

# Privacy Policy

## 1. Introduction

With this privacy policy, Planerio GmbH (hereinafter also referred to as "Planerio" or "we") informs you about the nature, scope and purpose of the processing of personal data (hereinafter also referred to as "data") within our digital duty scheduling platform and related websites (e.g. [www.planerio.de](http://www.planerio.de), [www.planer.io](http://www.planer.io)) as well as related local and mobile applications, features and content, and external online presences, such as our social media profiles (hereinafter collectively referred to as "Online Offer"). With regard to the terminology used (e.g. "processing", "controller", etc.), we refer to the definitions according to Art. 4 of the European Data Protection Regulation (hereinafter referred to as "GDPR").

Our online offering enables you to perform duty and personnel planning, time recording and payroll accounting digitally. As a user of our online service, you and the company for which you work (hereinafter also referred to as "Company" or "Customer") can store and manage the data required for duty planning, time recording and payroll accounting. Each user has his or her own access with different rights and options for entering and retrieving data. The use of our online offer requires the processing of personal data by Planerio.

Planerio uses personal data in accordance with the provisions of the DSGVO, the Federal Data Protection Act (hereinafter referred to as "BDSG") and the Telemedia Act (hereinafter referred to as "TMG"). Planerio takes care to comply with the currently applicable security standards. The hosting servers used by Planerio are located in Germany and the providers are certified according to DIN ISO/IEC 27001.

## 2. Responsible Person and Data Protection Officer

### **Company:**

Planerio GmbH  
Gewürzmühlstr. 11  
80538 Munich  
E-mail: [info@planerio.de](mailto:info@planerio.de)

Managing directors: Torsten Blaschke, Dr. Stefan Klußmann, Silke Oltrogge, Prof. Dr. Cai-Nicolas Ziegler

### **Data Protection Officer:**

Data Protection Officer of Planerio GmbH  
c/o TÜV SÜD Akademie GmbH  
Westendstraße 160  
80339 Munich, Germany  
E-mail: [datenschutz@planerio.de](mailto:datenschutz@planerio.de)  
[www.tuvsud.com](http://www.tuvsud.com)

## 3. Basics of Data Processing

### 3.1 Categories of data subjects

Visitors and users of the online offer as well as customers, interested parties and business partners as well as employees and applicants (hereinafter also referred to individually and collectively as "users").

### 3.2 Types of Data Processed

In order to provide our online offer, we process the following data from our users:

- Inventory data (e.g., names, addresses).
- Contact data (e.g. e-mail, telephone numbers).
- Content data (e.g. text entries, uploaded documents).
- Usage data (e.g. websites visited, interest in content, access times).
- Meta/communication data (e.g. device information, IP addresses).

For the purpose of providing contractual services, service and customer care, marketing, advertising and market research, applicant management, we additionally process from our users:

- Contractual data (e.g. subject matter of the contract, term, customer category),
- general personal data (e.g. surname and first name) and (business) contact data (e.g. address, e-mail address, telephone number) of contact persons
- Payment data (e.g. bank details, payment history)
- Duty roster data (e.g., working hours, vacation, training, and other absences, qualifications, assignment preferences, and duty requests).
- Working time documentation and payroll data (e.g., time stamps, absences including reason, pay/salary, overtime arrangements).
- Applicant data (e.g. personal details, postal and contact addresses, the documents belonging to the application and the information contained therein, such as cover letter, curriculum vitae, certificates, as well as other information provided with regard to a specific position or voluntarily by applicants concerning their person or qualifications).
- Location data (information on the geographical position of a device or person).

### 3.3 Purpose of the Processing

- Providing Planerio's services to customers, including all processes necessary for this, including making the online offer, its functions and content available.
- Answering contact requests and communication with users.
- Security measures.
- Reach and conversion measurement/marketing.
- Assertion, exercise, or defense of civil claims.
- Implementation of application procedures.

### *3.4 Provision of Data to Affiliated Companies*

In order to provide Planerio's services to customers, including all processes required for this purpose, general personal data (e.g. surname and first name) and (business) contact data (e.g. address, email address, telephone number) of contact persons are provided to companies affiliated with Planerio according to §§ 15 ff. AktG (German Stock Corporation Act) (e.g. doctari GmbH, Viantro GmbH; hereinafter also referred to as "doctari group").

The legal basis for the provision of data to companies of the doctari group is the legitimate interest of Planerio (Art. 6 para. 1 sentence 1 lit. f) DSGVO) in providing the data in order to set up and maintain a group structure that is as efficient as possible and to offer the services of Planerio and the doctari group throughout the group; Planerio bases this legitimate interest in the context of the company sale that has taken place, in particular on the fact that only the shareholding ratios have changed and the company will be continued in an essentially identical manner. Planerio has a legitimate interest in processing the data to offer customers the best possible and most comprehensive service as a service throughout the Group and to fulfill customer wishes or needs - also beyond the services offered by Planerio - in the best possible way.

If the processing is based on Art. 6 (1) sentence 1 lit. f) DSGVO, the data subject has the right to object pursuant to Art. 21 DSGVO. Planerio shall then no longer process the personal data, unless Planerio can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims by Planerio.

### *3.5 Terminology*

"Personal data" means any information relating to an identified or identifiable natural person (hereinafter referred to as "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 (e.g. cookie) or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

"Processing" means any operation or set of operations which is performed upon personal data, whether or not by automatic means. The term is broad and includes virtually any handling of data.

"Pseudonymization" means the processing of personal data in such a way 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 organizational measures which ensure that the personal data are not attributed to an identified or identifiable natural person.

"Profiling" means any automated processing of personal data which consists in using such personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects relating to that natural person's performance at work, economic

situation, health, personal preferences, interests, reliability, behavior, location or change of location.

The term "controller" refers to 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.

The term "processor" refers to a natural or legal person, public authority, agency, or other body which processes personal data on behalf of the controller.

"Location data" is generated when a mobile device (or other device with the technical requirements of location determination) connects to a radio cell, a WLAN or similar technical means and functions of location determination. Location data is used to indicate the geographically determinable position on earth at which the respective device is located. Location data can be used, for example, to display map functions or other information dependent on a location.

### *3.6 Relevant Legal Bases*

In accordance with Art. 13 DSGVO, we inform you about the legal basis of our data processing. If the legal basis is not mentioned in the privacy policy, the following applies: The legal basis for obtaining consent is Art. 6(1)(a) and Art. 7 DSGVO; the legal basis for processing to fulfill our services and carry out (pre-)contractual measures and respond to inquiries is Art. 6(1)(b) DSGVO; the legal basis for processing to fulfill our legal obligations is Art. 6(1)(b) DSGVO; the legal basis for processing to fulfill our legal obligations is Art. 6(1)(c) DSGVO. c DSGVO; the legal basis for processing to protect our legitimate interests is Art. 6 para. 1 lit. f DSGVO; the legal basis required for processing to assert, exercise or defend civil claims is Section 24 para. 1 no. 2 BDSG; and the legal basis for processing in the context of application procedures is Section 26 BDSG or Art. 6 para. 1 lit. b. DSGVO, Art. 6 para. 1 lit. f. DSGVO.

### *3.7 Safety Measures*

We take appropriate technical and organizational measures to ensure a level of protection appropriate to the risk in accordance with Article 32 of the GDPR, considering the state of the art, the costs of implementation and the nature, scope, circumstances and purposes of the processing, as well as the varying likelihood and severity of the risk to the rights and freedoms of natural persons.

The measures include safeguarding the confidentiality, integrity and availability of data by controlling physical access to the data, as well as the access, input, transfer, safeguarding of availability and its separation. Furthermore, we have established procedures to ensure the exercise of data subjects' rights, deletion of data, and response to data compromise. Furthermore, we already take the protection of personal data into account in the development and selection of hardware, software and processes, in accordance with the principle of data protection through technology design and through data protection-friendly default settings (Article 25 of the GDPR).

Insofar as IP addresses are processed by us or by our service providers and the processing of a complete IP address is not required, the IP address is shortened (hereinafter referred to as "IP masking"). In this process, the last part of the IP address is removed or replaced by wildcards. The shortening of the IP address is intended to prevent identification by means of the IP address or to make it significantly more difficult.

To protect data transmitted via our online offer, we use SSL encryption, recognizable by the prefix "https://" in the address line of your browser.

### *3.8 Rights of the Data Subjects*

You have the right to request confirmation as to whether data in question is being processed and to information about this data, as well as further information and a copy of the data in accordance with Art. 15 of the GDPR.

You have according to Art. 16 DSGVO the right to request the completion of the data concerning you or the correction of incorrect data concerning you.

You have the right, in accordance with Art. 17 GDPR, to request that data concerning you be deleted without undue delay, or alternatively, in accordance with Art. 18 GDPR, to request restriction of the processing of the data.

You have the right to request that the data concerning you that has been provided to us be received in accordance with Art. 20 GDPR and to request its transfer to other data controllers.

You also have the right to lodge a complaint with the competent supervisory authority in accordance with Art. 77 DSGVO.

### *3.9 Right of Revocation*

You have the right to revoke given consents according to Art. 7 (3) DSGVO with effect for the future.

### *3.10. Right of Objection*

You may object at any time to the (future) processing of data based on Article 6 (1) (e) or (f) in accordance with Article 21 DSGVO. The objection can be made against processing for direct marketing purposes. In the event of the objection, Planerio shall no longer process the personal data, unless Planerio can demonstrate compelling legitimate grounds for the processing which override the interests, rights, and freedoms of the data subject, or for the assertion, exercise or defense of legal claims by Planerio.

