



# Privacy policy

## of **DBI Gas- und Umwelttechnik GmbH**

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## Privacy policy

We are very delighted that you have shown interest in our enterprise. Data protection is of a particularly high priority for the management of the DBI Gas- und Umwelttechnik GmbH. The use of the Internet pages of the DBI Gas- und Umwelttechnik GmbH is possible without any indication of personal data; however, if a data subject wants to use special enterprise services via our website, processing of personal data could become necessary. However, if a person concerned wishes to make use of special services of our company via our website, it may be necessary to process personal data. If the processing of personal data is necessary and there is no legal basis for such processing, we generally obtain the consent of the data subject.

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

As the controller, the DBI Gas- und Umwelttechnik GmbH has implemented numerous technical and organizational measures to ensure the most complete protection of personal data processed through this website. Nevertheless, Internet-based data transmissions can generally have security gaps, so that absolute protection cannot be guaranteed. For this reason, every data subject is free to transmit personal data to us by alternative means, for example by telephone.

### 1. Definitions

The data protection declaration of the DBI Gas- und Umwelttechnik GmbH is based on the terms used by the European legislator for the adoption of the General Data Protection Regulation (GDPR). Our privacy policy should be easy to read and understand for the public as well as for our customers and business partners. To ensure this, we would like to explain the terms used in advance.

We use the following terms, among others, in this privacy policy:

#### **a) personal data**

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 or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

#### **b) Person concerned**

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

### **c) Processing**

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

### **d) Restriction of processing**

Restriction of processing is the marking of stored personal data with the aim of restricting its future processing.

### **e) Profiling**

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

### **f) Pseudonymization**

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

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

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

### **h) Processor**

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

### **i) Recipient**

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

## **j) Third party**

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

## **k) Consent**

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

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

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

DBI Gas- und Umwelttechnik GmbH  
Karl-Heine-Straße 109/111  
04229 Leipzig  
Germany  
Phone: +49 (0) 341 2457-113  
E-mail: [kontakt\[at\]dbi-gruppe.de](mailto:kontakt[at]dbi-gruppe.de)  
Website: <http://www.dbi-gruppe.de>  
and <http://www.dbi-gut.de>

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

The data protection officer of the controller is

Frank Hillmer  
SIKKER GmbH  
Kreuzstr. 10  
04103 Leipzig  
Germany  
E-mail: [info\[at\]sikker.de](mailto:info[at]sikker.de)  
Website: [www.sikker.de](http://www.sikker.de)

Any data subject can contact our data protection officer directly at any time with any questions or suggestions regarding data protection.

## **4. Collection of general data and information**

The website of the DBI Gas- und Umwelttechnik GmbH collects a series of general data and information when a data subject or automated system calls up the website. This general data and information is stored in the server log files. The (1) browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system accesses our website (so-called referrer), (4) the sub-websites which are accessed via an accessing system on our website can be recorded, (5) the date and time of access to the website, (6) an internet protocol address (IP

address), (7) the internet service provider of the accessing system and (8) other similar data and information used for security purposes in the event of attacks on our information technology systems.

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

## **5. Registration on our website**

The data subject has the option of registering on the controller's website by providing personal data (Article 6(1)(b) GDPR). Which personal data is transmitted to the controller is determined by the respective input mask used for registration. The personal data entered by the data subject is collected and stored exclusively for internal use by the controller and for its own purposes (Art. 6 (1) (f) GDPR). The controller may arrange for the data to be passed on to one or more processors, for example a parcel service provider (Art. 6 para. 1 lit. b GDPR or Art. 6 para. 1 lit. f GDPR), who will also use the personal data exclusively for internal use attributable to the controller.

By registering on the controller's website, the IP address assigned by the data subject's internet service provider (ISP), the date and time of registration are also stored (Art. 6 (1) (f) GDPR). The storage of this data takes place against the background and therefore in our legitimate interest that this is the only way to prevent the misuse of our services and, if necessary, to make it possible to investigate criminal offenses committed. In this respect, the storage of this data is necessary to safeguard the controller (Section 25 (2) TDDDg). In principle, this data is not passed on to third parties unless there is a legal obligation to pass it on or it serves the purpose of criminal prosecution.

