool.

For details on OptinMonster's handling of personal data, please refer to OptinMonster's Privacy policy: <https://optinmonster.com/privacy/>.

We have a data processing agreement with OptinMonster (see <https://optinmonster.com/gdpr/dpa/>). This is a contract in which OptinMonster undertakes, among other things, to protect the data of our users, to process it on our behalf in accordance with its privacy policy and, in particular, not to pass it on to third parties.

### 2.15.1 Purpose of data processing

The plugin allows us to provide visitors to this website with additional offers (e.g. promotions) via overlays (similar to a pop-up window), making our site more interesting and user-friendly. These overlays will take you to a specific web address when clicked. No data is collected or processed by us or the provider.

### 2.15.2 Legal basis for data processing

The data entered in the form is processed on the basis of your consent (Article 6 (1) (a) GDPR). The necessary storage of cookies in your end device and access to them is based on the consent given at the same time in accordance with Paragraph 25 (1) TDDDG. You may withdraw your consent at any time. The legitimacy of data processing processes that have already taken place will remain unaffected by the withdrawal.

### 2.15.3 Storage duration

We do not collect or process any personal data through the tool. We delete aggregated data immediately as we do not perform any analysis or similar.

In exceptional cases, where personal data is processed as a result of an active action (e.g. registering for the newsletter), we will process this data until the consent given for this purpose is withdrawn.

### 2.15.4 Right of objection and removal

You have full control over the use of cookies. You can disable or restrict the sending of cookies by changing the settings on your internet browser. Cookies that have already been stored can be deleted at any time. This can also be automated. If you disable for our website, you may not be able to take full advantage of all the features of the website.

## 2.16 Use of Google AdSense (non-personalised)

This website uses Google AdSense, a service that integrates advertisements. The provider is Google Inc. 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. In Europe, Google Ireland Limited (Gordon House, Barrow Street Dublin 4, Ireland) is responsible for all Google services.

We use Google AdSense in 'non-personalised' mode. Unlike personalised mode, this means that ads are not based on your past usage and no user profile is created for you. Instead,

"contextual information" is used to select ads. The ads you see may be based on your location, the content of the website you are visiting, or your current search terms. To learn more about the differences between personalised and non-personalised targeting with Google AdSense, click here:

<https://support.google.com/adsense/answer/9007336>.

Please note that cookies or similar recognition technologies (such as device fingerprinting) may also be used when using Google AdSense in a non-personalised manner. Google says it only uses this information to combat fraud and abuse.

Google also processes personal data in the USA. The EU Commission has issued an adequacy decision on the transfer of data from the EU or EEA to the US. Google Inc., as the US parent company of Google Ireland Limited, has joined and is certified under the EU-US Data Privacy Framework (DPF) on which this adequacy decision is

based. The transfer of data to the USA is therefore permitted without special authorisation (Article 45 (1) GDPR).

As an additional basis for data processing with recipients located in third countries (= countries outside the EEA, i.e. all countries outside the European Union, Iceland, Liechtenstein and Norway) or for a data transfer there, Google uses the EU standard contractual clauses (= Article 46 (2) and (3) GDPR). These Standard Contractual Clauses (SCCs) are templates provided by the EU Commission to ensure that your data complies with European data protection standards when transferred to and processed in third countries. By agreeing to these terms with us, Google agrees to comply with the European data protection level when processing personal data, even if the data is processed in the US. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding standard contractual clauses here:

<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021D0914&from=EN>

Google has also entered into an order processing agreement with us pursuant to Article 28 (3) GDPR, which serves as the data protection basis for our customer relationship with Google. This refers to the content of the EU standard contractual clauses. You can find the data processing terms here:

<https://business.safety.google/intl/en/adsprocessor/terms/>.

### 2.16.1 Purpose of data processing

Google AdSense is used to serve appropriate ads to you on our website based on the contextual information described above, i.e. for advertising purposes.

### 2.16.2 Legal basis for data processing

The legal basis for the storage of cookies and similar technologies on your end device and their access (reading) is your consent pursuant to Paragraph 25 (1) TDDDG. The legal basis for the further processing of the personal data stored in your end device in this way is your consent given at the same time in accordance with Article 6 (1) (a) GDPR.

### 2.16.3 Storage duration

We do not store any personal data ourselves in connection with the use of Google AdSense. However, Google may store this information using cookies or similar technologies. Unfortunately, we have no control over whether or how long Google does this.

Google provides specific information about cookies and their storage period here:

<https://policies.google.com/technologies/cookies?hl=en#types-of-cookies>

After that, cookies are stored for a maximum of 13 months, and in some cases much less.