### *3.11. Deletion of Data*

The data processed by us will be deleted or restricted in its processing in accordance with Articles 17 and 18 DSGVO. Unless expressly stated within the scope of this data protection declaration, the data stored by us will be deleted as soon as they are no longer required for

their intended purpose and the deletion does not conflict with any statutory retention obligations. If the data is not deleted because it is required for other and legally permissible purposes, its processing will be restricted. I.e. the data is blocked and not processed for other purposes. This applies, for example, to data that must be retained for reasons of labor, commercial or tax law, or in cases where the processing of the data is necessary for the assertion, exercise or defense of legal claims or to protect the rights of another natural or legal person.

According to legal requirements in Germany, the data is stored for 10 years in accordance with §§ 147 para. 1 AO, 257 para. 1 nos. 1 and 4, para. 4 HGB (books, records, management reports, accounting vouchers, commercial books, documents relevant for taxation, etc.) and 6 years in accordance with § 257 para. 1 nos. 2 and 3, para. 4 HGB (commercial letters).

### *3.12. Contractual Services*

We process the data of our contractual partners and interested parties as well as other clients, customers, customers, clients, or contractual partners (hereinafter each individually and collectively referred to as "contractual partners") in accordance with Art. 6 (1) lit. b) DSGVO in order to provide our contractual or pre-contractual services to them. The data processed in this context, the type, scope and purpose and the necessity of their processing, are determined by the underlying contractual relationship.

The data processed includes the master data of our contractual partners (e.g. names and addresses), contact data (e.g. e-mail addresses and telephone numbers) as well as contractual data (e.g. services used, contract contents, contractual communication, names of contact persons) and payment data (e.g. bank details, payment history)

As a matter of principle, we do not process special categories of personal data, unless these are components of a commissioned or contractual processing.

We process data that are required for the justification and fulfillment of contractual services and point out the necessity of their disclosure unless this is evident to the contractual partners. Disclosure to external persons or companies is made only if it is necessary in the context of a contract. When processing data provided to us in the context of an order, we act in accordance with the instructions of the client as well as the legal requirements

In the context of the use of our online services, we may store the IP address and the time of the respective user action. The storage is based on our legitimate interests, as well as the interests of users to protect against misuse and other unauthorized use. In principle, this data is not passed on to third parties, unless it is necessary for the pursuit of our claims pursuant to Art. 6 para. 1 lit. f. DSGVO or there is a legal obligation to do so pursuant to Art. 6 para. 1 lit. c. DSGVO. DSGVO.

The deletion of the data takes place when the data is no longer required for the fulfillment of contractual or legal duties of care as well as dealing with any warranty and comparable

obligations, whereby the necessity of the retention of the data is reviewed every three years; otherwise, the legal retention obligations apply.

## 4. Cooperation with Processors and Third Parties and Transfer to Third Countries

### *4.1 Cooperation with Processors and Third Parties*

Insofar as we disclose data to other persons and companies (order processors or third parties) in the course of our processing, transmit it to them or otherwise grant them access to the data, this shall only be done on the basis of a legal permission (e.g. if a transmission of the data to third parties, such as to payment service providers, is required for the performance of the contract pursuant to Art. 6 (1) lit. b DSGVO), you have consented, a legal obligation provides for this or on the basis of our legitimate interests (e.g. when using agents, web hosts, etc.).

If we commission third parties with the processing of data based on a so-called "order processing agreement", this is done in accordance with Art. 28 DSGVO.

### *4.2 Transfers to Third Countries*

If we process data in a third country (i.e. outside the European Union (EU) or the European Economic Area (EEA)) or if this is done in the context of using third-party services or disclosing or transferring data to third parties, this is only done if it is done to fulfill our (pre-)contractual obligations, on the basis of your consent, on the basis of a legal obligation or on the basis of our legitimate interests. Subject to legal or contractual permissions, we process or allow the processing of data in a third country only if the special requirements of Art. 44 et seq. DSGVO are met. I.e., the processing is carried out, for example, in compliance with officially recognized special contractual obligations (so-called "standard contractual clauses").

## 5. registration, order processing and use of our online services

### *5.1 Registration*

If you wish to use the services offered via our online offer, registration is required. The processed data includes the login information (name, password and an e-mail address).

If you set up an account for another person and/or thereby transmit data of this person to us for processing, we must assume that the respective person is informed about this and agrees to it.

This data is collected to confirm registration, to set up an account and to contact you. The data processing is based on Art. 6 para. 1 sentence 1 lit. b DSGVO, insofar as you are our direct contractual partner, or on Art. 6 para. 1 sentence 1 lit. f DSGVO, if you carry out the registration as an employee or authorized representative of such a direct contractual partner (legitimate interest of Planerio).

Users may be informed about information relevant to their user account, such as technical changes, by email. If users have terminated their user account, their data will be deleted, subject to a legal obligation to keep records. It is the responsibility of users to back up their data upon termination before the end of the contract. We are entitled to irretrievably delete all user data stored during the term of the contract.

Within the scope of the use of our registration and login functions as well as the use of the user account, we store the IP address and the time of the respective user action. The storage is based on our legitimate interests, as well as those of the users in protection against abuse and other unauthorized use. In principle, this data is not passed on to third parties, unless it is necessary for the pursuit of our claims or there is a legal obligation to do so in accordance with Art. 6 Para. 1 lit. c DSGVO. The IP addresses are anonymized or deleted after 7 days at the latest.

## *5.2 Order Processing*

We process the data of our customers during order transactions to enable them to select and order the selected products and services, as well as their payment and execution.

The processed data includes inventory data, communication data, contract data, payment data and the data subjects of the processing include our customers, prospective customers, and other business partners. The processing is carried out for the purpose of providing contractual services within the scope of our online offer.

The processing is based on Art. 6 para. 1 lit. b (execution of order transactions) and c (legally required archiving) DSGVO. In this context, the information marked as required is necessary for the justification and fulfillment of the contract. We disclose the data to third parties only in the context of delivery, payment or in the context of legal permissions and obligations to legal advisors and authorities. The data is only processed in third countries if this is necessary for the fulfillment of the contract (e.g. at the request of the customer for delivery or payment).

## *5.3 Use of our Online Offer*

### *5.3.1 Web Application*

If you use our online offer after registration - whether free of charge or for a fee - you can post data on the platform, share it with your company or other users, adjust it and communicate with other users.

If you transmit data of another person to us for processing when using our online offer, we must assume that the respective person is informed about this and agrees to it.

This data is collected and processed in order to offer and bill the services offered as part of our online offer, such as duty scheduling, time recording, payroll accounting, i.e. to fulfill Planerio's contractual obligations. The data processing is based on Art. 6 para. 1 sentence 1 lit. b DSGVO, insofar as you are our direct contractual partner, or on Art. 6 para. 1 sentence 1



lit. f DSGVO, if you carry out the registration as an employee or authorized representative of such a direct contractual partner (legitimate interest of Planerio).

### 5.3.2 Mobile App

Our app can also be obtained via special online platforms operated by other service providers (so-called "app stores"). In this context, the data protection notices of the respective app stores apply in addition to our data protection notices. This applies in particular about the methods used on the platforms for reach measurement and interest-based marketing as well as any obligation to pay costs.

Processed are inventory and roster data (e.g., names, addresses, shifts, absences); contact data (e.g., e-mail, telephone numbers); contract data (e.g., subject matter of contract, term, customer category); usage data (e.g., websites visited, interest in content, access times); meta/communication data (e.g., device information, IP addresses). Data subjects are customers and users. The purpose of the processing is to provide contractual services and customer service. The processing is based on the legal grounds of contract performance and pre-contractual requests (Art. 6 para. 1 p. 1 lit. b. DSGVO) and legitimate interests (Art. 6 para. 1 p. 1 lit. f. DSGVO).

### Apple App Store

App and software sales platform; service provider: Apple Inc, Infinite Loop, Cupertino, CA 95014, USA; Website: <https://www.apple.com/de/ios/app-store/>; Privacy policy: <https://www.apple.com/legal/privacy/de-ww/>.

### Google Play

App and software sales platform; service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain

View, CA 94043, USA; website: <https://play.google.com/store/apps?hl=de>; privacy policy: <https://policies.google.com/privacy>.

### 5.3.3 Special Notes on Applications (apps)

We process the data of the users of our application insofar as this is necessary to provide the application and its functionalities to the users, to monitor its security and to further develop it. We may also contact users in compliance with legal requirements, provided that the communication is necessary for purposes of administration or use of the application. In all other respects, we refer to the data protection information in this privacy policy regarding the processing of users' data.

The processing of data that is required for the provision of the functionalities of the application serves the fulfillment of contractual obligations. This also applies if the provision of the functionalities requires authorization of the users (e.g. releases of device functions). If the processing of data is not necessary for the provision of the functionalities of the application, but serves the security of the application or our business interests (e.g. collection of data for purposes of optimizing the application or security purposes), it is based on our legitimate interests. If users are explicitly asked for their consent to the processing of their data, the processing of the data covered by the consent is based on the consent.

Processed are inventory data (e.g. names, addresses), meta/communication data (e.g. device information, IP addresses), payment data (e.g. bank details, invoices, payment history), contract data (e.g. subject matter of the contract, term, customer category), location data (information on the geographical position of a device or a person).

Users (e.g. website visitors, users of online services) are affected by the processing. The processing is carried out for the purpose of providing contractual services and customer service and is based on consent (Art. 6 para. 1 p. 1 lit. a. DSGVO), contract performance and pre-contractual inquiries (Art. 6 para. 1 p. 1 lit. b. DSGVO), legitimate interests (Art. 6 para. 1 p. 1 lit. f. DSGVO).