The registration of the data subject with voluntary provision of personal data (pursuant to Art. 6 para. 1 lit. b GDPR) serves the controller to offer the data subject content or services which, due to the nature of the matter, can only be offered to registered users. Registered persons are free to change the personal data provided during registration at any time or to have it completely deleted from the controller's database.

The controller shall provide any data subject at any time upon request with information about what personal data is stored about the data subject. Furthermore, the controller shall rectify or erase personal data at the request or indication of the data subject, insofar as this does not conflict with any statutory retention obligations. All of the controller's employees are available to the data subject as contact persons in this context.

## **6. Subscription to our newsletter**

On the website of the DBI Gas- und Umwelttechnik GmbH, users are given the opportunity to subscribe to our enterprise's newsletter. (Art 6 para 1 lit a GDPR). The input mask used for this purpose determines what personal data are transmitted to the controller when the newsletter is ordered.

The DBI Gas- und Umwelttechnik GmbH informs its customers and business partners regularly by means of a newsletter about enterprise offers. The newsletter of our company can only be received by the data subject if (1) the data subject has a valid e-mail address and (2) the data subject registers for the newsletter shipping. For legal reasons, a confirmation e-mail is sent to the e-mail address entered by a data subject for the first time for the newsletter mailing using the double opt-in procedure. This confirmation email is used to check whether the owner of the email address as the data subject has authorized the receipt of the newsletter.

When registering for the newsletter, we also store the IP address assigned by the Internet service provider (ISP) of the computer system used by the data subject at the time of registration as well as the date and time of registration (Art. 6 para. 1 lit. f GDPR). The collection of this data is in our legitimate interest and is necessary in order to be able to trace the (possible) misuse of a data subject's email address at a later date and therefore serves as legal protection for the controller.

The personal data collected when registering for the newsletter will be used exclusively to send our newsletter. Furthermore, subscribers to the newsletter may be informed by e-mail if this is necessary for the operation of the newsletter service or a registration in this regard, as could be the case in the event of changes to the newsletter offer or changes to the technical circumstances. The personal data collected as part of the newsletter service will not be passed on to third parties. The subscription to our newsletter can be canceled by the data subject at any time. The consent to the storage of personal data, which the data subject has given us for the newsletter dispatch, can be revoked at any time. There is a corresponding link in every newsletter for the purpose of revoking consent. It is also possible to unsubscribe from the newsletter at any time directly on the controller's website or to inform the controller of this in another way.

## **7. Newsletter tracking**

The newsletter of the DBI Gas- und Umwelttechnik GmbH contains so-called tracking pixels. A tracking pixel is a miniature graphic that is embedded in e-mails that are sent in HTML format to enable log file recording and log file analysis. This allows a statistical evaluation of the success or failure of online marketing campaigns to be carried out. Based on the embedded tracking pixel, the DBI Gas- und Umwelttechnik GmbH may see if and when an e-mail was opened by a data subject, and which links in the e-mail were called up by data subjects.

Such personal data collected via the tracking pixels contained in the newsletters are stored and evaluated in accordance with the consent of the data subject (Art 6 para 1 lit a GDPR in conjunction with § 25 TDDDG) - if there is a reference to the individual data subject, or by the controller in our legitimate interest - provided that the data obtained through storage and evaluation is anonymized. This is done in order to optimize the newsletter dispatch and to adapt the content of future newsletters even better to the interests of the data subject. This personal data is not passed on to third parties. Data subjects are entitled at any time to revoke the separate declaration of consent given in this regard via the double opt-in procedure. After revocation, this personal data will be deleted by the controller. The DBI Gas- und Umwelttechnik GmbH automatically regards a withdrawal from the receipt of the newsletter as a revocation.

