

# Privacy Policy

Thank you for your interest in our company. Data protection is very important for the executive management of RHODIUS Schleifwerkzeuge GmbH & Co. KG. In principle it is possible to use the websites of RHODIUS Schleifwerkzeuge GmbH & Co. KG without providing any personal information. However, if a data subject wants to make use of the specific services of our company via our website, this will require some processing of personal data. If processing of personal data is required and there is no legal basis for such processing, we generally obtain the consent of the data subject.

The processing of personal data such as name, address, email address or telephone number of a data subject is always carried out in compliance with the EU General Data Protection Regulation and in accordance with the country-specific data protection provisions that apply to RHODIUS Schleifwerkzeuge GmbH & Co. KG. The objective of this Privacy Policy is for company to inform the general public of the nature, scope and purpose of the personal data collected, used and processed by us. This Privacy Policy also serves to explain to data subjects the rights to which they are entitled.

RHODIUS Schleifwerkzeuge GmbH & Co. KG, as the controller, has implemented numerous technical and organisational measures in order to ensure the most seamless protection possible of the personal data processed via this website. However, internetbased data transfers may have security gaps so absolute protection cannot be guaranteed. For this reason each data subject is free to transfer personal data to us in different ways, for example by telephone.

## 1. Definitions of terms

The privacy policy of RHODIUS Schleifwerkzeuge GmbH & Co. KG is based on the terminologies used by European Directives and Regulators in the adoption of the EU General Data Protection Regulation (GDPR). Our Privacy Policy has been created in order to be easy to read and understand both for the public domain and for our customers and business partners. To ensure this, we explain below the meanings of the terms used in this document.

In this Privacy Policy we use the following terms, amongst others:

### a) Personal Data

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

### b) Data Subject

A data subject is every identified or identifiable natural person whose personal data are processed by a controller.

### c) Processing

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

alignment or combination, restriction, erasure or destruction.

## **d) Restriction of processing**

Restriction of processing means the marking of stored personal data with the aim of restricting their processing in the future.

## **e) Profiling**

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

## **f) Pseudonymisation**

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

## **g) Controller**

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

## **h) Processor**

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

## **i) Recipient**

Recipient means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with European Union or Member State law shall not be regarded as recipients.

## **j) Third Party**

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

## **k) Consent**

Consent of each data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing

of personal data relating to him or her.

## **2. Name and address of the controller**

The controller within the meaning of the General Data Protection Regulation, other applicable data protection laws in the Member-States of the European Union and other provisions relating to data protection is:

RHODIUS Schleifwerkzeuge GmbH & Co. KG  
Brohltalstr. 2  
56659 Burgbrohl  
Germany  
Phone: +49 2636 920-400  
Email: [service\[at\]rhodius.de](mailto:service[at]rhodius.de)  
Website: <https://www.rhodius-abrasives.com>

## **3. Name and address of the data protection officer**

The data protection officer of the controller is:  
Simon Lenz

Email: [datenschutzbeauftragter\[at\]rhodius.de](mailto:datenschutzbeauftragter[at]rhodius.de)

Every data subject can contact our data protection officer at any time for questions and suggestions regarding data protection.

## **4. Cookies**

The websites of RHODIUS Schleifwerkzeuge GmbH & Co. KG use cookies. Cookies are text files that are filed and stored by a web browser on a computer system. Many websites and servers use cookies. Many cookies contain a cookie-ID. A cookie-ID is a unique identifier of the cookie. It consists of a character string through which websites and servers can be assigned to the specific internet browser in which the cookie was saved. This enables the visited websites and servers to differentiate the individual browsers of the data subjects from other internet browsers which contain other cookies. A specific internet browser can be recognised and identified again via the unique cookie-ID.

The use of cookies enables RHODIUS Schleifwerkzeuge GmbH & Co. KG to offer users of this website more user-friendly services that would not be possible without the setting of cookies.

Cookies are used to optimise the information and offers on our website for the user. Cookies enable us, as already mentioned, to recognise users of our website. The purpose of this recognition is to make it easier for users to use our website. The user of a website that uses cookies, does not, for example, have to re-enter his/her access data on each visit to the website because this is picked up by the website and by the cookie stored in the computer system of the user. Another example is the cookie of a shopping cart in an online shop. An online shop notes the items the customer has placed in the virtual shopping cart via a cookie.