#### [5.3.4 Further Information on Processing Processes, Procedures and Services](#)

##### **Commercial use**

We process the data of the users of our application, registered users and any test users (hereinafter each individually and collectively referred to as "users") in order to be able to provide our contractual services to them as well as on the basis of legitimate interests in order to ensure the security of our application and to be able to develop it further. The required information is identified as such in the context of the conclusion of the use, order, purchase order or comparable contract and may include the information required for the provision of services and for any billing, as well as contact information to be able to hold any consultations.

##### **Device authorizations for access to functions and data**

The use of our application or its functionalities may require user authorizations for access to certain functions of the devices used or to the data stored on the devices or accessible by means of the devices. By default, these permissions must be granted by users and can be revoked at any time in the settings of the respective devices. The exact procedure for controlling app permissions may depend on the users' device and software. If clarification is needed, users can contact us. We would like to point out that denial or revocation of the respective permissions may affect the functionality of our app.

##### **Processing of stored contacts**

As part of the use of our application, the contact information of individuals (name, e-mail address, phone number) stored in the contact directory of the device is processed. The use of the contact information requires user authorization, which can be revoked at any time. The

use of the contact information serves in each case only to provide the respective functionality of our application, according to its description to the users, or its typical and expected functionality. Users are advised that permission to process the contact information must be permitted and, in the case of natural persons, requires their consent or legal permission.

### **Processing of location data**

As part of the use of our application, location data collected from the device used or otherwise entered by users is processed. The use of location data requires user authorization, which can be revoked at any time. In each case, the use of the location data serves only to provide the respective functionality of our application, according to its description to the users, or its typical and expected functionality.

### *5.4 Function-dependent Interfaces*

Depending on the functions selected by the contractual partner, data exchange takes place with one or more of the companies listed below to be able to provide and continuously improve our services; the legal basis for processing the data is Art. 6 (1) sentence 1 lit. b) DSGVO. If the third party providers mentioned in section 5.4. act for us as commissioned data processors, the commissioned data processing is carried out in accordance with Art. 28 DSGVO. We have selected these third-party providers carefully and in accordance with the provisions of the DSGVO.

#### **Doctolib**

Online appointment scheduling and appointment management; service provider: Doctolib GmbH, Wilhelmstraße 118, Aufgang C, 10963 Berlin, Germany, parent company: Doctolib SAS, 32 rue de Monceau 75008 Paris, France; website: <https://www.doctolib.de>; privacy policy: <https://www.doctolib.de/terms/agreement>.

#### **Personio**

Human resources management and recruiting platform and services; service provider: Personio GmbH, Rundfunkplatz 4, 80335 Munich, Germany; website: <https://personio.de/>; privacy policy: <https://www.personio.de/datenschutzerklaerung/>.

#### **SAP**

Integrated standard business software product with functions in the area of human resources management and payroll; service provider: SAP Deutschland SE & Co. KG, Hasso-Plattner-Ring 7, 69190 Walldorf, Germany; website: <https://www.sap.com/>; privacy policy: <https://www.sap.com/germany/about/legal/privacy.html>.

### *5.5 Video Conferencing, Online Meetings, Webinars and Screen Sharing.*

We use platforms and applications of other providers (hereinafter referred to as "conferencing platforms") for the purpose of conducting video and audio conferences, webinars and other types of video and audio meetings (hereinafter collectively referred to as

"conference"). When selecting the conference platforms and their services, we observe the legal requirements.

During participation in a conference, the conference platforms process the personal data of the participants mentioned below. The scope of the processing depends on the one hand, on which data is requested in the context of a specific conference (e.g., provision of access data or clear names) and which optional information is provided by the participants. In addition to processing for the purpose of conducting the conference, participants' data may also be processed by the conference platforms for security purposes or service optimization. The processed data includes personal data (first name, last name), contact information (e-mail address, telephone number), access data (access codes or passwords), profile pictures, information on professional position/function, the IP address of the Internet access, information on the participants' terminal devices, their operating system, the browser and its technical and language settings, information on the content of communications, i.e. entries in chats and audio and video data, as well as the use of other available functions (e.g. surveys). Content of communications is encrypted to the extent technically provided by the conference providers. If participants are registered as users with the conference platforms, then further data may be processed in accordance with the agreement with the respective conference provider.

If text entries, participation results (e.g. from surveys) and video or audio recordings are logged, this will be transparently communicated to the participants in advance and they will be asked for consent - where necessary.

Please note the details of the processing of your data by the conference platforms in their data protection notices and select the optimal security and data protection settings for you within the framework of the conference platforms' settings. Furthermore, please ensure data and privacy protection in the background of your recording for the duration of a videoconference (e.g., by notifying roommates, locking doors, and using the background masking function, if technically possible). Links to the conference rooms as well as access data, may not be disclosed to unauthorized third parties.

If, in addition to the conference platforms, we also process users' data and ask users for their consent to use the conference platforms or certain functions (e.g. consent to a recording of conferences), the legal basis of the processing is this consent. Furthermore, our processing may be necessary for the fulfillment of our contractual obligations (e.g., in participant lists, in the case of reprocessing of call results).

### **Microsoft Teams**

Messenger and conferencing software; service provider: Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland, parent company: Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399 USA; website: <https://products.office.com>; privacy policy: <https://privacy.microsoft.com/de-de/privacystatement>, security notices: <https://www.microsoft.com/de-de/trustcenter>; standard contractual clauses (ensuring level of data protection for processing in third

countries): <https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA>.

### *5.6 Chatbots and Chat Functions*

We offer online chats and chatbot functions (collectively referred to as "chat services") as a communication option. A chat is an online conversation conducted with some degree of timeliness. A chatbot is software that answers users' questions or notifies them of messages. When you use our chat features, we may process your personal data.

If you use our chat services within an online platform, your identification number will also be stored within the respective platform. We may also collect information about which users interact with our chat services and when. Furthermore, we store the content of your conversations via the chat services and log registration and consent processes to be able to prove these in accordance with legal requirements.

We point out to users that the respective platform provider may learn that and when users communicate with our chat services as well as collect technical information about the device used by users and, depending on the settings of their device, also location information (so-called metadata) for purposes of optimizing the respective services and for security purposes. Likewise, the metadata of communication via chat services (i.e., e.g., information about who communicated with whom) may be used by the respective platform providers in accordance with their terms and conditions, to which we refer for further information, for marketing purposes or to display advertising tailored to users.

If users agree to a chatbot to activate information with regular messages, they have the option to unsubscribe from the information for the future at any time. The chatbot instructs users how and with which terms they can unsubscribe from the messages. By unsubscribing from the chatbot messages, users' data is deleted from the list of message recipients.

We use the aforementioned information to operate our chat services, e.g., to personally address users, to respond to their inquiries, to deliver any requested content, and to improve our chat services (e.g., to "teach" chatbots answers to frequently asked questions or to identify unanswered inquiries).

We use chat services based on consent where we have obtained prior permission from users to process their data as part of our chat services (this applies to cases where users are asked for consent, for example, for a chatbot to send them messages on a regular basis). If we use chat services to answer users' inquiries about our services or our company, this is done for contractual and pre-contractual communications, Meta/communication data (e.g. device information, IP addresses). Our communication partners are affected. The purpose of the processing is to respond to contact requests and communication, direct marketing (e.g. by email or postal mail). The processing is based on the legal grounds consent (Art. 6 para. 1 p. 1 lit. a. DSGVO), contract performance and pre-contractual requests (Art. 6 para. 1 p. 1 lit. b. DSGVO), legitimate interests (Art. 6 para. 1 p. 1 lit. f. DSGVO).

## Pipedrive

We use the CRM system Pipedrive (<https://www.pipedrive.com/de>) of the provider Pipedrive OÜ on the basis of our legitimate interests according to Art. 6 para. 1 sentence 1 lit. f) DSGVO (efficient and fast processing of user inquiries, existing customer management, new customer business), a private limited company established under the laws of the Republic of Estonia, with the address Paldiski mnt 80, Tallinn, 10617, Estonia, registered in the Estonian Commercial Register under the code 11958539, and a subsidiary of Pipedrive US. Pipedrive's privacy policy can be accessed here: <https://www.pipedrive.com/en/privacy>.

### *5.7 Push Notifications*

With the consent of users, we may send users so-called "push notifications". These are messages that are displayed on users' screens, devices, or browsers, even if our online service is not being actively used at the time.

To sign up for the push messages, users must confirm their browser or terminal device's request to receive the push messages. This consent process is documented and stored. The storage is necessary to recognize whether users have agreed to receive the push messages as well as to be able to prove the consent. For these purposes, a pseudonymous identifier of the browser (so-called "push token") or the device ID of an end device is stored.

On the one hand, the push messages may be necessary for the fulfillment of contractual obligations (e.g., technical, and organizational information relevant to the use of our online offer) and are otherwise sent on the basis of user consent, unless specifically mentioned below. Users can change the receipt of push messages at any time using the notification settings of their respective browsers, or end devices.

Usage data (e.g. websites visited, interest in content, access times) is processed. The processing is carried out for the provision of contractual services and customer service, coverage measurement (e.g. access statistics, recognition of returning visitors) and is based on consent (Art. 6 para. 1 p. 1 lit. a) DSGVO), contract performance and pre-contractual requests (Art. 6 para. 1 p. 1 lit. b) DSGVO).