## **8. Download "Calculation tool for third-party damage to cables"**

We provide operators of gas supply and gas distribution networks as well as operators of transmission networks within the meaning of Section 3 No. 5, 7 and 8 EnWG with a file-based calculation tool "Calculation tool for third-party damage to pipelines" (hereinafter "Tool") on our website for downloading to calculate the amount of gas leaked in the event of damage. In connection with the download of the tool, we process the personal data provided by you during the download process. This involves the following personal data:

- Salutation
- Name
- first name
- e-mail address
- Company

As the offer to download and use the tool is aimed exclusively at operators of gas supply and distribution networks as well as operators of transmission networks pursuant to Sections 3 No. 5, 7, 8 EnWG, we process the personal data provided during the download process in order to check your authorization to download and use the tool. The above processing is carried out on the basis of the user relationship established by the download of the tool in accordance with Art. 6 para. 1 lit. b GDPR.

In addition, we process the personal data provided during the download process (title, name, e-mail address) for the purpose of regularly sending and communicating specific information on services, products and events of DBI Gas- und Umwelttechnik GmbH. The processing of the personal data provided during the download process for advertising purposes is carried out on the basis of consent granted in accordance with Art. 6 para. 1 lit. a GDPR in conjunction with § 25 TDDDG. You can revoke your consent to the processing of your personal data for advertising purposes at any time with effect for the future. You can declare your revocation via the corresponding "unsubscribe link" in each mailing contained therein, by e-mail to kontakt@dbi-gruppe.de or by sending a message to the contact details given in the imprint.

The personal data you provide during the download process will be stored until you withdraw your consent and then deleted from the mailing list for advertising purposes. After you withdraw your consent, your e-mail address may be stored in a so-called "blacklist" in order to prevent you from receiving further e-mails with advertising content from us after you have withdrawn your consent. The e-mail addresses stored in the blacklist are used exclusively for this purpose and are not merged with other data. The storage of the e-mail address within a blacklist serves both your interest and our interest in complying with the legal requirements when sending advertising by e-mail. The processing is therefore carried out on the basis of a legitimate interest in accordance with Art. 6 para. 1 lit. f GDPR.

## **9. Contact via the website**

The website of the DBI Gas- und Umwelttechnik GmbH contains information that enables a quick electronic contact to our enterprise, as well as direct communication with us, which also includes a general address of the so-called electronic mail (e-mail address). If a data subject contacts the data controller by e-mail or via a contact form, the personal data transmitted by the data subject is automatically stored. Such personal data transmitted on a voluntary basis by a data subject to the controller (pursuant to Art. 6 para. 1 lit. a, Art. 6 para. 1 lit. b or Art. 6 para. 1 lit. f GDPR) are stored for the purpose of processing or contacting the data subject. This personal data will not be passed on to third parties.

## **10. Routine deletion and blocking of personal data**

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

If the storage purpose no longer applies or if a storage period prescribed by the European legislator or another competent legislator expires, the personal data will be routinely blocked or deleted in accordance with the statutory provisions.

## **11. Rights of the data subject**

### **a) Right to confirmation**

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

### **b) Right to information**

Any person affected by the processing of personal data has the right, granted by the European legislator of directives and regulations, to obtain from the controller free information about the personal data stored about him/her and a copy of this information at any time. Furthermore, the European legislator has granted the data subject access to the following information:



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

Furthermore, the data subject has a right to information as to whether personal data has been transferred to a third country or to an international organization. If this is the case, the data subject also has the right to obtain information about the appropriate safeguards in connection with the transfer.

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

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

Any person affected by the processing of personal data has the right granted by the European legislator of directives and regulations to demand the immediate correction of incorrect personal data concerning them. Furthermore, the data subject has the right to request the completion of incomplete personal data, including by means of a supplementary declaration, taking into account the purposes of the processing.