### 2.16.4 Right of objection and removal/opt-out

You can configure your browser to receive notifications about the placement of cookies and only allow cookies in individual cases, enable the acceptance of cookies in specific cases or generally refuse them and enable automatic deletion of cookies when you close your browser. Disabling cookies may limit the functionality of this website.

You can disable or restrict the sending of cookies by changing the settings on your internet browser. Cookies that have already been stored can be deleted at any time. This can also be automated. If you disable for our website, you may not be able to take full advantage of all the features of the website.

If you use the Google Chrome browser, a plugin which deactivates personalised advertising can be installed on the website <https://www.google.com/settings/ads/plugin> - in addition to the decisions made in the "Settings" menu. Please note that you will still receive as many ads as before - they will just not be tailored to your interests.

## 2.17 Conversion pixels from Adform

This website uses conversion tracking from Adform from the EU-based provider Adform A/S, Silkegade 3B, ST. & 1., 1113 Copenhagen, Denmark ("Adform").

The categories of data processed are data on the use of the website and the logging of clicks on individual elements.

Adform uses cookies to determine which ads are shown to a user. This is based on products that a visitor has already viewed on a previous occasion. Neither Adform nor we store personal information such as e-mail addresses, names or addresses in the cookie or in the cookie-based profile.

A cookie is a small text file that is stored on your end device when you view an Adform client's advertisements or websites using a browser. The cookie does not collect any names, addresses, phone numbers, e-mail address or other data identifying the user. Instead, the cookie contains a random identification number (cookie ID). With these random cookie identification numbers, Adform collects and stores non-personal information such as operating system, browser version, geographical location, URLs on which Adform displays advertisements or facts about interactions with advertisements (e.g. number of clicks or views).

IP addresses of Internet users are accessible to our system during web requests on Adform web servers. However, we do not store or otherwise use this information.

To find out how Adform processes personal data when you use its services, please refer to the provider's privacy policy: <https://site.adform.com/privacy-center/platform-privacy/product-and-services-privacy-policy/>

Neither Adform nor we will share this information with third parties. The data will only be used for the analysis purposes described here.

### 2.17.1 Purpose of data processing

Adform is used to show you relevant ads on our website based on the products you have previously viewed.

### 2.17.2 Legal basis for data processing

The legal basis for the storage of cookies and similar technologies on your end device and their access (reading) is your consent pursuant to Paragraph 25 (1) TDDDG. The legal basis for the further processing of the personal data stored in your end device in this way is your consent given at the same time in accordance with Article 6 (1) (a) GDPR.

### 2.17.3 Storage duration

The cookies set by Adform on your browser expire 60 days after your last interaction. Adform does not keep any Cookie-based Information longer than 13 months. In other words, any data that can be related to your internet devices are deleted after maximum 13 months (see <https://site.adform.com/privacy-center/platform-privacy/product-and-services-privacy-policy/#HowlongdowestorePersonalInformation>).

### 2.17.4 Right of objection and removal/opt-out

You can deactivate the storage of the cookie ID on your end device for the delivery of advertisements via the Adform advertising platform at any time at the following address (opt out): <https://site.adform.com/privacy-center/website-privacy/opt-out/>.

This will delete all of Adform's cookie data from your device, leaving only a new cookie identifier on your device that indicates to Adform that your browser should not be tracked when ads are displayed in your browser. Please note that for technical reasons the opt-out only applies to the browser and device used to opt out.

You may also withdraw your consent at any time with effect for the future.

## 2.18 Use of Google reCAPTCHA

To protect the transmission of forms (e.g. contact form, registration for the internal member area)To ensure that we are not dealing with bots, we use the reCAPTCHA service in selected cases. reCAPTCHA is a captcha service that works in the background of websites to determine whether visitors are humans or computer programs.

The service provider of reCAPTCHA is Google Ireland Limited, Gordon House, Barrow Street Dublin 4. Ireland. Google Ireland Limited acts as a data processor on our behalf in accordance with Art. 28 GDPR. However, personal data may also be transferred to the parent company Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043. This company is based in the USA. There is an adequacy decision for data transfer to the USA. Accordingly, data transfer to the USA is legally permissible if the data recipient is certified under the EU-US and Swiss-US Privacy Shield (Data Privacy Framework), which is the case with Google LLC. In addition, Standard Contractual Clauses (SCC) of the European Commission are applied. The data is processed in accordance with the Cloud Data Processing Addendum, available at <https://cloud.google.com/terms/data-processing-addendum>.