We evaluate push messages statistically and can thus recognize whether and when push messages were displayed and clicked on. This information is used to technically improve our push messages based on the technical data or target groups and their retrieval behavior or retrieval times. This analysis also includes determining whether push messages are opened, when they are opened, and whether users interact with their content or buttons. While this information can be attributed to individual push message recipients for technical reasons. However, it is neither our intention nor, if used, that of the push message service provider to observe individual users. Rather, the evaluations serve us to recognize the usage habits of our users and to adapt our push messages to them or to send different push messages according to the interests of our users. The evaluation of the push messages and the measurement of success are carried out based on the express consent of the users, which is done with the consent to receive the push messages. Users can object to the analysis and performance

measurement by unsubscribing from the push messages. Unfortunately, a separate revocation of the analysis and performance measurement is not possible.

## **OneSignal**

Sending and managing push notifications; service provider: OneSignal, Inc, 2850 S Delaware St Suite 201, San Mateo, CA 94403, USA; Website: <https://onesignal.com>; Privacy policy: [https://onesignal.com/privacy\\_policy](https://onesignal.com/privacy_policy); Standard contractual clauses (ensuring level of data protection in case of processing in third countries): are concluded with the provider.

### *5.8 Guided Tours/Guides, User Profiles, User Feedback and Communication*

We use Pendo to provide guided tours/guides, to create user profiles for the needs-based design of the software, to collect user feedback and to communicate with users. The data processing is based on our legitimate interests according to Art. 6 (1) lit. f DSGVO, with the right to object in third-party providers. The service provider is Pendo Inc, 418 South Dawson St, Raleigh, NC 27601, USA. Purposes/Purposeful Interests: Conducting guided tours/guides through the software during the implementation phase of the software and in customer service, aggregated analysis of usage behavior within the software, collection of customer feedback e.g. in the context of NPS (Net Promoter Scores) for further development of the product, in-app communication to users about e.g. new releases; Data(categories): Inventory data (e.g., customer ID, user ID, user role, language), content data (e.g., text input), contract data (e.g., subject matter of contract), usage and metadata (e.g., in the context of evaluating usage rates or measuring success), progress status in the tour/guide (also in the context of cookies); Data subjects: all users; Suitable or appropriate safeguards: EU standard contractual clauses; Further information: <https://www.pendo.io/privacypolicy/>.

### *5.9 Processing of Location Data*

As part of the use of our application, the location data collected from the device used or otherwise entered by the users are processed. The use of the location data requires the consent of the users, which can be revoked at any time. The use of the location data serves in each case only to provide the respective functionality of our application, according to its description to the users, or its typical and expected functionality.

### *5.10. Service and Consulting Services*

We process our customers' data as part of our contractual services which include software implementation, conceptual and strategic consulting, software and design development/consulting or maintenance, implementation of campaigns and processes/handling, server administration, data analysis/consulting services and training services.

In this context, we process inventory data (e.g., customer master data, such as names or addresses), contact data (e.g., e-mail, telephone numbers), content data (e.g., text entries), contract data (e.g., subject matter of the contract, term), payment data (e.g., bank details,

payment history), usage data and metadata (e.g., in the context of evaluating usage rates or measuring success). As a matter of principle, we do not process special categories of personal data, unless these are components of commissioned processing. Data subjects include our customers, prospective customers, as well as their customers, users, website visitors or employees, and third parties.

The purpose of the processing is the provision of contractual services, billing, and our customer service. The legal basis for the processing results from Art. 6 para. 1 lit. b DSGVO (contractual services), Art. 6 para. 1 lit. f DSGVO (analysis, statistics, optimization, security measures). We process data that is necessary for the justification and fulfillment of contractual services and point out the necessity of their indication. Disclosure to external parties only takes place if it is necessary in the context of an order. When processing the data provided to us as part of an order, we act in accordance with the instructions of the client as well as the legal requirements of a contract processing pursuant to Art. 28 DSGVO and do not process the data for any other purposes than those specified in the order.

We delete the data after the expiry of legal warranty and comparable obligations. The necessity of keeping the data is reviewed every three years; in the case of legal archiving obligations, the deletion takes place after their expiry (6 years, according to § 257 para. 1 HGB, 10 years, according to § 147 para. 1 AO). In the case of data disclosed to us by the client as part of an order, we delete the data in accordance with the specifications of the order, generally after the end of the order.

## *5.11. Administration, Financial Accounting, Organization, Contact Management*

### *5.11.1 General*

We process data within the scope of administrative tasks as well as organization of our operations, financial accounting, compliance with legal obligations, such as archiving, for purposes of organization, administration, planning as well as provision of our services. In doing so, we use services, platforms, and software of other providers (hereinafter referred to as "Third-Party Providers"). When selecting the third-party providers and their services, we observe the legal requirements.

In general, we process the same data that we process while providing our (pre-)contractual services. If we ask users for their consent to use the third-party providers, the legal basis for processing data is consent. Furthermore, their use may be a component of our (pre-)contractual services, provided that the use of the third-party providers has been agreed within this framework. Otherwise, user data is processed on the basis of our legitimate interests (i.e. interest in efficient, economical and recipient-friendly services). In this context, we would also like to refer you to the information on the use of cookies in this privacy policy.

Customers, interested parties, business partners and website visitors are affected by the processing. The purpose and our interest in the processing lie in the administration, financial accounting, office organization, archiving of data, i.e. tasks that serve to maintain our business activities, perform our tasks and provide our services. The deletion of data regarding



contractual services and contractual communication corresponds to the information mentioned in these processing activities.

In this context, personal data may be processed and stored on the servers of third-party providers. This may involve various data that we process in accordance with this privacy policy. This data may include master data and contact data of users, data on transactions, contracts, other processes and their contents.

If users are referred to the third-party providers or their software or platforms in the course of communication, business or other relationships with us, the third-party providers may process usage data and metadata for security purposes, service optimization or marketing purposes. We therefore ask you to observe the data protection notices of the respective third-party providers.

In this context, we disclose or transmit data to the tax authorities, consultants such as tax advisors or auditors, as well as other fee offices and payment service providers.

Furthermore, we store information on suppliers, organizers and other business partners on the basis of our business interests, e.g. for the purpose of contacting them at a later date. This data, most of which is company-related, is generally stored permanently.

#### 5.11.2 Further Notes on Processing Procedures, Methods and Services

##### **Billomat**

For the completion of accounting, we use the cloud-based accounting software of Billomat GmbH & Co. KG, Lorenzer Str. 31, 90402 Nuremberg, Germany ("Billomat"). Billomat processes incoming and outgoing invoices and, if applicable, also the bank transactions of our company in order to automatically record invoices, match them to the transactions and create the financial accounting from this in a semi-automated process. If personal data is also processed in this process, the processing is carried out in accordance with Art. 6 (1) f DSGVO on the basis of our legitimate interest in the efficient organization and documentation of our business transactions. For more information about Billomat, the automated processing of data and data protection regulations, please visit <https://www.billomat.com/datenschutz/>.

##### **Calendly**

Online appointment scheduling and appointment management; service provider: Calendly LLC., 271 17th St NW, Ste 1000, Atlanta, Georgia, 30363, USA; website: <https://calendly.com/de>; privacy policy: <https://calendly.com/pages/privacy>; order processing contract: <https://calendly.com/dpa>; standard contractual clauses (ensuring level of data protection for processing in third countries): <https://calendly.com/dpa>.

##### **Confluence**

Software for creating and administering wiki & knowledge platforms; service provider: Atlassian Inc. (San Francisco, Harrison Street Location), 1098 Harrison Street, San Francisco, California 94103, USA; website: <https://www.atlassian.com/software/confluence>; privacy policy: <https://www.atlassian.com/legal/privacy-policy>; standard contractual clauses

(ensuring level of data protection for processing in third countries): Part of the order processing contract; Further information: Data Transfer Impact Assessment: <https://www.atlassian.com/legal/data-transfer-impact-assessment>.

### **Docubizz**

Accounting, banking, and tax filing software with document storage; service provider: DocuBizz ApS., Hørskædden 18, DK-2630 Taastrup, Denmark; Website: <https://www.docubizz.de/>; Privacy policy: <https://www.docubizz.de/> under the imprint section.

### **DocuSign**

Digital signatures and signing procedures for documents; service provider: DocuSign, Inc, 221 Main Street Suite 1000 San Francisco, CA 94105, USA; Website: <https://www.docusign.com/>; Privacy policy: <https://www.docusign.com/company/privacy-policy>; Further information: Processing as processor and controller is based on approved binding internal data protection rules that ensure a level of data protection that complies with the requirements of the GDPR (English: "Binding Corporate Rules", Art. 47 GDPR): <https://www.docusign.com/trust/privacy/binding-corporate-rules>.

### **Jira**

Web application for bug management, troubleshooting and operational project management; Service provider: Atlassian Inc (San Francisco, Harrison Street Location), 1098 Harrison Street, San Francisco, California 94103, USA; Website: <https://www.atlassian.com/software/jira>; Privacy policy: <https://www.atlassian.com/legal/privacy-policy>; Order processing contract: <https://www.atlassian.com/legal/data-processing-addendum>; Standard contractual clauses (ensuring level of data protection for processing in third countries): Inclusion in the order processing contract; Further information: Data Transfer Impact Assessment: <https://www.atlassian.com/legal/data-transfer-impact-assessment>.