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

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

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

- The personal data were collected or otherwise processed for purposes for which they are no longer necessary.
- The data subject withdraws consent on which the processing is based according to point (a) of Article 6(1) of the GDPR, point (a) of Article 25 of the TDDDG or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing.
- The data subject objects to the processing pursuant to Art. 21 (1) GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Art. 21 (2) GDPR.

- The personal data was processed unlawfully.
- The deletion of personal data is necessary to fulfill a legal obligation under Union law or the law of the Member States to which the controller is subject.
- The personal data was collected in relation to information society services offered in accordance with Art. 8 para. 1 GDPR.

If one of the aforementioned reasons applies, and a data subject wishes to request the erasure of personal data stored by the DBI Gas- und Umwelttechnik GmbH, he or she may, at any time, contact any employee of the controller. An employee of DBI Gas- und Umwelttechnik GmbH shall promptly ensure that the erasure request is complied with immediately.

If the personal data have been made public by the DBI Gas- und Umwelttechnik GmbH and our company, as the controller, is obliged pursuant to Article 17(1) of the GDPR to erase the personal data, the DBI Gas- und Umwelttechnik GmbH shall implement suitable measures, including technical measures, to safeguard the personal data. 1 DS-GVO, DBI Gas- und Umwelttechnik GmbH shall take appropriate measures, including technical measures, taking into account the available technology and the implementation costs, to inform other persons responsible for data processing who process the published personal data, that the person concerned has requested the deletion of all links to this personal data or of copies or replications of this personal data from these other persons responsible for data processing, insofar as the processing is not necessary. An employees of the DBI Gas- und Umwelttechnik GmbH will arrange the necessary measures in individual cases.

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

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

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

If one of the aforementioned conditions is met, and a data subject wishes to request the restriction of the processing of personal data stored by the DBI Gas- und Umwelttechnik GmbH, he or she may at any time contact any employee of the controller. The employee of the DBI Gas- und Umwelttechnik GmbH will arrange the restriction of the processing.

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

Any person affected by the processing of personal data has the right, granted by the European legislator, to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format. He or she also has the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where the processing is based on consent pursuant to point (a) of Article 6(1) GDPR in conjunction with Section 25 TDDDG or point (a) of Article 9(2) GDPR or on a contract pursuant to point (b) of Article 6(1) GDPR and the processing is carried out by automated means, provided that the processing is not

necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Furthermore, in exercising their right to data portability pursuant to Art. 20 (1) GDPR, the data subject has the right to have the personal data transmitted directly from one controller to another, where technically feasible and provided that this does not adversely affect the rights and freedoms of others.

In order to assert the right to data portability, the data subject may at any time contact any employee of the DBI Gas- und Umwelttechnik GmbH.

#### **g) Right to object**

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

The DBI Gas- und Umwelttechnik GmbH shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defense of legal claims.

If the DBI Gas- und Umwelttechnik GmbH processes personal data for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing. This also applies to profiling insofar as it is associated with such direct advertising. If the data subject objects to the DBI Gas- und Umwelttechnik GmbH to the processing for direct marketing purposes, the DBI Gas- und Umwelttechnik GmbH will no longer process the personal data for these purposes.

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

In order to exercise the right to object, the data subject may contact any employee of the DBI Gas- und Umwelttechnik GmbH. The data subject is also free, in the context of the use of information society services, and notwithstanding Directive 2002/58/EC, to exercise his or her right to object by automated means using technical specifications.

#### **h) Automated decisions in individual cases including profiling**

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

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

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

## **i) Right to withdraw consent under data protection law**

Any person affected by the processing of personal data has the right granted by the European legislator to withdraw consent to the processing of personal data at any time.

