

## Contents

I.	General information about data processing.....	1
II.	Provision of the website and creation of logfiles .....	2
III.	Usage of Cookies.....	3
IV.	Contact form and e-mail contact.....	4
V.	Newsletter.....	6
VI.	Web analysis by Matomo (formerly PIWIK) .....	7
VII.	Web analysis by Google Analytics .....	8
VIII.	Rights of the data subject .....	11

## I. General information about data processing

### 1. Scope of processing of personal data

In principle, we process personal data of our users only insofar as this is necessary to provide a functioning website and our content and services. The processing of personal data of our users takes place regularly only with the consent of the user. An exception applies to cases in which prior consent is not possible for reasons of fact and allows the processing of the data by law.

### 2. Legal basis for processing personal data

Insofar as we obtain the consent of the data subject for processing of personal data, Art. 6 para. 1 lit. a EU General Data Protection Regulation (GDPR) serves as legal basis.

If processing is necessary to safeguard the legitimate interests of our company or a third party, and if the interests, fundamental rights and freedoms of the data subject do not prevail over the first interest, Art. 6 para. 1 lit. f GDPR serves as legal basis for processing.

### 3. Data deletion and storage period

The personal data of the data subject will be deleted or blocked as soon as the purpose of the storage is deleted. In addition, such storage may be provided for by the European or national legislator in EU regulations, laws or other regulations to which the controller is subject. Blocking or deletion of the data also takes place when a storage period prescribed by the standards mentioned expires, unless there is a need for further storage of the data for conclusion of a contract or fulfillment of the contract.

## **II. Provision of the website and creation of logfiles**

### **1. Scope of processing of personal data**

Each time our website is accessed, our system automatically collects data and information from the computer system of the calling computer. The following data is collected here:

- (1) Information about the browser type and version used
- (2) The operating system of the user
- (3) The Internet service provider of the user
- (4) The IP address of the user
- (5) Date and time of access
- (6) Websites from which the system of the user comes to our website
- (7) Web sites accessed by the user's system through our website.

The data is also stored in the log files of our system. A storage of this data together with other personal data of the user does not take place.

### **2. Legal basis for processing personal data**

The legal basis for the temporary storage of data and log files is Art. 6 para. 1 lit. f GDPR.

### **3. Purpose of the data processing**

The temporary storage of the IP address by the system is necessary to allow delivery of the website to the computer of the user. To do this, the user's IP address must be kept for the duration of the session.

Storage in log files is done to ensure the functionality of the website. If the data is stored in log files, the IP addresses of the users are alienated so that the calling client can no longer be assigned. The data is used to optimize the website and to ensure the security of our information technology systems. The log files with the alienated IP addresses are also evaluated for statistical purposes.

For these purposes, we see our legitimate interest in the processing of data according to Art. 6 para. 1 lit. f GDPR.

#### **4. Data deletion and storage period**

The data will be deleted as soon as it is no longer necessary for the purpose of its collection. In the case of collecting the data for providing the website, this is the case when the respective session is completed.

If the data is stored in log files, the IP addresses of the users are alienated so that it is no longer possible to assign the calling client.

#### **5. Option to object or for cancellation**

The collection of data for the provision of the website and the storage of the data in log files is essential for the operation of the website. There is consequently no contradiction on the part of the user.

### **III. Usage of Cookies**

#### **1. Scope of processing of personal data**

Our website uses cookies. Cookies are text files that are stored in the Internet browser or the Internet browser on the user's computer system. When a user visits a website, a cookie may be stored on the user's operating system. This cookie contains a characteristic string that allows the browser to be uniquely identified when the website is reopened.

We use cookies to make our website more user-friendly. Some elements of our website require that the calling browser be identified even after a page break. The cookies are used to manage the sessions.

The data of the users collected in this way are pseudonymized by technical precautions. Therefore, an assignment of the data to the calling user is no longer possible. The data will not be stored together with other personal data of the users.

#### **2. Legal basis for processing personal data**

The legal basis for the processing of personal data using cookies is Article 6 (1) lit. f GDPR.

### **3. Purpose of the data processing**

The purpose of using *technically necessary cookies* is to facilitate the use of websites for users. Some features of our website cannot be offered without the use of cookies. For these, it is necessary that the browser is recognized even after a page break.

The user data collected through *technically necessary cookies* will not be used to create user profiles.