The data subject can prevent the setting of cookies by our website at any time through a corresponding setting on the web browser used, thereby permanently revoking the setting of cookies. Furthermore, cookies that have already been set can be deleted at any time via a web browser or other software programs. This is possible in all common web browsers. If the data subject disables the cookie settings in the web browser used, it may not be possible to use the full functionality of our website.

## 5. Collection of general data and information

With every website access by a data subject or an automated system, the website of RHODIUS Schleifwerkzeuge GmbH & Co. KG collects a series of general data and information. This general data and information are saved in server log files. The following information types can be collected: (1) the browser types used and their versions, (2) the operating system used by the accessing system, (3) the website from which an accessing system accessed our website (known as referrer), (4) the sub-web pages used to reach our website via an accessing system, (5) the date and time of an access to our website, (6) an Internet Protocol address (IP-address), (7) the Internet Service Provider of the accessing system and (8) other similar data and information and information used to avert risks in the event of attacks on our information technology systems.

In the usage of this general data and information RHODIUS Schleifwerkzeuge GmbH & Co. KG draws no conclusions about the data subject. On the contrary, this information is needed, (1) to deliver the content from our website correctly, (2) to optimise the content of our website and its advertising, (3) to ensure the permanent functional operation of our information technology systems and the technology of our website and (4) to provide the information required for criminal prosecution purposes to the law enforcement authorities in the event of a cyber attack. These anonymously collected data and information are statistically evaluated by RHODIUS Schleifwerkzeuge GmbH & Co. KG and with the further objective of increasing data protection and data security in our company in order to ultimately secure an optimum protection level for personal data processed by us. The anonymised data of the server log files are stored separately from all personal data input by a data subject.

## 6. Routine erasure and blocking of personal data

The controller only processes and saves the personal data of the data subject for the period required to achieve the purpose of the save or if this is specified by European Directives and Regulators or another legislator in laws or provisions which the controller is subject to.

If the purpose of saving the data no longer applies or a storage period specified by European Directives and Regulators or another competent legislator expires, the personal data are routinely blocked or erased in accordance with the statutory provisions.

### 7. Rights of the data subject

#### a) Right for confirmation

Each data subject has the right granted by European Directives and Regulators to request a confirmation from the controller as to whether they are processing relevant personal data. If a data subject wants to exercise this right for confirmation, he or she can turn in this regard at any time to our data protection officer or to another employee of the controller.

#### b) Right of access

Each data subject whose personal data is being processed has at any time the right granted by European Directives and Regulators to have access to the information free of charge from the controller to the personal data saved regarding him/her as well as a copy of this information. Furthermore, European Directives and Regulators have granted that the data subject must have access to the following information:

- The processing purposes
- The categories of personal data that are being processed

- The recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations
- Where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period
- The existence of a right of rectification or erasure of the personal data concerning him/her or of the restriction of the processing by the controller or a right to object to this processing
- The right to lodge a complaint with a supervisory authority
- Where personal data have not been obtained from the data subject: all available information about the origin of the data
- The existence of automated decision-making, including profiling, referred to in GDPR Article 22 (1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

The data subject shall also have the right to be informed where personal data are transferred to a third country or to an international organisation. If this is the case the data subject shall also have the right to be informed of the appropriate safeguards relating to the transfer.

If a data subject wants to exercise this right of access, he or she can turn in this regard at any time to our data protection officer or to another employee of the controller.

### **c) Right to rectification**

Each data subject whose personal data is being processed shall have the right at any time granted by European Directives and Regulators without undue delay to the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall also have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

If a data subject wants to exercise this right to rectification he/she can turn in this regard at any time to our data protection officer or to another employee of the controller.

### **D) Right to erasure (right to be forgotten)**

Each data subject whose personal data is being processed shall have the right granted by European Directives and Regulators to demand the erasure of personal data concerning him or her from the controller without undue delay where one of the following grounds applies and the processing is no longer required:

- The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- The data subject withdraws consent on which the processing is based pursuant to GDPR Article 6 (1)(a), or Article 9 (2)(a), and where there is no other legal grounds for the processing.
- The data subject objects to the processing pursuant to GDPR Article 21 (1)

and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to GDPR Article 21 (2).