### **monday.com.**

Project management - organizing and managing teams, groups, workflows, projects and processes; Service provider: monday.com Ltd, 6 Yitzhak Sadeh Street, Tel Aviv 6777506, Israel; Website: <https://monday.com/lang/de/>; Privacy policy: <https://monday.com/l/de/privatsphaere/datenschutzerklarung/>; Order processing contract: <https://monday.com/l/de/privatsphaere/dpa/>; Standard contractual clauses (ensuring data protection level for processing in third countries): <https://monday.com/l/de/privatsphaere/standardvertragsbedingungen-fuer-kunden-scc-datenverantwortlicher-zu-datenverarbeiter/> (data controller to data processor), <https://monday.com/l/de/privatsphaere/standardvertragsbedingungen-fuer-kunden-scc-datenverarbeiter-zu-datenverarbeiter/> (data processor to data processor).

### **PandaDoc**

Digital signatures and document signing process; service provider: PandaDoc, Inc, 3739 Balboa St. #1083, San Francisco, CA 94121, USA; Website: <https://www.pandadoc.com/de/>;

Privacy policy: <https://www.pandadoc.com/de/privacy-notice/>; Further information: <https://www.pandadoc.com/gdpr/>.

### **Pipedrive**

We use the CRM system Pipedrive of the provider Pipedrive OÜ on the basis of our legitimate interests (efficient and fast processing of user requests, existing customer management, new customer business), a private limited company established under the laws of the Republic of Estonia, with the address Paldiski mnt 80, Tallinn, 10617, Estonia, registered in the Estonian Commercial Register under the code 11958539, and a subsidiary of Pipedrive US. Pipedrive's privacy policy is available here: <https://www.pipedrive.com/en/privacy>. Order processing agreement: <https://www.pipedrive.com/en/privacy#data-controller-and-data-processor>

### **Salesforce**

We use the CRM system Salesforce of the provider salesforce.com Germany GmbH (<https://www.salesforce.com/de/>), Erika-Mann-Str. 31, 80636 Munich, Germany on the basis of our legitimate interests (efficient and fast processing of user inquiries, existing customer management, new customer business), a subsidiary of Salesforce, Inc. You can access the privacy policy of Salesforce here: <https://www.salesforce.com/de/company/privacy/>.

### **sevDesk**

Online software for invoicing, accounting, banking and tax filing with document storage; Service provider: sevDesk GmbH, Hauptstraße 115, 77652 Offenburg, Germany; Website: <https://sevdesk.de/>; Privacy policy: <https://sevdesk.de/sicherheit-datenschutz/>; Order processing contract: <https://sevdesk.de/sicherheit-datenschutz/>.

## *5.12. Plugins and Embedded Functions and Content*

### *5.12.1 General Information on Plugins and Embedded Functions and Content*

We integrate functional and content elements into our online offer that are obtained from the servers of their respective providers (hereinafter referred to as "third-party providers"). These can be, for example, graphics, videos or city maps (hereinafter collectively referred to as "content").

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

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

Usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses), inventory data (e.g. names, addresses), contact data (e.g. e-mail, telephone numbers), content data (e.g. entries in online forms) are processed. Data subjects of the data processing are users (e.g. website visitors, users of online services). The processing takes place for the purpose of providing our online offer and user friendliness, provision of contractual services and customer service, profiles with user-related information (creation of user profiles) and is based on consent (Art. 6 para. 1 p. 1 lit. a. DSGVO), contract performance and pre-contractual requests (Art. 6 para. 1 p. 1 lit. b. DSGVO), legitimate interests (Art. 6 para. 1 p. 1 lit. f. DSGVO).

#### 5.12.2 Further Notes on Processing Procedures, Methods and Services

##### **Integration of third-party software, scripts or frameworks (e.g. jQuery).**

We integrate software into our online offer that we retrieve from servers of other providers (e.g., function libraries that we use for the purpose of display or user-friendliness of our online offer). In doing so, the respective providers collect the IP address of the user and may process this for the purpose of transmitting the software to the user's browser and for security purposes, as well as for the evaluation and optimization of their offer. - We integrate software into our online offer that we retrieve from servers of other providers (e.g. function libraries that we use for the purpose of display or user-friendliness of our online offer). In doing so, the respective providers collect the IP address of the user and may process this for the purpose of transmitting the software to the user's browser and for security purposes, as well as for the evaluation and optimization of their offer.

##### **Google Fonts**

Purchase of fonts ("Google Fonts") from the provider Google for the purpose of a technically secure, maintenance-free, and efficient use of fonts in terms of timeliness and loading times, deren einheitliche Darstellung und Berücksichtigung möglicher lizenzrechtlicher Beschränkungen. Google wird die IP-Adresse des Nutzers mitgeteilt, damit Google die Schriften im Browser der Nutzer bereitstellen kann. Darüber hinaus werden technische Daten (Spracheinstellungen, Bildschirmauflösung, Betriebssystem, verwendete Hardware) übermittelt, die für die Bereitstellung der Schriftarten in Abhängigkeit von den verwendeten Geräten und der technischen Umgebung erforderlich sind. ; Dienstanbieter: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Irland, Mutterunternehmen: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: <https://fonts.google.com/>; Datenschutzerklärung: <https://policies.google.com/privacy>.

## Google Maps

Wir binden die Landkarten des Dienstes "Google Maps" des Anbieters Google ein. Zu den verarbeiteten Daten können insbesondere IP-Adressen und Standortdaten der Nutzer gehören, die jedoch nicht ohne deren Einwilligung (im Regelfall im Rahmen der Einstellungen ihrer Mobilgeräte vollzogen), erhoben werden; Dienstanbieter: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Irland, Mutterunternehmen: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: <https://cloud.google.com/maps-platform>; Datenschutzerklärung: <https://policies.google.com/privacy>; Widerspruchsmöglichkeit (Opt-Out): Opt-Out-Plugin: <https://tools.google.com/dlpage/gaoptout?hl=de>, Einstellungen für die Darstellung von Werbeeinblendungen: <https://adssettings.google.com/authenticated>.

## Vimeo

Videoinhalte; Dienstanbieter: Vimeo Inc., Attention: Legal Department, 555 West 18th Street New York, New York 10011, USA; Website: <https://vimeo.com>; Datenschutzerklärung: <https://vimeo.com/privacy>; Widerspruchsmöglichkeit (Opt-Out): Wir weisen darauf hin, dass Vimeo Google Analytics einsetzen kann und verweisen hierzu auf die Datenschutzerklärung (<https://policies.google.com/privacy>) sowie die Opt-Out-Möglichkeiten für Google-Analytics (<https://tools.google.com/dlpage/gaoptout?hl=de>) oder die Einstellungen von Google für die Datennutzung zu Marketingzwecken (<https://adssettings.google.com/>).

## YouTube-Videos

Videoinhalte; Dienstanbieter: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Irland, Mutterunternehmen: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: <https://www.youtube.com>; Datenschutzerklärung: <https://policies.google.com/privacy>; Widerspruchsmöglichkeit (Opt-Out): Opt-Out-Plugin: <https://tools.google.com/dlpage/gaoptout?hl=de>, Einstellungen für die Darstellung von Werbeeinblendungen: <https://adssettings.google.com/authenticated>.

### *5.13. Business Analyses and Market Research*

In order to run our business economically, to be able to recognize market trends, wishes of contractual partners and users, we analyze the data we have on business transactions, contracts, inquiries, etc.. In doing so, we process inventory data, communication data, contract data, payment data, usage data, metadata based on Art. 6 para. 1 lit. f. DSGVO, whereby the data subjects include contractual partners, interested parties, customers, visitors, and users of our online offer.

The analyses are carried out for the purpose of business evaluations, marketing, and market research. In doing so, we may take into account the profiles of registered users with details, for example, of the services they have used. The analyses serve us to increase the user-friendliness, the optimization of our offer and the business management. The analyses serve us alone and are not disclosed externally unless they are anonymous analyses with aggregated values.

#### *5.14. Surveys and Polls*

The surveys and polls we conduct (hereinafter "surveys") are evaluated anonymously. Personal data is only processed insofar as this is necessary for the provision and technical implementation of the surveys (e.g. processing of the IP address in order to display the survey in the user's browser or to enable the survey to be resumed with the aid of a temporary cookie (session cookie)) or users have given their consent.

If we ask participants for consent to process their data, this (Art. 6 para. 1 p. 1 lit. a. DSGVO) is the legal basis for the processing, otherwise the processing of participants' data is based on our legitimate interests (Art. 6 para. 1 p. 1 lit. f. DSGVO) in conducting an objective survey.

Contact data (e.g. e-mail, telephone numbers), content data (e.g. entries in online forms), usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses) are processed.

All of our communication partners who participate in the survey/survey are affected. The purpose of the processing is contact requests and communication, direct marketing (e.g. by e-mail or postal mail).

## **6. Applicants and Application Procedure**

### *6.1 Data Protection Information in the Application Procedure*

We process applicant data only for the purpose of and within the scope of the application procedure in accordance with legal requirements. Applicant data is processed to fulfill our (pre-)contractual obligations within the scope of the application procedure in accordance with Art. 6 para. 1 lit. b. DSGVO Art. 6 para. 1 lit. f. DSGVO insofar as the data processing becomes necessary for us, e.g. in the context of legal procedures (in Germany, Section 26 BDSG also applies).

The application procedure requires applicants to provide us with applicant data. The necessary applicant data are marked, if we offer an online form, otherwise result from the job descriptions and basically include the personal details, postal and contact addresses and the documents belonging to the application, such as cover letter, resume and the certificates. In addition, applicants may voluntarily provide us with additional information.

By submitting their application to us, applicants consent to the processing of their data for the purposes of the application process in the manner and to the extent set out in this privacy policy.