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

## **12. Data protection for applications and in the application process**

The controller collects and processes the personal data of applicants for the purpose of handling the application process. Processing may also be carried out electronically. This is particularly the case if an applicant submits relevant application documents to the controller by electronic means, for example by email or via a web form on the website. If the controller concludes an employment contract with an applicant, the transmitted data will be stored for the purpose of processing the employment relationship in compliance with the statutory provisions. If the controller does not conclude an employment contract with the applicant, the application documents will be automatically deleted two months after notification of the rejection decision, provided that no other legitimate interests of the controller stand in the way of deletion. Other legitimate interest in this sense is, for example, a burden of proof in proceedings under the General Equal Treatment Act (AGG).

## **13. Analysis services**

### **12.1 Google Analytics**

The controller has integrated the Google Analytics component (with anonymization function) on this website. Google Analytics is a web analysis service. Web analysis is the collection, gathering and evaluation of data about the behavior of visitors to websites. Among other things, a web analysis service collects data on the website from which a data subject came to a website (so-called referrer), which subpages of the website were accessed or how often and for how long a subpage was viewed. Web analysis is mainly used to optimize a website and for the cost-benefit analysis of Internet advertising.

The operating company of the Google Analytics component is Google Ireland Limited, Gordon House, Barrow Street, Dublin, D04 E5W5, Ireland.

The data controller uses the addition "\_gat.\_anonymizeIp" for web analysis via Google Analytics. By means of this addition, the IP address of the Internet connection of the data subject is shortened and anonymized by Google if access to our Internet pages is from a member state of the European Union or from another state party to the Agreement on the European Economic Area.

The purpose of the Google Analytics component is to analyze the flow of visitors to our website. Google uses the data and information obtained, among other things, to evaluate the use of our website, to compile online reports for us that show the activities on our website, and to provide other services related to the use of our website.

Google Analytics places a cookie on the data subject's IT system. What cookies are has already been explained above. By setting the cookie, Google is enabled to analyze the use of our website. Each time one of the individual pages of this website is accessed, which is operated by the data controller and on which a Google Analytics component has been integrated, the Internet browser on the information technology system of the data subject is automatically prompted by the respective Google Analytics component to transmit data to Google for the purpose of online analysis. During the course of this technical procedure, Google gains knowledge of personal information, such as the IP address of the data subject, which serves Google, inter alia, to understand the origin of visitors and clicks, and subsequently create commission settlements.

The cookie is used to store personal information, such as the access time, the location from which access was made and the frequency of visits to our website by the data subject. Each time our website is visited, this personal data, including the IP address of the Internet connection used by the data subject, is transmitted to Google in the United States of America. This personal data is stored by Google in the United States of America. Google may pass on this personal data collected via the technical process to third parties.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such a setting of the Internet browser used would also prevent Google from placing a cookie on the data subject's IT system. In addition, a cookie already set by Google Analytics can be deleted at any time via the internet browser or other software programs. The cookie is primarily only set if you have given your consent in accordance with Art. 6 para. 1 lit. a GDPR in conjunction with § 25 TDDDG. You have the right to withdraw your consent at any time. The lawfulness of the processing of your personal data up to the time of withdrawal remains unaffected by this.

Furthermore, the data subject has the option of objecting to and preventing the collection of data generated by Google Analytics relating to the use of this website and the processing of this data by Google. To do this, the data subject must download and install a browser add-on from the link <https://tools.google.com/dlpage/gaoptout>. This browser add-on informs Google Analytics via JavaScript that no data and information about visits to websites may be transmitted to Google Analytics. The installation of the browser add-on is considered an objection by Google. If the data subject's IT system is deleted, formatted or reinstalled at a later date, the data subject must reinstall the browser add-on in order to deactivate Google Analytics. If the browser add-on is uninstalled or deactivated by the data subject or another person who is attributable to their sphere of control, it is possible to reinstall or reactivate the browser add-on.

Further information and the applicable data protection provisions of Google may be retrieved under <https://www.google.de/intl/de/policies/privacy/> and under <https://www.google.com/analytics/terms/>. Google Analytics is explained in more detail at this link [https://www.google.com/intl/de\\_de/analytics/](https://www.google.com/intl/de_de/analytics/).