- The personal data have been unlawfully processed.
- The personal data have to be erased for compliance with a legal obligation in European Union or Member State law to which the controller is subject.
- The personal data have been collected in relation to the offer of information society services referred to in GDPR Article 8 (1).

Where one of the above grounds applies and a data subject wants to trigger the erasure of personal data stored by RHODIUS Schleifwerkzeuge GmbH & Co. KG, he/she can turn in this regard at any time to our data protection officer or to another employee of the controller. The data protection officer of RHODIUS Schleifwerkzeuge GmbH & Co. KG or another employee shall do what is required to comply with the erasure request without undue delay.

If personal data has been disclosed by RHODIUS Schleifwerkzeuge GmbH & Co. KG, and our company as a controller is obliged pursuant to GDPR Article 17 (1) to erase the personal data, then taking account of available technology and the costs of implementation, RHODIUS Schleifwerkzeuge GmbH & Co. KG shall take reasonable steps, including technical measures, to inform other controllers which are processing the disclosed personal data that the data subject has requested the erasure by such controllers of any links to, or copies or replications of, those personal data, provided that processing is not required. The data protection officer of RHODIUS Schleifwerkzeuge GmbH & Co. KG or another employee shall do what is required on a case-by-case basis.

## **e) Right to restriction of processing**

Each data subject whose personal data is being processed shall have the right granted by European Directives and Regulators to demand the restriction of processing where one of the following grounds applies:

- The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data.
- The processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead.
- The controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.
- The data subject has objected to processing pursuant to GDPR Article 21 (1) and it has not yet been verified whether the legitimate grounds of the controller override those of the data subject.

Where one of the above requirements applies and a data subject wants to request the restriction of processing of personal data stored by RHODIUS Schleifwerkzeuge GmbH & Co. KG, he/she can turn in this regard at any time to our data protection officer or to another employee of the controller. The data protection officer of RHODIUS Schleifwerkzeuge GmbH & Co. KG or another employee shall ensure the restriction of processing is carried out.

## **f) Right to data portability**

Each data subject whose personal data is being processed shall have the right granted by European Directives and Regulators to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format. The data subject shall also have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where the processing is based on consent pursuant to GDPR Article 6 (1)(a), or GDPR Article 9 (2)(a) or on an agreement pursuant to GDPR Article 6 (1)(b) and the processing is carried out by automated means; this shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Furthermore, in exercising his or her right to data portability pursuant to GDPR Article 20 (1), the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible and where it shall not adversely affect the rights and freedoms of others. To exercise the right to data portability the data subject can turn at any time to the appointed data protection officer at RHODIUS Schleifwerkzeuge GmbH & Co. KG or to another employee.

## **g) Right to object**

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

RHODIUS Schleifwerkzeuge GmbH & Co. KG shall no longer process the personal data, in the case of an objection, unless we demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims. Where RHODIUS Schleifwerkzeuge GmbH & Co. KG processes personal data for direct marketing purposes, the data subject shall have the right to object at any time to the processing of personal data concerning him or her for such marketing. This also includes profiling to the extent that it is related to such direct marketing. Where the data subject objects to RHODIUS Schleifwerkzeuge GmbH & Co. KG about the processing of personal data for the purposes of direct marketing, RHODIUS Schleifwerkzeuge GmbH & Co. KG shall no longer process the personal data for these purposes.

Furthermore, where personal data are processed for scientific or historical research purposes or statistical purposes pursuant to GDPR Article 89 (1), the data subject, on grounds relating to his or her particular situation, shall have the right to object to processing by RHODIUS Schleifwerkzeuge GmbH & Co. KG of personal data concerning him or her, unless such processing is necessary for the performance of a task carried out for reasons of public interest. To exercise the right to object the data subject can turn at any time to the data protection officer of RHODIUS Schleifwerkzeuge GmbH & Co. KG or to another employee. In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical specifications.

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

Each data subject whose personal data is being processed shall have the right granted by European Directives and Regulators not to be subject to a decision

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

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

If the data subject wants to exercise this right to automated decision-making he/she can turn in this regard at any time to our data protection officer or to another employee of the controller.

#### **i) Right to withdraw privacy consent**

Each data subject whose personal data is being processed shall have the right at any time granted by European Directives and Regulators to withdraw consent to the processing of personal data.