Insofar as special categories of personal data within the meaning of Art. 9 (1) DSGVO are voluntarily communicated within the scope of the application procedure, their processing is additionally carried out in accordance with Art. 9 (2) lit. b DSGVO (e.g. health data, such as severely disabled status or ethnic origin). Insofar as special categories of personal data within the meaning of Art. 9 (1) DSGVO are requested from applicants as part of the application process, their processing is additionally carried out in accordance with Art. 9 (2) a DSGVO (e.g. health data, if this is necessary for the exercise of the profession).

If provided, applicants can submit their applications to us using an online form on our website. The data is processed according to the state of the art transmitted to us in encrypted form. Applicants can also send us their applications by e-mail. However, please note that e-mails are generally not encrypted, and applicants must ensure encryption themselves. We cannot therefore accept any responsibility for the transmission path of the application between the sender and receipt on our server and therefore recommend rather using an online form or sending by post. This is because instead of applying via the online form and e-mail, applicants still have the option of sending us their application by post.

In the event of a successful application, the data provided by the applicants may be processed by us for the purposes of the employment relationship. Otherwise, if the application for a job offer is not successful, the applicants' data will be deleted. Applicants' data will also be deleted if an application is withdrawn, which applicants are entitled to do at any time.

Subject to a justified withdrawal by the applicants, the deletion will take place after the expiry of a period of six months so that we can answer any follow-up questions about the application and meet our obligations to provide evidence under the Equal Treatment Act. Invoices for any reimbursement of travel expenses will be archived in accordance with tax law requirements.

#### *6.2 Talent Pool*

As part of the application process, we offer applicants the opportunity to be included in our "talent pool" for a period of two years on the basis of consent within the meaning of Art. 6 Para. 1 lit. b. and Art. 7 DSGVO.

The application documents in the talent pool will be processed solely in the context of future job advertisements and employee searches and will be destroyed at the latest after the expiry of the aforementioned period. Applicants are informed that their consent to inclusion in the talent pool is voluntary, has no influence on the current application process and that they can revoke this consent at any time for the future and declare their objection within the meaning of Art. 21 DSGVO.

#### *6.3 Further Information on Processing, Procedures and Services*

##### **Stepstone**

Recruiting platform and services; Service provider: StepStone Deutschland GmbH, Völklinger Straße 1, 40219 Düsseldorf, Germany; Website: <https://www.stepstone.de>; Privacy Policy: <https://www.stepstone.de/Ueber-StepStone/Rechtliche-Hinweise/datenschutzerklaerung/>.

##### **Indeed**

Recruiting platform and services; service provider: Indeed Ireland Operations Limited, 124 St. Stephen's Green, Dublin 2, Ireland; website: <https://indeed.com/>; privacy policy: <https://de.indeed.com/legal?hl=de#privacypolicy>.

## JOIN

Recruiting platform and services; service provider: JOIN Solutions GmbH, Schönhauser Allee 36, 10435 Berlin, Germany; website: <https://join.com/de/>; privacy policy: <https://join.com/de/datenschutz/>.

## Personio

Personnel management and recruiting platform and services; Service provider: Personio GmbH, Rundfunkplatz 4, 80335 Munich, Germany; website: <https://personio.de/>; privacy policy: <https://www.personio.de/datenschutzerklaerung/>.

## 7. Hosting

### *7.1 General Information about Hosting*

The hosting services used by us serve to provide the following services: Infrastructure and platform services, computing capacity, storage space and database services, security services and technical maintenance services, which we use for the purpose of operating this online offer.

In this context, we, or our hosting provider, process inventory data, contact data, content data, contract data, usage data, meta data and communication data of customers, interested parties and visitors of this online offer on the basis of our legitimate interests in an efficient and secure provision of this online offer pursuant to Art. 6 para. 1 lit. f DSGVO in conjunction with Art. 28 DSGVO. Art. 28 DSGVO (conclusion of order processing contract).

### *7.2 Collection of Access Data and Log Files*

We, or our hosting provider, collect on the basis of our legitimate interests within the meaning of Art. 6 para. 1 lit. f. DSGVO, we collect data about each access to the server on which this service is located (so-called server log files). The access data includes the name of the website accessed, file, date and time of access, amount of data transferred, notification of successful access, browser type and version, the user's operating system, referrer URL (the previously visited page), IP address and the requesting provider.

Log file information is stored for security reasons (e.g. for the clarification of abuse or fraud) for a maximum of 7 days and then deleted. Data whose further storage is required for evidentiary purposes is excluded from deletion until the final clarification of the respective incident.

### *7.3 Further Information on Processing Processes, Procedures and Services*

#### **Amazon Web Services (AWS)**

Services in the field of providing information technology infrastructure and related services (e.g., storage space and/or computing capacity); Service provider: Amazon Web Services, Inc., 410 Terry Avenue North, Seattle WA 98109, USA; website: <https://aws.amazon.com/de/>;



Datenschutzerklärung: [https://aws.amazon.com/de/privacy/?nc1=f\\_pr](https://aws.amazon.com/de/privacy/?nc1=f_pr);  
Auftragsverarbeitungsvertrag: [https://d1.awsstatic.com/legal/aws-gdpr/AWS\\_GDPR\\_DPA.pdf](https://d1.awsstatic.com/legal/aws-gdpr/AWS_GDPR_DPA.pdf);  
Standardvertragsklauseln (guaranteeing level of data protection for processing in third countries): <https://aws.amazon.com/de/service-terms/>.

## Hetzner

Services in the field of providing information technology infrastructure and related services (e.g., storage space and/or computing capacity); service provider: Hetzner Online GmbH, Industriestr. 25, 91710 Gunzenhausen, Germany; website: <https://www.hetzner.com>; privacy policy: <https://www.hetzner.com/de/rechtliches/datenschutz>; Order processing contract: <https://docs.hetzner.com/de/general/general-terms-and-conditions/data-privacy-faq/>.

## Microsoft Cloud Services

Cloud storage, cloud infrastructure services and cloud-based application software; service provider: Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland; parent company: Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399 USA; website: <https://microsoft.com/de-de>; privacy policy: <https://privacy.microsoft.com/de-de/privacystatement>, security notices: <https://www.microsoft.com/de-de/trustcenter>; order processing contract: <https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA>; standard contractual clauses (ensuring level of data protection in case of processing in third countries): <https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA>.

## 8. blog, Comments and Contributions

### *8.1 Comments and Contributions*

When users leave comments or other contributions, their IP addresses may be stored for 7 days based on our legitimate interests as defined in Art. 6 para. 1 lit. f. DSGVO are stored for 7 days. This is done for our security in case someone leaves unlawful content in comments and posts (insults, prohibited political propaganda, etc.). In this case, we ourselves can be prosecuted for the comment or post and are therefore interested in the identity of the author.

Furthermore, we reserve the right, on the basis of our legitimate interests pursuant to Art. 6 para. 1 lit. f) DSGVO, to process the information provided by users for the purpose of spam detection.

The data provided in the context of comments and contributions will be permanently stored by us until the objection of the user.

## *8.2 Retrieval of Emojis and Smilies*

Within our WordPress blog, graphical emojis (or smilies), i.e. small graphic files expressing emotions, can be used, which are obtained from external servers. In doing so, the providers of the servers, collect the IP addresses of the users. This is necessary so that the emoji files can be transmitted to the users' browsers. The emoji service is provided by Automattic Inc, 60 29th Street #343, San Francisco, CA 94110, USA. Privacy policy of Automattic: <https://automattic.com/privacy/>. The server domains used are s.w.org and twemoji.maxcdn.com. As far as we know, these are so-called content delivery networks, i.e. servers that only serve to transmit the files quickly and securely, and the users' personal data is deleted after transmission.

## **9. Contacting and Customer Relations Management (CRM)**

### *9.1 General Information on Contacting Us and CRM*

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

The answering of contact inquiries as well as the administration of contact and inquiry data in the context of contractual or pre-contractual relationships is carried out to fulfill our contractual obligations or to answer (pre)contractual inquiries and otherwise based on legitimate interests in answering inquiries and maintaining user or business relationships.

Processed are inventory data (e.g. names, addresses); contact data (e.g. e-mail, telephone numbers); content data (e.g. entries in online forms). All our communication partners who use these channels are affected. The purpose of the processing is to respond to contact requests and communication, the provision of contractual services and customer service.

The processing is based on the legal grounds of contract performance and pre-contractual inquiries (Art. 6 para. 1 p. 1 lit. b. DSGVO), legitimate interests (Art. 6 para. 1 p. 1 lit. f. DSGVO), legal obligation (Art. 6 para. 1 p. 1 lit. c. DSGVO).

### *9.2 Further Information on Processing Processes, Procedures and Services*

#### **Contact Form**

If users contact us via our contact form, e-mail, or other communication channels, we process the data communicated to us in this context to process the communicated request. For this purpose, we process personal data in the context of pre-contractual and contractual business relationships, insofar as this is necessary for their fulfillment, and otherwise based on our legitimate interests as well as the interests of the communication partners in responding to the concerns and our statutory retention obligations.

## reCAPTCHA

We integrate the "reCAPTCHA" function to be able to recognize whether entries (e.g. in online forms) are made by humans and not by automatically acting machines (so-called "bots"). The processed data may include IP addresses, information on operating systems, devices or browsers used, language settings, location, mouse movements, keyboard strokes, time spent on websites, previously visited websites, interactions with ReCaptcha on other websites, possibly cookies as well as results of manual recognition processes (e.g. answering questions asked or selecting objects in images). The data processing is carried out on the basis of our legitimate interest in protecting our online offering from abusive automated crawling and spam; service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; website: <https://www.google.com/recaptcha/>; privacy policy: <https://policies.google.com/privacy>; opt-out: Opt-Out-Plugin: <https://tools.google.com/dlpage/gaoptout?hl=de>, Settings for the display of advertisements: <https://adssettings.google.com/authenticated>.