The use of the *analysis cookies* is for the purpose of improving the quality of our website and its contents. Through the *analysis cookies*, we learn how the website is used and so we can constantly optimize our offer.

We use on our website the open source software tool Matomo (formerly PIWIK) and Google Analytics to analyze the surfing behavior of our users (for web analysis by the tools Matomo and Google Analytics see the sections below).

For these purposes, we see our legitimate interest in the processing of data according to Art. 6 para. 1 lit. f GDPR.

### **4. Data deletion and storage period; option to object or for cancellation**

Cookies are stored on the computer of the user and transmitted by this on our website. Therefore, as a user, you have full control over the use of cookies. By changing the settings in your internet browser, you can disable or restrict the transmission of cookies. Already saved cookies can be deleted at any time. This can also be done automatically. If cookies are disabled for our website, it may not be possible to use all the functions of the website to the full.

## **IV. Contact form and e-mail contact**

### **1. Scope of processing of personal data**

On our website is a contact form available, which can be used for electronic contact. If a user realizes this option, the data entered in the input mask will be transmitted to us and saved. These data include: title, first name, last name, company, e-mail, country and message.

For the processing of the data, reference is made to the privacy policy in the context of the sending.

## Information obligations according to the General Data Protection Regulation

At the time of sending the message, an e-mail containing the contents of the contact form will be sent to a central address of HDM AG, which is responsible for the internal processing of inquiries via the contact form. In addition, the date and time of the process are logged for verification purposes.

Alternatively, contact via the provided e-mail address is possible. In this case, the user's personal data transmitted by e-mail will be stored.

In this context, there is no disclosure of the data to third parties. The data is used exclusively for the processing of the conversation.

### **2. Legal basis for processing personal data**

The legal basis for the processing of the data transmitted in the course of sending an e-mail is Article 6 (1) lit. f GDPR.

### **3. Purpose of the data processing**

The processing of the personal data from the input mask serves us only to process the contact. In the case of contact via e-mail, this also includes the required legitimate interest in the processing of the data.

The time stamp stored during the sending process is used to prove the orderly dispatch and receipt.

### **4. Data deletion and storage period**

The data will be deleted as soon as it is no longer necessary for the purpose of its collection. For the personal data from the input form of the contact form and those sent by e-mail, this is the case when the respective conversation with the user has ended. The conversation is ended when it can be inferred from the circumstances that the relevant facts have been finally clarified.

### **5. Option to object or for cancellation**

The user has the possibility at any time to revoke his consent to the processing of the personal data. If the user contacts us by e-mail, he may object to the storage of his personal data at any time. In such a case, the conversation cannot continue.

The revocation of the consent and the objection to the storage can also be made via the contact form.

All personal data stored in the course of making contact will be deleted in this case.

## **V. Newsletter**

### **1. Scope of processing of personal data**

On our website you can subscribe to a free newsletter. When registering for the newsletter, the e-mail address from the input mask will be sent to us. The other input fields are optional.

In addition, for registration purposes, the date and time of registration are collected upon registration.

For the processing of the data your consent is obtained as part of the registration process and it is referred to the privacy statement.

In connection with the processing of data for the sending of newsletters, there is no disclosure of the data to third parties. The data will be used exclusively for sending the newsletter.

### **2. Legal basis for processing personal data**

The legal basis for the processing of the data after the user has registered for the newsletter is the consent of the user Art. 6 para. 1 lit. a GDPR.

### **3. Purpose of the data processing**

The collection of the user's e-mail address serves to deliver the newsletter.

The collection of other personal data in the context of the registration process serves to prevent misuse of the services or the email address used.

### **4. Data deletion and storage period**

The data will be deleted as soon as it is no longer necessary for the purpose of its collection. The e-mail address of the user is therefore stored as long as the subscription to the newsletter is active.

This also applies to the other personal data collected during the registration process.

## **5. Option to object or for cancellation**

Subscription to the newsletter may be terminated at any time by the user concerned. For this purpose, there is a corresponding link in each newsletter.

This also allows a revocation of the consent to the storage of the personal data collected during the registration process.

## **VI. Web analysis by Matomo (formerly PIWIK)**

### **1. Scope of processing of personal data**

On our website we use the open-source software tool Matomo (formerly PIWIK) to analyze the surfing behavior of our users. The software sets a cookie on the computer of the users (for cookies see section above). If individual pages of our website are called, the following data are stored:

- (1) Two bytes of the IP address of the calling system of the user
- (2) The called website
- (3) The website from which the user came to the accessed website (referrer)
- (4) The subpages that are called from the called web page
- (5) The length of stay on the website
- (6) The frequency of calling the website.