If the data subject wants to exercise this right to withdraw privacy consent he/she can turn in this regard at any time to our data protection officer or to another employee of the controller.

### **8. Privacy provisions when installing and using Facebook**

The controller has integrated components of the company Facebook on this website. Facebook is a social network.

A social network is a social meeting place and an online community operated via the internet which generally enables its users to communicate with each other and interact in a virtual space. A social network can be used as a platform to exchange opinions and experiences and it also enables the internet community to provide personal or company-related information. Facebook enables the users of the social network, amongst other things, to set up private profiles, upload photos and network via friend requests. The operating company of Facebook is Facebook, Inc., 1 Hacker Way, Menlo Park, CA 94025, USA. The controller for personal data if a data subject lives outside of the USA or Canada is Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

Each time one of the individual pages of this website operated by the controller is accessed and into which a Facebook component (Facebook plugin) has been integrated, this relevant Facebook component prompts the web browser on the information technology system of the data subject to automatically download a representation of the corresponding Facebook component from Facebook. A total overview of all Facebook plugins can be viewed at [https://developers.facebook.com/docs/plugins/?locale=de\\_DE](https://developers.facebook.com/docs/plugins/?locale=de_DE). As part of this technical procedure, Facebook is informed about which specific sub-page of our website has been visited by the data subject.

If the data subject is also logged into Facebook at the same time, Facebook recognises with every access to our website by the data subject, and for the entire duration of the



respective visit to our website, which specific sub-page of our website is visited by the data subject. These pieces of information are collected by the Facebook component and assigned by Facebook to the respective Facebook account of the data subject. If the data subject presses one of the Facebook buttons integrated into our website such as the "Like" button, or if the data subject enters a comment, Facebook assigns this information to the personal Facebook user account of the data subject and saves these personal data. Facebook then always receives information via the Facebook components that the data subject has visited our website if the data subject is also logged into Facebook at the time of accessing our website; this takes place irrespective of whether the data subject has clicked on the Facebook component or not. If the data subject does not want such a transfer of this information to Facebook, the data subject can prevent this by logging out of their Facebook account before accessing our website.

The data privacy guideline published by Facebook which can be viewed at <https://dede.facebook.com/about/privacy/> provides information about the collection, processing and use of personal data. It further states the specific privacy settings Facebook offers the data subject. A range of applications are also available which enable data transfer to Facebook to be suppressed. Such applications can be used by the data subject to suppress a data transfer to Facebook.

Facebook has responded to the CJEU ruling on the joint responsibility of Facebook and fan page administrators by publishing a Page Controller Addendum to its Terms of Service. The Addendum is available at [www.facebook.com/legal/terms/page\\_controller\\_addendum#](http://www.facebook.com/legal/terms/page_controller_addendum#):

## **Facebook Page Insights Controller Addendum**

Facebook provides [Page Insights](#) for our Page. Page Insights are aggregated data that can help us understand how people are engaging with our Page. To provide more information about the Page Insights available to us in connection with our Page, we use the Insights tab on our Page.

Page Insights may be based on personal data collected in connection with a visit or interaction of people on or with our Page and its content. As we are in the European Union/European Economic Area and to the extent this personal data is processed under our influence and control (or any other third party's influence or control for whom we are creating or administering the Page) within the scope of the General Data Protection Regulation (Regulation (EU) 2016/679, "GDPR"), ("Insights Data"), we acknowledge and agree on our own behalf (and as agent for and on behalf of any other third-party data controller for which we are creating or administering the Page) that this Page Insights Controller Addendum ("Page Insights Addendum") applies:

- Facebook Ireland Limited ("Facebook Ireland") and we are joint controllers for the processing of Insights Data. This Page Insights Addendum sets out the relative responsibilities of Facebook Ireland and us with respect to the processing of Insights Data.

- Facebook Ireland agrees to take primary responsibility under the GDPR for the processing of Insights Data and to comply with all applicable obligations under GDPR with respect to the processing of Insights Data (including, but not limited to, Articles 12 and 13 GDPR, Articles 15 to 22 GDPR, and Articles 32 to 34 GDPR). Facebook Ireland will also make the essence of this Page Insights Addendum available to data subjects.