## Zendesk

We use the CRM system "Zendesk", of the provider Zendesk, Inc., 989 Market Street #300, San Francisco, CA 94102, USA, to be able to process user inquiries more quickly and efficiently (legitimate interest pursuant to Art. 6 (1) lit. f. DSGVO).

Zendesk uses the users' data only for the technical processing of the requests and does not pass them on to third parties. For the use of Zendesk, at least the specification of a correct e-mail address is necessary. A pseudonymous use is possible. In the course of processing service requests, it may be necessary to collect further data (e.g. name, address, phone number). The use of Zendesk is optional and serves to improve and accelerate our customer and user service.

If users do not agree to data collection via and data storage in Zendesk's external system, we provide them with alternative contact options for submitting service requests by email, phone, fax, or mail.

Website: <https://www.zendesk.de>; Privacy policy: <https://www.zendesk.de/company/customers-partners/privacy-policy/>; Standard contractual clauses (ensuring level of data protection for processing in third countries): Binding internal data protection regulations as a basis for US data transfers: <https://www.zendesk.de/company/privacy-and-data-protection/#data-processing-agreement>.

## 10. Newsletter

### *10.1 General Information on Newsletter Dispatch*

With the following information we inform you about the contents of our newsletter as well as the registration, dispatch and statistical evaluation procedure and your rights of objection. By subscribing to our newsletter, you agree to receive it and to the procedures described.

Content of the newsletter: We send newsletters, e-mails, and other electronic notifications with promotional information (hereinafter referred to as "newsletter") only with the consent of the recipients or a legal permission. Insofar as the contents of the Newsletter are specifically described in the context of a registration, they are decisive for the consent of the users. Otherwise, our newsletters contain information about our services and us.

Double opt-in and logging: Registration for our newsletter is carried out in a so-called double opt-in process. This means that after registration you will receive an e-mail in which you are asked to confirm your registration. This confirmation is necessary so that no one can register with other e-mail addresses. The registrations for the newsletter are logged to be able to prove the registration process according to the legal requirements. This includes the storage of the registration and confirmation time, as well as the IP address. Likewise, the changes to your data stored with the shipping service provider are logged.

Registration data: To register for the newsletter, it is sufficient to enter your e-mail address. Optionally, we ask you to provide a name for the purpose of personal address in the newsletter.

The dispatch of the newsletter and the performance measurement associated with it are based on the consent of the recipients pursuant to Art. 6 (1) a, Art. 7 DSGVO in conjunction with § 7 (2) No. 3 UWG or based on the legal permission pursuant to § 7 (3) UWG.

The logging of the registration process is based on our legitimate interests pursuant to Art. 6 para. 1 lit. f DSGVO. Our interest is directed towards the use of a user-friendly as well as secure newsletter system that serves our business interests as well as meets the expectations of the users and furthermore allows us to prove consent.

Cancellation/Revocation - You can cancel the receipt of our newsletter at any time, i.e. revoke your consents. You will find a link to cancel the newsletter at the end of each newsletter. We may store unsubscribed email addresses for up to three years based on our legitimate interests before deleting them to be able to prove consent formerly given. The processing of this data is limited to the purpose of a possible defense of claims is limited. An individual deletion request is possible at any time, provided that the former existence of consent is confirmed at the same time.

### *10.2 Measuring the Success of Newsletters*

The newsletters contain a so-called "web beacon", i.e. a pixel-sized file that is retrieved from our server when the newsletter is opened, or if we use a shipping service provider, from their server. During this retrieval, technical information, such as information about the browser and your system, as well as your IP address and the time of the retrieval are collected.

This information is used for the technical improvement of the services based on the technical data or the target groups and their reading behavior based on their retrieval locations (which can be determined with the help of the IP address) or the access times. The statistical surveys also include the determination of whether the newsletters are opened, when they are opened and which links are clicked. For technical reasons, this information can be assigned to

individual newsletter recipients. However, it is neither our intention nor, if used, that of the dispatch service provider to observe individual users. The evaluations serve us much more to recognize the reading habits of our users and to adapt our content to them or to send different content according to the interests of our users.

### 10.3 Further information on processing procedures, methods, and services

Newsletters may be sent using the mailing service provider Mailjet SAS, 13-13 bis, rue de l'Aubrac, 75012 Paris, France. You can view the privacy policy of the mailing service provider here: <https://www.mailjet.de/privacy-policy/>. The shipping service provider is used based on our legitimate interests pursuant to Art. 6 para. 1 lit. f DSGVO and a contract processing agreement pursuant to Art. 28 para. 3 p. 1 DSGVO.

The dispatch service provider may use the data of the recipients in anonymized form, i.e. without assignment to a user, to optimize or improve its own services, e.g. to technically optimize the dispatch and presentation of the newsletters or for statistical purposes. However, the dispatch service provider does not use the data of our newsletter recipients to write to them itself or to pass the data on to third parties.

## 11 Presence in social networks (social media)

### *11.1 General Information on Presences in Social Networks*

We maintain online presences within social networks and process user data in this context in order to communicate with users active there or to offer information about us. We would like to point out that user data may be processed outside the area of the European Union. This may result in risks for the users because, for example, it could make it more difficult to enforce the rights of the users.

Furthermore, user data is usually processed within social networks for market research and advertising purposes. For example, usage profiles can be created based on the usage behavior and resulting interests of the users. The usage profiles can in turn be used, for example, to place advertisements within and outside the networks that presumably correspond to the interests of the users. For these purposes, cookies are usually stored on the users' computers, in which the usage behavior and the interests of the users are stored. Furthermore, data may also be stored in the usage profiles irrespective of the devices used by the users (especially if the users are members of the respective platforms and are logged in to them).

For a detailed presentation of the respective forms of processing and the options to object (opt-out), we refer to the privacy statements and information provided by the operators of the respective networks.

In the case of requests for information and the assertion of data subject rights, we also point out that these can be asserted most effectively with the providers. Only the providers have access to the users' data and can take appropriate measures and provide information directly. If you still need assistance, you can contact us.

Contact data (e.g. e-mail, telephone numbers); content data (e.g. entries in online forms), usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses) are processed.

All users of the respective social networks (e.g. website visitors, users of online services) are affected. The purpose of the processing is contact requests and communication, feedback (e.g. collecting feedback via online form), marketing and the processing is based on legitimate interest (Art. 6 para. 1 p. 1 lit. f. DSGVO).

### *11.2 Further Information on Processing Processes, Procedures and Services*

#### **Facebook pages**

With respect to profiles within the social network Facebook, we are jointly responsible with Meta Platforms Ireland Limited for collecting (but not further processing) data from visitors to our Facebook page (so-called "fan page"). This data includes information about the types of content users view or interact with, or the actions they take (see under "Things You and Others Do and Provide" in the Facebook Data Policy: <https://www.facebook.com/policy>), as well as information about the devices users use (e.g., IP addresses, operating system, browser type, language settings, cookie data; see under "Device Information" in the Facebook Data Policy: <https://www.facebook.com/policy>). As explained in the Facebook Data Policy under "How do we use this information?", Facebook also collects and uses information to provide analytics services, called "Page Insights," to Page operators to provide them with insights into how people interact with their Pages and with content associated with them. We have entered into a special agreement with Facebook ("Page Insights Information," [https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum)), which regulates which security measures Facebook must observe and in which Facebook has agreed to fulfill the data subject rights (i.e., users can, for example, direct information or deletion requests to Facebook). The rights of users (to information, deletion, objection and complaint to the competent supervisory authority), are not restricted by the agreements with Facebook. Further information can be found in the "Information on Page Insights" ([https://www.facebook.com/legal/terms/information\\_about\\_page\\_insights\\_data](https://www.facebook.com/legal/terms/information_about_page_insights_data)); service provider: Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland; Website: <https://www.facebook.com>; Privacy policy: <https://www.facebook.com/about/privacy>; Standard contractual clauses (ensuring level of data protection for processing in third countries): [https://www.facebook.com/legal/EU\\_data\\_transfer\\_addendum](https://www.facebook.com/legal/EU_data_transfer_addendum); Further information: Shared Responsibility Agreement: [https://www.facebook.com/legal/terms/information\\_about\\_page\\_insights\\_data](https://www.facebook.com/legal/terms/information_about_page_insights_data).

#### **LinkedIn**

Social network; service provider: LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland; website: <https://www.linkedin.com>; privacy policy: <https://www.linkedin.com/legal/privacy-policy>; order processing agreement: <https://legal.linkedin.com/dpa>; standard contractual clauses (ensuring level of data protection

for processing in third countries): <https://legal.linkedin.com/dpa>; opt-out: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.

### Vimeo

Social network and video platform; service provider: Vimeo Inc, Attention: Legal Department, 555 West 18th Street New York, New York 10011, USA; Website: <https://vimeo.com>; Privacy policy: <https://vimeo.com/privacy>. XingSoziales Network; Service provider: XING AG, Dammtorstraße 29-32, 20354 Hamburg, Germany; Website: <https://www.xing.de>; Privacy Policy: <https://privacy.xing.com/de/datenschutzerklaerung>.

### YouTube

Social network and video platform; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Privacy policy: <https://policies.google.com/privacy>; Opt-out: <https://adssettings.google.com/authenticated>.