## 12.2 LinkedIn

Links to the "LinkedIn" network (LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland) are integrated on our pages. You can recognize the links by the LinkedIn logo on our pages. If you follow these links, your browser establishes a direct connection with the LinkedIn server. This allows LinkedIn to associate your visit to our pages with your user account. We would like to point out that, as the provider of the pages, we have no knowledge of the content of the transmitted data or its use by LinkedIn. Further information

You can find more information on this in LinkedIn's privacy policy at <https://linkedin.com/legal/privacypolicy>. If you do not want LinkedIn to be able to associate your visit to our pages with your LinkedIn user account, please log out of your LinkedIn user account.

## 12.3 X

Links to the short message network "X" (X Corp., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA) are integrated on our pages. You can recognize the links by the X logo on our pages. If you follow these links, your browser establishes a direct connection with the X server. This allows X to assign the visit to our pages to your user account. We would like to point out that, as the provider of the pages, we have no knowledge of the content of the transmitted data or its use by X. Further information on this can be found in X's privacy policy at <https://x.com/de/privacy>. If you do not want X to be able to associate your visit to our pages with your X user account, please log out of your X user account.

## 12.4 YouTube

Links to the video platform "Youtube" (Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland) are integrated on our pages. You can recognize the links by the YouTube logo on our pages. If you follow these links, your browser establishes a direct connection with the Google server. This allows YouTube to associate your visit to our website with your user account. We would like to point out that, as the provider of the pages, we have no knowledge of the content of the transmitted data or its use by YouTube. Further information on this can be found in Google's privacy policy at <https://policies.google.com/privacy>. If you do not want YouTube to be able to associate your visit to our pages with your YouTube user account, please log out of your YouTube user account.

## 12.5 Xing

Our pages contain links to the external social network "XING" (XING AG, Gänsemarkt 43, 20354 Hamburg, Germany). The links are identified on our website by the XING logo. If you follow these links, your browser establishes a direct connection to the XING servers. XING does not store any personal data about you when you access this website. In particular, XING does not store any IP addresses. You can access the latest data protection information on XING on this website: [https://www.xing.com/app/share?op=data\\_protection](https://www.xing.com/app/share?op=data_protection).

## 14. Links to other websites

For content from other providers to which links are provided from our company website, the information on data protection provided there applies. In particular, these providers are responsible for their own content and the data processing there.

## 15. Scripts

### 15.1 Stack

We use StackPath CDN to properly provide the content of our website. StackPath CDN is a service of StackPath, LLC, which acts as a content delivery network (CDN) on our website.

A CDN helps to provide the content of our online offer, in particular files such as graphics or scripts, more quickly with the help of regionally or internationally distributed servers. When you access this content, you connect to the servers of StackPath, LLC, 2021 McKinney Ave. Suite 1100 Dallas, TX 75201, USA, whereby your IP address and possibly browser data such as your user agent are transmitted. This data is processed exclusively for the above-mentioned purposes and to maintain the security and functionality of StackPath CDN.

#### a) Purpose and legal basis

Your personal data will be processed on the basis of your consent in accordance with Art. 6 para. 1 lit. a GDPR in conjunction with § 25 TDDDG. You have the right to withdraw your consent to the processing of your data. The lawfulness of the processing of your personal data up to the time of revocation remains unaffected.

#### b) Storage duration

The specific storage period of the processed data depends on your consent to the use of StackPath, LLC. Further information can be found in the privacy policy for StackPath CDN: <https://www.stackpath.com/legal/privacy-statement/>.

### 13.2 jQuery

We use jQuery CDN to properly deliver the content of our website. jQuery CDN is a service provided by jQuery, which acts as a content delivery network (CDN) on our website.

A CDN helps to provide the content of our online offer, in particular files such as graphics or scripts, more quickly with the help of regionally or internationally distributed servers. When you access this content, you establish a connection to jQuery servers, whereby your IP address and possibly browser data such as your user agent are transmitted. This data is processed exclusively for the above-mentioned purposes and to maintain the security and functionality of jQuery CDN.