- We ensure that we have a legal basis for the processing of Insights Data under GDPR, identify the data controller for the Page and comply with any other applicable legal obligations.

- We agree that only Facebook Ireland may take and implement decisions about the processing of Insights Data. Facebook Ireland decides in its sole discretion how to comply with its obligations under this Page Insights Addendum. We agree that Facebook Ireland is the main establishment in the EU for the processing of Insights Data for all data controllers and acknowledge that the lead supervisory authority for this processing is the Irish Data Protection Commission.

- Facebook Ireland remains solely responsible for the processing of personal data in connection with Page Insights other than that covered by the scope of this Page Insights Addendum. This Page Insights Addendum does not grant us any right to request the disclosure of personal data of Facebook users that is processed in connection with Facebook Products, including for Page Insights that Facebook provides to us.

- If we are contacted by data subjects or a supervisory authority under the GDPR with regard to the processing of Insights Data and the obligations assumed by Facebook Ireland under this Page Insights Addendum (each a "Request"), we must forward all relevant information to Facebook Ireland promptly but within a maximum of 7 calendar days. For this purpose, we can submit [this form](#). Facebook Ireland will answer Requests in accordance with its obligations under this Page Insights Addendum. We agree to take all reasonable endeavours in a timely manner to cooperate with Facebook in answering any such Request. We are not authorized to act or answer on Facebook Ireland's behalf.

- If we access or use a Page for any business or commercial purpose (including but not limited to managing a Page for a business), we agree that any claim, cause of action or dispute we have against Facebook that arises out of or relates to this Page Insights Addendum must be resolved exclusively in the courts of Ireland, that we irrevocably submit to the jurisdiction of the Irish courts for the purpose of litigating any such claim and that the laws of Ireland will govern this Page Insights Addendum.

- Facebook may need to update this Page Insights Addendum from time to time so Facebook encourages us to check it regularly for any updates. By continuing any access or use of Pages after any notice of an update to this Page Insights Addendum, we agree to be bound by it. If we do not agree to the updated Page Insights Addendum, we must stop all use of Pages. As we are a business with permanent residence in a Member State of the European Union, only 4.1 of the Facebook Terms of Service applies to updates to this Page Insights Addendum.

- If any portion of this Page Insights Addendum is found to be unenforceable, the remaining portion will remain in full force and effect. If Facebook fails to enforce any portion of this Page Insights Addendum, it will not be considered a waiver. Any amendment to or waiver of these Terms must be made in writing and signed by Facebook.

- "personal data", "data subject" and "data controller" in this Page Insights Addendum have the meanings set out in the GDPR.

## **9. Privacy provisions when installing and using Google Analytics (with anonymisation function)**

The controller has integrated the Google Analytics component (with anonymisation function) on this website. Google Analytics is a web analysis service. Web analysis is the collection, compilation and evaluation of website user behavioural data. A web analysis service also collects data about the website from which a data subject arrived at a specific web page (known as referrer), which sub-pages of the website were accessed or how often and for what period a sub-page was viewed. A web analysis is primarily used

to optimise a website and for a cost-benefit analysis of internet advertising. The operating company of the Google Analytics component is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA.

The controller uses the suffix "\_gat.\_anonymizeIp" for web analysis using Google Analytics. Using this suffix the IP address of the internet connection of the data subject is truncated and anonymised by Google in the event of access to our website from a Member-State of the European Union or from another signatory state to the agreement on the European Economic Area.

The purpose of the Google Analytics component is to analyse visitor flows to our website. Google uses the data and information obtained, amongst other things, to evaluate the use of our website, to compile online reports for us about activities on our websites and to provide further services associated with the use of our website.

Google Analytics sets a cookie in the information technology system of the data subject. Cookies have already been explained above. Setting a cookie enables Google to analyse use of our website. Each time one of the individual pages of this website operated by the controller is accessed and into which a Google Analytics component has been integrated, this relevant Google Analytics component prompts the web browser on the information technology system of the data subject to automatically transfer data for the purpose of online analysis to Google. As part of this technical procedure, Google is informed of personal data such as the IP address of the data subject and Google then uses this, amongst other things, to track the origin of visitors and clicks and then as a consequence to enable commission calculations.