## 12 Cookies, Google Analytics and Marketing

### *12.1 Cookies and the Right to Object to Direct Advertising*

"Cookies" are small files that are stored on users' computers. Different information can be stored within the cookies. The primary purpose of a cookie is to store information about a user (or the device on which the cookie is stored) during or after his or her visit to an online offer. Temporary cookies, or "session cookies" or "transient cookies", are cookies that are deleted after a user leaves an online offer and closes his browser. Such a cookie may store, for example, the contents of a shopping cart in an online store or a login status. Cookies that remain stored even after the browser is closed are referred to as "permanent" or "persistent". For example, the login status can be stored to simplify the login process for the user. Likewise, the interests of users can be stored in such a cookie, which is used for range measurement or marketing purposes. "Third-party cookies" are cookies that are offered by providers other than the responsible party that operates the online offer (otherwise, if it is only their cookies, it is called "first-party cookies"). Necessary - also called essential or absolutely necessary cookies - cookies may be absolutely necessary for the operation of a website, e.g. to store logins and/or other user input, or for security reasons. Statistical, marketing and/or personalization cookies are used, for example, in the context of range measurement, when user interest or user behavior is stored in a user profile. Such cookies are used, for example, to show users content that matches their potential interests.

We may use temporary and permanent cookies and provide information about this in our privacy policy. Unless we state otherwise regarding the storage period of permanent cookies, the storage period can be up to two years.

The legal basis on which we process personal data using cookies depends on whether you are asked for consent. If you consent to the use of cookies, the legal basis for processing your data is your declared consent. Otherwise, the data processed with the help of cookies is

processed on the basis of our legitimate interests (e.g. in a business operation of our online offer and its improvement) or to fulfill our contractual obligations.

Depending on whether the processing is based on consent or legal permission, you have the option at any time to revoke a previously given consent or to object to the processing of your data by cookie technologies ("opt-out"). A general objection to the use of cookies used for online marketing purposes can be declared for many services, especially in the case of tracking, via the U.S. site <http://www.aboutads.info/choices/> or the EU site <http://www.youronlinechoices.de/>. Furthermore, the storage of cookies can be achieved by disabling them in the browser settings. Please note that not all functions of this online offer can then be used.

### **BorlabsCookie**

Cookie consent management; Service provider: Borlabs; Website: <https://de.borlabs.io/borlabs-cookie/>; Other information: An individual user ID, language, as well as types of consents and the time of their submission are stored on the server side and in the cookie on the users' device.

### **Content Delivery Network from Cloudflare**

We use a so-called "Content Delivery Network" (CDN), offered by Cloudflare, Inc., 101 Townsend St, San Francisco, CA 94107, USA. A CDN is a service with the help of which content of our online offer, in particular large media files, such as graphics or scripts are delivered more quickly with the help of regionally distributed servers connected via the Internet. User data is processed solely for the aforementioned purposes and to maintain the security and functionality of the CDN. For more information, please see Cloudflare's privacy policy: <https://www.cloudflare.com/security-policy>.

## *12.2 Use of Google Products and Services*

### *12.2.1 Google Analytics*

We use Google Analytics, a web analytics service provided by Google LLC ("Google"), on the basis of our legitimate interests (i.e. interest in the analysis, optimization and economic operation of our online offering within the meaning of Art. 6 (1) f) DSGVO) or user consent. Google uses cookies. The information generated by the cookie about the use of the online offer by users is usually transmitted to a Google server in the U.S. and stored there. Google will use this information on our behalf to evaluate the use of our online offer by users, to compile reports on the activities within this online offer and to provide us with other services related to the use of this online offer and Internet use. In doing so, pseudonymous user profiles can be created from the processed data. We only use Google Analytics with IP anonymization activated. This means that the IP address of the user is not transmitted by Google within the member states of the European Union or other countries.

States party to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there.



The IP address transmitted by the user's browser is not merged with other data from Google. Users can prevent the storage of cookies by setting their browser software accordingly; users can also prevent the collection of the data generated by the cookie and related to their use of the online offer to Google, as well as the processing of this data by Google, by downloading and installing the browser plugin available at the following link:

<http://tools.google.com/dlpage/gaoptout?hl=de>.

For more information about Google's use of data, settings and opt-out options, please refer to Google's privacy policy (<https://policies.google.com/technologies/ads>) and the settings for the display of advertising by Google (<https://adssettings.google.com/authenticated>).

#### 12.2.2 Target Group Formation with Google Analytics

We use Google Analytics to display the ads placed through within advertising services of Google and its partners, only to those users who have also shown an interest in our online offer or have certain characteristics (e.g. interests in certain topics or products determined on the basis of the websites visited), which we transmit to Google (so-called "Remarketing Audiences", or "Google Analytics Audiences"). With the help of Remarketing Audiences, we also want to ensure that our ads correspond to the potential interest of users.

#### 12.2.3 Google Tag Manager

Google Tag Manager is a solution that allows us to manage so-called website tags via an interface (and thus, for example, integrate Google Analytics and other Google marketing services into our online offering). The tag manager itself (which implements the tags) does not process any personal data of the users. With regard to the processing of users' personal data, please refer to the following information on Google services. Usage guidelines: <https://www.google.com/intl/de/tagmanager/use-policy.html>.

#### 12.2.4 Google AdWords and Conversion Measurement

We use the services of Google LLC, 1600 Amphitheatre Park, Mountain View, CA 92.4, USA, ("Google") on the basis of our legitimate interests (i.e. interest in the analysis, optimization and economic operation of our online offer within the meaning of Art. 6 para. 1 lit. f. DSGVO) the services of Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA, ("Google").

We use the online marketing method Google "AdWords" to place ads in the Google advertising network (e.g. in search results, in videos, on web pages, etc.) so that they are displayed to users who have a presumed interest in the ads. This allows us to display ads for and within our Online Offerings in a more targeted manner to present users only with ads that potentially match their interests. If, for example, a user is shown ads for products in which he or she has expressed interest on other online offers, this is referred to as "remarketing". For these purposes, when our website and other websites on which the Google advertising network is active are called up, a code is executed directly by Google and

so-called (re)marketing tags (invisible graphics or code, also referred to as "web beacons") are integrated into the website. With their help, on the device of the user an individual cookie, i.e. a small file, is stored (comparable technologies can also be used instead of cookies). This file records which websites the user has visited, which content the user is interested in and which offers the user has clicked on, as well as technical information about the browser and operating system, referring websites, time of visit and other information about the use of the online offer.

Furthermore, we receive an individual "conversion cookie". The information obtained with the help of the cookie is used by Google to create conversion statistics for us. However, we only learn the anonymous total number of users who clicked on our ad and were redirected to a page tagged with a conversion tracking tag. However, we do not receive any information that personally identifies users.

The users' data is processed pseudonymously within the Google advertising network. That is, Google does not store and process, for example, the name or email address of users, but processes the relevant data cookie-related within pseudonymous user profiles. I.e. from Google's perspective, the ads are not managed and displayed for a specifically identified person, but for the cookie holder, regardless of who this cookie holder is. This does not apply if a user has explicitly allowed Google to process the data without this pseudonymization. The information collected about users is transmitted to Google and stored on Google's servers in the USA.

For more information about Google's use of data, settings and opt-out options, please refer to Google's privacy policy (<https://policies.google.com/technologies/ads>) and the settings for the display of advertisements by Google (<https://adssettings.google.com/authenticated>).

#### 12.2.5 Google DoubleClick

We use the services of Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 92056, USA, ("Google") on the basis of our legitimate interests (i.e. interest in the analysis, optimization and economic operation of our online offer within the meaning of Art. 6 para. 1 lit. f. DSGVO). DSGVO) the services of Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA, ("Google").

We use the online marketing method Google "DoubleClick" to place ads in the Google advertising network (e.g. in search results, in videos, on websites, etc.). DoubleClick is characterized by the fact that ads are displayed in real time based on presumed user interests. This allows us to display ads for and within our online offering in a more targeted manner to present users only with ads that potentially match their interests. If, for example, a user is shown ads for products in which he or she was interested on other online offers, this is referred to as "remarketing". For these purposes, when our website and other websites on which the Google advertising network is active are called up, a code is executed directly by Google and so-called (re)marketing tags (invisible graphics or code, also referred to as "web beacons") are integrated into the website. With their help, an individual cookie, i.e. a small file, is stored on the user's device (comparable technologies can also be used instead of

cookies). This file records which web pages the user has visited, which content the user is interested in and which offers the user has clicked on, as well as technical information about the browser and operating system, referring web pages, time of visit and other information about the use of the online offer.

The IP address of the user is also recorded, whereby this is shortened within member states of the European Union or in other contracting states of the Agreement on the European Economic Area and only in exceptional cases transferred in full to a Google server in the USA and shortened there. The aforementioned information may also be combined on the part of Google with such information from other sources. If the user subsequently visits other websites, he can be shown ads tailored to him according to his presumed interests based on his user profile.

User data is processed pseudonymously within the Google advertising network. This means that Google does not store and process the name or e-mail address of the user, for example, but processes the relevant data on a cookie basis within pseudonymous user profiles. I.e. from Google's perspective, the ads are not managed and displayed for a specifically identified person, but for the cookie holder, regardless of who this cookie holder is. This does not apply if a user has expressly allowed Google to process the data without this pseudonymization. The information collected by Google marketing services about users is transmitted to Google and stored on Google's servers in the USA.

For more information about Google's use of data, settings and opt-out options, please refer to Google's privacy policy (<https://policies.google.com/technologies/ads>) and the settings for the display of advertisements by Google (<https://adssettings.google.com/authenticated>).