#### a) Purpose and legal basis

Your personal data will be processed on the basis of your consent in accordance with Art. 6 para. 1 lit. a GDPR in conjunction with § 25 TDDDG. You have the right to withdraw your consent to the processing of your data. The lawfulness of the processing of your personal data up to the time of revocation remains unaffected.

#### b) Storage duration

The specific storage period of the processed data depends on your consent to the services of jQuery. Further information can be found in the privacy policy for jQuery CDN: <https://www.stackpath.com/legal/privacy-statement/>.

## 16. Legal basis of the processing

Art. 6 I lit. a GDPR in conjunction with Section 25 TDDDG serves our company as the legal basis for processing operations for which we obtain consent for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as is the case, for example, when processing operations are necessary for the supply of goods or to provide any other service or consideration, the processing is based on Art. 6 I lit. b GDPR. The same applies to such processing operations that are necessary to carry out pre-contractual measures, for example in cases of inquiries about our products or services. If our company is subject to a legal obligation which requires the processing of personal data, such as for the fulfillment of tax obligations, the processing is based on Art. 6 I lit. c GDPR. In rare cases, the processing of personal data may become necessary in order to protect the vital interests of the data subject or another natural person. This would be the case, for example, if a visitor were injured in our company and their name, age, health insurance data or other vital information would have to be passed on to a doctor, hospital or other third party. The processing would then be based on Art. 6 para. 1 lit. d GDPR. Ultimately, processing operations could be based on Art. 6 para. 1 lit. f GDPR. This legal basis is used for processing operations which are not covered by any of the abovementioned legal grounds, if processing is necessary for the purposes of the legitimate interests pursued by our company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. We are permitted to carry out such processing operations in particular because they have been specifically mentioned by the European legislator. In this respect, it took the view that a legitimate interest could be assumed if the data subject is a customer of the controller (Recital 47 Sentence 2 GDPR).

## 17. Duration for which the personal data is stored

We store the personal data collected by us for as long as is necessary for our purposes or for as long as the data subject has consented to further storage in accordance with the provisions of the GDPR.

**16.1** The personal data collected by us for the order / contract will be stored until the expiry of the statutory retention obligations (6 years after the end of the calendar year in which the contract was terminated) and then deleted, unless we are obliged to store it for a longer period in accordance with Article 6 para. 1 sentence 1 lit. c GDPR due to tax and commercial law storage and documentation obligations (from HGB, StGB or AO) or the customers have consented to further storage in accordance with Art. 6 para. 1 sentence 1 lit. a GDPR.

**16.2 The relevant** retention and documentation obligations under tax and commercial law provide for a retention period of six or ten years for the commercial documents specified in Sections 238 and 257 of the German Commercial Code. Section 147 of the German Fiscal Code contains corresponding provisions for the retention of the documents mentioned therein.

**16.3 The** expiry of the retention period does not automatically result in a deletion obligation, as there may still be a legitimate interest in archiving, e.g. in order to be able to provide information in the event of legal disputes.

## 18. Legal or contractual provisions for the provision of personal data; necessity for the conclusion of the contract; obligation of the data subject to provide the personal data; possible consequences of non-provision

We would like to inform you that the provision of personal data is partly required by law (e.g. tax regulations) or may also result from contractual regulations (e.g. information on the contractual partner). Sometimes it may be necessary for a contract to be concluded for a data subject to provide us with personal data that must subsequently be processed by us. For example, the data subject is obliged to provide us with personal data if our company concludes a contract with them. Failure to provide the personal data would mean that the contract with the data subject could not be concluded. Before personal data is provided by the data subject, the data subject must contact one of our employees. Our employee will



inform the data subject on a case-by-case basis whether the provision of the personal data is required by law or contract or is necessary for the conclusion of the contract, whether there is an obligation to provide the personal data and what the consequences would be if the personal data were not provided.

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

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

Status: 01.07.2024