For verification by reCAPTCHA, Google must collect hardware and software information, e.g. device and application data, and transmit it to Google for analysis purposes. In this way, Google reCAPTCHA collects, among other things, information about the page that integrates reCAPTCHA, the referrer URL (page from which the user comes), the user's IP address, device settings (language, browser, location), length of visit, mouse movements and keyboard strokes, screen and window resolution, time zone and installation of browser plugins.

In addition, Google reCAPTCHA also checks whether a cookie has already been created in your browser. If this is not the case, Google sets a corresponding third-party cookie.

The processing is carried out exclusively on our behalf and in accordance with our instructions. Google does not process the data for its own purposes.

Further information on data processing by Google can be found at: <https://policies.google.com/privacy>

### 2.18.1 Purpose of data processing

We use Google reCAPTCHA to prevent so-called bots, i.e. small malicious programs, from compromising the security and integrity of our website and web server. This helps us to ensure the functionality of the website. In addition, the data helps us to ensure the security of our information technology systems.

### 2.18.2 Legal basis for data processing

The legal basis for the storage of non-essential cookies on your device and access to them is your consent in accordance with Paragraph 25 (1) TDDDG. The legal basis for the further processing of personal data using non-essential cookies is Article 6 (1) (a) GDPR, i.e. your consent granted in accordance with the GDPR. If you do not grant your consent, the web forms protected by reCAPTCHA cannot be used. You can then contact us by other means.

### 2.18.3 Storage duration

As a user, you can decide for yourself whether to execute the JavaScript code required for the tool via your browser settings. You can deactivate or restrict the execution of JavaScript by changing the settings in your Internet browser. Note: If the execution of JavaScript is deactivated, it is possible that not all of the website's functions can be used to their full extent.

### 2.18.4 Right of objection and removal

You have the option of not using the Google reCAPTCHA service by not clicking on the service button. You can then contact us by other means, for example by email or telephone.

You can also disable JavaScript in your browser and thus prevent the transfer of data to Google. To prevent the execution of JavaScript code altogether, you can also install a JavaScript blocker, such as the browser plug-in NoScript (e.g. [www.noscript.net](http://www.noscript.net) or [www.ghostery.com](http://www.ghostery.com)). If the execution of JavaScript is disabled, you will not be able to use the reCAPTCHA service and thus our contact and web forms that use reCAPTCHA.

## 2.19 Use of The Newsletter Plugin in the blog section

Our website uses The Newsletter Plugin, a WordPress plug-in from Web Agile S.a.s. di Fietta Roberto, ViaTrieste 8, 36065, Mussolente, Vicenza.

Personal data is stored exclusively on our own web server. It is not passed on to the provider or any other third party.

Further information about data processing by The Newsletter Plugin can be found in the provider's privacy policy at <https://www.icegram.com/docs/category/icegram-express/data-stored-on-your-end/> and cookie policy at <https://www.thenewsletterplugin.com/legal/cookies>.

### 2.19.1 Purpose of data processing

The plug-in is used to enable users of our blog to subscribe to updates for certain categories, which they then receive by email.

So if a user is interested in the "Hot Topics" category on our blog, they can use the plug-in to subscribe to notifications that will then alert them to new postings on the blog by email.

To do this, the user enters their email address and the categories they wish to subscribe to in a web form. Whenever a new blog post is published in the selected categories, they will receive an automated email with a link to the post.

We use the email addresses collected in this way only in this context and for this purpose.

## 2.19.2 Duration of storage

We store the email addresses collected in this way until the user terminates the subscription, i.e. revokes the consent given.

## 2.19.3 Legal basis for data processing

The user's subscription constitutes consent to the processing of the email address for the stated purpose, so the legal basis is Article 6 (1) (a) GDPR (consent).

## 2.19.4 Right of objection and removal

The data processing described here can be avoided by not taking out a subscription to new blog posts.

## 2.20 Use of Reddit Ads and Reddit Pixel

On our website, we use the "Reddit Ads" service provided by Reddit Inc., 1455 Market Street, San Francisco, CA 94103, USA. Reddit Ads enables us to place targeted advertising on the Reddit platform and analyse its effectiveness.

For this purpose, we use a so-called Reddit pixel. This is a JavaScript code that is loaded when you visit our website. This pixel allows Reddit to track whether a user has reached our website via a Reddit advertisement and how they behave there (e. g., which pages they visit or whether a conversion has taken place). This is done using cookies or similar technologies.

The data processing is carried out by Reddit Inc. in the USA. Reddit relies on the standard contractual clauses of the EU Commission pursuant to Article 46 (2) (c) GDPR to ensure an adequate level of data protection.