Cookies are used to save personal information such as access time, the location from where the access originated and the frequency of visits to our website by the data subject. For each visit to our websites these personal data including the IP address of the internet connection used by the data subject are transferred to Google in the United States of America. These personal data are saved by Google in the United States of America. Google forwards the personal data collected via the technical procedure to third parties under certain circumstances.

As already stated above, the data subject can prevent the setting of cookies by our website at any time through a corresponding setting in the web browser used, thereby permanently revoking the setting of cookies. Such a setting of the web browser used would also prevent Google setting a cookie in the information technology system of the data subject. Furthermore, a cookie that has already been set by Google Analytics can be deleted at any time via the web browser or by other software programs.

The data subject also has the possibility of objecting to and preventing the collection of data related to use of this website generated by Google Analytics as well as to the processing of these data by Google. To do this the data subject must download and install the browser add-on under the link <https://tools.google.com/dlpage/gaoptout>. This browser add-on informs Google Analytics via JavaScript that no data and information related to the website visits are permitted to be transmitted to Google Analytics. The installation of the browser add-on is assessed by Google as an objection. If the information technology system of the data subject is deleted, formatted or reinstalled at a subsequent point in time, the data subject must reinstall the browser add-on in order to disable Google Analytics. If the browser add-on is deinstalled or disabled by the data subject or by another person with the attributable sphere of influence, the browser add-on can be reinstalled or reactivated again.

More information and the applicable Google privacy policies can be viewed at <https://www.google.de/intl/de/policies/privacy/> and at <http://www.google.com/analytics/terms/de.html>. Google Analytics is explained in more

detail in this link [https://www.google.com/intl/de\\_de/analytics/](https://www.google.com/intl/de_de/analytics/).

## **10. Privacy provisions when installing and using Google AdWords**

The controller has integrated Google AdWords into this website. Google AdWords is an internet advertising service that permits advertisers to activate adverts in Google search engine results and in the Google advertising network. Google AdWords enables advertisers to define specific keywords in advance, by means of which an advert will then be displayed in the Google search engine results when the user retrieves a keywordrelevant search result in the search engine. In the Google advertising network, adverts are distributed to thematically relevant websites using an automatic algorithm and the previously defined keywords.

The operating company of the services of Google AdWords is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA.

The purpose of Google AdWords is the advertisement of our website by displaying interest-relevant advertising on the websites of third-companies and in search engine results of the Google search engine and by displaying third-party advertising on our website.

If the data subject accesses our website via a Google advert, a conversion cookie will be filed in the information technology system of the data subject by Google. Cookies have already been explained above. A conversion cookie is no longer valid after thirty days and is not used to identify the data subject. The conversion cookie, provided it has not yet expired, is used to trace whether certain sub-pages, such as the shopping cart of an online shop system, were accessed on our website. The conversion cookie enables both us and Google to track whether a data subject who has accessed our website via an AdWords advert has generated revenue, i.e. has completed or cancelled a purchase of goods.

The data and information collected through the use of the conversion cookie is used by Google to generate visit statistics for our website. We then use these visit statistics to determine the total number of users who have been referred to us via AdWords adverts, i.e. to determine the success or failure of the respective AdWords advert and to optimise our AdWords ads for the future. Neither our company nor other Google AdWords advertisers receive information from Google that could identify the data subject.

The conversion cookie stores personal information, such as the web pages visited by the data subject. Accordingly for each visit to our websites these personal data including the IP address of the internet connection used by the data subject are transferred to Google in the United States of America. These personal data are saved by Google in the United States of America. Google forwards the personal data collected via the technical procedure to third parties under certain circumstances.

As already stated above, the data subject can prevent the setting of cookies by our website at any time through a corresponding setting in the web browser used, thereby permanently revoking the setting of cookies. Such a setting on the web browser used would also prevent Google setting a conversion cookie in the information technology system of the data subject. Furthermore, a cookie that has already been set by Google AdWords can be deleted at any time via the web browser or by other software programs. The data subject also has the possibility of objecting to interest-based advertising by Google. To do this, the data subject must call up each of the web browsers used from the link [www.google.de/settings/ads](http://www.google.de/settings/ads) and set the desired settings there.

More information and the applicable Google privacy policies can be viewed at <https://www.google.de/intl/de/policies/privacy/>.