You can find more information about data processing by Reddit and the Reddit Advertising Data Processing Agreement at:

- <https://business.reddithelp.com/s/article/Reddit-Advertising-Data-Processing-Agreement>
- <https://www.reddit.com/policies/privacy-policy>

### 2.20.1 Purpose of data processing

The processing serves to optimize our advertising campaigns, measure reach, and statistically evaluate our advertising measures on Reddit. The information collected by the pixel may be merged by Reddit with other information from the user's Reddit account, if one exists.

### 2.20.2 Legal basis for data processing

The legal basis for the use of the Reddit pixel is your consent in accordance with Article 6 (1) (a) GDPR, which we obtain via our cookie or consent banner. You can revoke your consent at any time with effect for the future.

### 2.20.3 Duration of storage

Reddit stores personal data for as long as necessary to fulfill the above-mentioned purposes. You can find detailed information on the storage period in Reddit's privacy policy.

### 2.20.4 Right to object and right to erasure

The data processing described here will not (or no longer) take place if you do not give your consent or if you withdraw your consent at a later date.

## 2.21 Data processing for the operation of a whistleblower platform

We operate a whistleblower platform that is freely accessible on the Internet and can be used to report unethical or illegal behaviour within or by our organisation - even completely anonymously. The platform can be accessed at <https://ptvgroup.share-a-hint.com>.

The platform is hosted by LegallInnovate Technologies GmbH, Issumer Tor 45, D-47608 Geldern as a sub-processor of our external data protection officer MeinDatenschutzPartner.de GbR Timo Schutt & Thomas Waetke, Kriegsstraße 37, 76133 Karlsruhe.

All data provided via the platform can only be viewed by a very small circle of authorised persons of the data controller (need-to-know principle).

There is no obligation for the whistleblower to provide any personal data as part of the information provided.

### 2.21.1 Purpose of data processing

The whistleblower platform enables whistleblowers, whether anonymous or named, to submit information in a secure area that draws our attention to unacceptable or undesirable behaviour within our organisation.

### 2.21.2 Legal basis for data processing

The data processing is carried out with regard to the establishment of the internal reporting centre for submitting a report within the material scope of the German Whistleblower Protection Act (HinSchG),

Paragraph 2 HinSchG, due to the legal obligation to establish an internal reporting centre and corresponding reporting channels in accordance with Paragraph 12 et seq. HinSchG in conjunction with the authorisation to process personal data by the reporting offices pursuant to Paragraph 10 HinSchG and thus within the scope of our legal obligation pursuant to Article 6 (1) (c) GDPR.

Insofar as we enable other reports via the whistleblower platform that go beyond the material scope of the HinSchG, e.g. those that relate to violations of our internal guidelines, such as our Code of Conduct or other comparable guidelines, this is done on the basis of our overriding legitimate interest pursuant to Article 6 (1) (f) GDPR, which can be seen in the fact that we want to and must fulfil our corporate responsibility to comply with the internal guidelines, which were created not least for the protection of our employees. In this case, the interests or fundamental rights and freedoms of the data subject, which require the protection of personal data, do not outweigh our legitimate interests.

### 2.21.3 Storage duration

In accordance with Paragraph 11 (5) HinSchG, all information provided must be documented. The documentation is deleted three years after the end of the procedure. However, records may be retained for a longer period in order to comply with the requirements of this Act or other legislation, as long as this is necessary and proportionate.

### 2.21.4 Right of objection and removal

The provision of information and the transmission of personal data to the internal reporting centre are entirely voluntary. You can avoid the data processing described here by refraining from entering and submitting personal data in connection with a report.

Where we process data on the basis of our legitimate interests, you have the right to object under Article 21 GDPR on grounds relating to your particular situation (see our information on the rights of data subjects).

## 2.22 Processing of personal data in the application process

For online job advertisements and applicant management, we use the services of rexx systems GmbH, Süderstrasse 75-79, D-20097 Hamburg (<https://www.rexx-systems.com/>). The service provider offers recruiting software that enables us to publish job vacancies directly online on a web platform. We have concluded a contract with the service provider for order processing in accordance with Art. 28 (3) GDPR, which grants us the right to issue instructions and in which the service provider undertakes to comply with all data protection regulations.

As part of the online application process, mandatory information is requested that is absolutely necessary for participation in the application process. In addition, further voluntary details and information may be provided.

Voluntary nature of the information / consequences of refusal: Data processing is necessary with regard to the mandatory information requested in order to be able to submit an application. If not all mandatory information is provided, participation in the application process is unfortunately not possible.

### 2.22.1 Purpose of data processing

The use of recruiting software enables us and applicants to quickly publish and find vacancies and to map the application process up to the interviews in a standardized, digital, and clear manner. The purpose is therefore to enable vacancies to be filled effectively and quickly.