## 11. Privacy provisions when installing and using LinkedIn

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

The operating company of LinkedIn is LinkedIn Corporation, 2029 Stierlin Court Mountain View, CA 94043, USA. For privacy matters outside the USA, responsibility is assumed by LinkedIn Ireland, Privacy Policy Issues, Wilton Plaza, Wilton Place, Dublin 2, Ireland. For each visit to our website that has been set up with a LinkedIn component (LinkedIn plugin) this component prompts the browser used by the data subject to download a representation of the corresponding LinkedIn component. More information on LinkedIn plugins can be viewed at <https://developer.linkedin.com/plugins>. As part of this technical procedure, LinkedIn is informed which specific sub-page of our website has been visited by the data subject.

If the data subject is also logged into LinkedIn at the same time, LinkedIn recognises with every access to our website by the data subject, and for the entire duration of the respective visit to our website, which specific sub-page of our website is visited by the data subject. These pieces of information are collected by the LinkedIn component and assigned by LinkedIn to the respective LinkedIn account of the data subject. If the data subject presses a LinkedIn button integrated into our website, LinkedIn assigns this information to the personal LinkedIn user account of the data subject and saves these personal data.

LinkedIn then always receives information via the LinkedIn component that the data subject has visited our website if the data subject is also logged into LinkedIn at the time of accessing our website; this takes place irrespective of whether the data subject has clicked on the LinkedIn component or not. If the data subject does not want such a transfer of this information to LinkedIn, the data subject can prevent this transfer by logging out of their LinkedIn account before accessing our website.

LinkedIn offers the possibility at <https://www.linkedin.com/psettings/guest-controls> of unsubscribing from email messages, SMS messages and targeted adverts and of managing advertisement settings. LinkedIn also uses partners such as Quantcast, Google Analytics, BlueKai, DoubleClick, Nielsen, Comscore, Eloqua and Lotame who may set cookies. Such cookies can be rejected at <https://www.linkedin.com/legal/cookie-policy>. The applicable privacy policies of LinkedIn can be viewed at <https://www.linkedin.com/legal/privacy-policy>. The LinkedIn cookie guideline can be viewed at <https://www.linkedin.com/legal/cookie-policy>.

## 12. Privacy provisions when installing and using Xing

The controller has integrated Xing components on this website. Xing is an internet-based social network that enables users to connect with existing business contacts and to make new business contacts. Individual users can create a personal profile on XING. Companies can, for example, create company profiles or publish job vacancies on Xing. The operating company of Xing is XING SE, Dammtorstraße 30, 20354 Hamburg, Germany.

Each time one of the individual pages of this website operated by the controller is accessed and into which a Xing component (Xing plugin) has been integrated, this relevant Xing component prompts the web browser on the information technology system of the data subject to automatically download a representation of the corresponding Xing component from Xing. More information on Xing plugins can be viewed at

<https://dev.xing.com/plugins>. As part of this technical procedure, Xing is informed which specific sub-page of our website has been visited by the data subject.

If the data subject is also logged into Xing at the same time, Xing recognises with every access to our website by the data subject, and for the entire duration of the respective visit to our website, which specific sub-page of our website is visited by the data subject. These pieces of information are collected by the Xing component and assigned by Xing to the respective Xing account of the data subject. If the data subject presses a Xing button integrated into our website, such as the "Share" button, Xing assigns this information to the personal Xing user account of the data subject and saves these personal data. Xing then always receives information via the Xing component that the data subject has visited our website if the data subject is also logged into Xing at the time of accessing our website; this takes place irrespective of whether the data subject has clicked on the Xing component or not. If the data subject does not want such a transfer of this information to Xing, the data subject can prevent this transfer by logging out of their Xing account before accessing our website.

The data privacy guideline published by Xing, which can be viewed at <https://www.xing.com/privacy> provides information about the collection, processing and use of personal data by Xing. Furthermore, Xing has published its privacy guideline for the XING Share button at [https://www.xing.com/app/share?op=data\\_protection](https://www.xing.com/app/share?op=data_protection).

### **13. Privacy provisions when installing and using YouTube**

The controller has integrated YouTube components on this website. YouTube is an internet video-portal that enables video publishers to create video clips free-of-charge and gives other users the opportunity to also watch, evaluate and comment on these video clips free-of-charge. YouTube permits the publication of all types of videos which is why complete film and television programmes, music videos, trailers or videos produced by users themselves can be viewed via the internet portal.

The operating company of YouTube is YouTube, LLC, 901 Cherry Ave., San Bruno, CA 94066, USA. YouTube, LLC is a subsidiary of Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA.

Each time one of the individual pages of this website operated by the controller is accessed and into which a YouTube component (YouTube-Video) has been integrated, this relevant YouTube component prompts the web browser on the information technology system of the data subject to automatically download a representation of the corresponding YouTube component from YouTube. More information on YouTube can be viewed at <https://www.youtube.com/yt/about/de/>. As part of this technical procedure, YouTube and Google are informed which specific sub-page of our website has been visited by the data subject.

If the data subject is also logged into YouTube at the same time, YouTube recognises with the access to a sub-page which contains a YouTube video which specific sub-page of our website is visited by the data subject. These pieces of information are collected by YouTube and Google and assigned to the respective YouTube account of the data subject. YouTube and Google then always receive information via the YouTube component that the data subject has visited our website if the data subject is also logged into YouTube at the time of accessing our website; this takes place irrespective of whether the data subject has clicked on the YouTube component or not. If the data subject does not want such a transfer of this information to YouTube and Google, the data subject can prevent this transfer by logging out of their YouTube account before accessing our website.

The data privacy guidelines published by YouTube which can be viewed at <https://www.google.de/intl/de/policies/privacy/> provide information about the collection, processing and use of personal data by YouTube and Google.

## **14. Legal basis of the processing**

GDPR Article 6 (1)(a) serves as the legal basis for our company for processing operations where we obtain consent for a specific processing purpose. If the processing of personal data is required to perform a contract where the contractual party is the data subject, as this is for example in processing operations required for a delivery of goods or the provision of any other service or return service, then the legal basis for the processing is GDPR Article 6 (1)(b). The same applies for such processing operations necessary prior to entering into a contract, for instance in cases of enquiries into our products and services. If our company is subject to a legal obligation due to which processing of personal data is necessary, such as for the fulfilment of taxation obligations, the processing is based on GDPR Article 6 (1)(c). In rare cases the processing of personal data may be required to protect the vital interests of the data subject or another natural person. For example this would be the case if a visitor were to be injured in our company and when his/her name, age, health insurance company data or other vital information had to be forwarded to a doctor, hospital or other third party. Then the processing would be based on GDPR Article 6 (1)(d). Finally processing operations could be based on GDPR Article 6 (1)(f). Based on this legal basis are processing operations which are not covered by any of the preceding legal bases, when the processing is necessary to safeguard a legitimate interest of our company or a third party, unless the interests, basic rights and basic freedoms of the data subject are overriding. Such processing operations are permissible for us in particular because they are mentioned specifically by the European legislator. It represented the view that accepting a legitimate interest could be when the data subject is a client of the controller (GDPR Recital 47, Sentence 2).

## **15. Legitimate interests in the processing performed by the controller or a third-party**

If the processing of personal data is based on GDPR Article 6 (1)(f), our legitimate interest is the performance of our business activities for the benefit of all our employees and shareholders.

## **16. The period for which personal data will be stored**

The criterion used to determine the storage period of personal data is the respective legal retention period. Upon expiry of the period the relevant data are routinely erased provided that they are no longer required to fulfil or progress the contract.

## **17. Statutory or contractual provisions for the provision of personal data; requirement for concluding a contract; obligation of the data subject to provide personal data; possible consequences of failure to provide such data**

We hereby inform you that the provision of personal data is partially legally prescribed (e.g. taxation provisions) or can arise due to contractual rules (e.g. details of the contractual partners). Sometimes when concluding a contract a data subject will need to provide personal data that will subsequently be processed by us. For example, a data subject is obliged to provide us with personal data when our company concludes a contract with it. In this regard failure to provide personal data would make it impossible to conclude the contract with the data subject. Before any provision of personal data by the data subject, the data subject must consult our data protection officer. Our data protection officer will explain to the data subject on a case-by-case basis whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the data subject is obliged to provide the personal data and of the possible consequences of failure to provide such data.

## **18. Existence of automated decision-making**

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

As at: 2019/04/11