### 2.22.2 Legal basis for data processing

Data processing in the application process is carried out as a pre-contractual measure with potential employees of the controller and therefore in accordance with Art. 6 (1) (b) GDPR.

### 2.22.3 Duration of data storage

Applicants' data is stored for a maximum of 4 months after completion of the specific application process and then deleted. If the applicant cannot be hired immediately but their profile is suitable for future job vacancies, we ask the applicant for their consent to further data storage for the purpose of later consideration on a case-by-case basis. This storage will take place until the applicant revokes their consent at the latest.

## 2.22.4 Right to object or request deletion

Data processing can be avoided by not participating in the online application process.

## 2.23 Use of ABlyft for A/B Testing

To conduct A/B tests on our website, we use “ABlyft” provided by Conversion Expert GmbH, Germany, Zeppelinring 52c, 24146 Kiel, Germany.

This enables us to test and evaluate different versions of our website in order to improve the user-friendliness and functionality of our online offering.

According to the provider, no personal data such as full IP addresses or unique user identifiers are stored in the process. Processing takes place exclusively in aggregated form on servers within the European Union.

Further information on data processing is available at <https://ablyft.com/en/features/data-protection-privacy>.

# 3 Rights of data subjects

If your personal data is being processed, you are the 'data subject' and you have the following rights in relation to us as the data controller:

## 3.1 Right of access

You have the right to obtain from us confirmation as to whether or not personal data concerning you is being processed. If this is the case, you have a right of access to this personal data and further information, which you can find in Article 15 GDPR. You can contact us by post or e-mail for this purpose.

## 3.2 Right to rectification

You have the right to obtain from us without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing mentioned above, you also have the right to have incomplete personal data completed, including by means of providing a supplementary statement. You can contact us by post or e-mail for this purpose.

## 3.3 Right to erasure

You have the right to obtain from us the erasure of personal data concerning you without undue delay if one of the requirements of Article 17 GDPR is met. You can contact us by post or e-mail for this purpose.

## 3.4 Right to restriction of processing

You have the right to obtain from us restriction of processing if one of the requirements of Article 18 GDPR applies. You can contact us by post or e-mail for this purpose.

### 3.5 Right to notification

If you exercise your right to rectification, erasure or restriction of processing against the controller, the controller is obliged to notify the rectification, erasure or restriction of processing to all recipients to whom the personal data concerning you have been disclosed, unless this proves impossible or involves disproportionate effort.

You are entitled to request that the controller inform you of these recipients.

### 3.6 Right to data portability

You have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you have the right to transmit this data to another controller without hindrance from us if the conditions of Article 20 GDPR are met. You can contact us by post or e-mail for this purpose.

### 3.7 Right to object to processing on legitimate interest grounds and to direct marketing

If, in exceptional cases, we process personal data on the basis of Article 6 (1) (f) GDPR (i.e. on the basis of legitimate interests), you have the right to object to the processing of your personal data by us at any time on grounds relating to your particular situation. If we cannot demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or if we are processing your data for the purposes of direct marketing, we will no longer process your data (see Article 21 GDPR). You can contact us by post or e-mail for this purpose.

An objection in this sense is also a technical method that you use, such as a clear technical information that your web browser sends to us ("do-not-track" message).

Where personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data relating to you for such marketing purposes, including profiling to the extent that it is related to such direct marketing.

### 3.8 Right to withdraw consent

You have the right to withdraw your consent to the collection and use of personal data at any time with effect for the future. You can contact us by post or e-mail for this purpose. This does not affect the lawfulness of the processing carried out on the basis of the consent until it is revoked.

### 3.9 Automated decision making including profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. Unless the decision is necessary for the conclusion or performance of a contract between you and us, it is authorised by the law of the Union or of the Member State to which we are subject and that law contains appropriate measures to safeguard your rights and freedoms and your legitimate interests, or the decision is taken with your express consent.

We do not make such automated decisions.

### 3.10 Voluntary nature of data provision

If we are required by law or contract to collect personal data, we will indicate this at the time the data is collected. Some of the information we collect

is necessary for us to enter into a contract with you, i.e. if we cannot or cannot adequately perform our contractual obligations to you. You are under no obligation to provide the personal information. However, failure to do so may mean that we are unable to provide or offer a service, action, measure or similar requested by you or that it is not possible to enter into a contract with you.

### 3.11 Right to lodge a complaint with a supervisory authority

Without prejudice to other rights, you have the right to lodge a complaint with a data protection supervisory authority at any time, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement, if you consider that the processing of personal data relating to you infringes data protection law.