The software runs exclusively on the servers of our website. A storage of the personal data of the users takes place only there. A transfer of the data to third parties does not take place.

The software is set so that the IP addresses are not completely stored, but two bytes of the IP address is masked (eg 192.168.xxx.xxx). In this way, an assignment of the shortened IP address to the calling computer is no longer possible.

### **2. Legal basis for processing personal data**

The legal basis for processing users' personal data is Article 6 (1) lit. f GDPR.

### **3. Purpose of the data processing**

The processing of users' personal data enables us to analyze the surfing behavior of our users. By analyzing the data obtained, we are able to compile information about the use of the individual components of our website. This helps us to constantly improve our

website and its user-friendliness. For these purposes, our legitimate interest lies in the processing of the data according to Art. 6 para. 1 lit. f GDPR.

The anonymisation of the IP address sufficiently takes into account the interest of users in their protection of personal data.

#### **4. Data deletion and storage period**

The anonymized data will not be deleted because it will continue to be needed for our recording purposes, in particular for statistical analysis.

#### **5. Option to object or for cancellation**

Cookies are stored on the computer of the user and transmitted by this on our side. Therefore, as a user, you have full control over the use of cookies. By changing the settings in your internet browser, you can disable or restrict the transmission of cookies. Already saved cookies can be deleted at any time. This can also be done automatically. If cookies are disabled for our website, it may not be possible to use all the functions of the website to the full.

We offer our users the option of opting out of the analysis process in the privacy policy of our website.

For more information on the privacy settings of the Matomo software, please see the following link: <https://matomo.org/docs/privacy/>.

### **VII. Web analysis by Google Analytics**

#### **1. Scope of processing of personal data**

We use Google Analytics, a web analytics service provided by Google Inc., 1600 Amphitheater Parkway, Mountain View, CA 94043 USA, hereafter 'Google'. Google Analytics uses so-called 'cookies' (for cookies, see section above), text files that are stored on your computer and thereby allow an analysis of the use of the website by you. The information generated by these cookies, such as the time, location and frequency of your website visit, including your IP address, is transmitted to Google in the United States and stored there.

Google will use this information to evaluate your use of our site, to compile reports on our website activity, and to provide other services related to website activity and internet usage.



## Information obligations according to the General Data Protection Regulation

Google wants to use this information to evaluate your use of our site, to compile reports on our site activity, and to provide other services related to website activity and internet usage

Google does not claim to link your IP address to any other data provided by Google.

We use Google Analytics on our website with the addition "\_gat.\_anonymizeIp". In this case, your IP address will already be shortened and thus anonymised by Google within member states of the European Union or in other contracting states of the Agreement on the European Economic Area.

### **2. Legal basis for processing personal data**

The legal basis for processing users' personal data is Article 6 (1) lit. f GDPR.

### **3. Purpose of the data processing**

The processing of users' personal data enables us to analyze the surfing behavior of our users. By analyzing the data obtained, we are able to compile information about the use of the individual components of our website. This helps us to constantly improve our website and its user-friendliness. For these purposes, our legitimate interest lies in the processing of the data according to Art. 6 para. 1 lit. f GDPR.

The anonymisation of the IP address sufficiently takes into account the interest of users in their protection of personal data.

### **4. Data deletion and storage period**

The anonymized data will not be deleted because it will continue to be needed for our recording purposes, in particular for statistical analysis.

### **5. Option to object or for cancellation**

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

We offer our users the option of opting out of the analysis process in the privacy policy of our website.

## Information obligations according to the General Data Protection Regulation

In addition, Google offers a deactivation add-on for the most popular browsers, giving you more control over what Google collects about the sites you visit. The add-on informs the JavaScript (ga.js) of Google Analytics that no website visit information should be transmitted to Google Analytics. However, the Google Analytics Disable Add-on does not prevent information from being transmitted to us or any other web analytics services we may use. Further information on the installation of the browser add-on is available via the following link: <https://tools.google.com/dlpage/gaoptout?hl=de>

On this website Google Analytics is employed with the software extension “gat.\_anonymizeIp();” that processes the IP addresses only in a truncated and anonymized form.

If you have consented to Google linking your web and app browsing history to your Google Account and using information from your Google Account to personalize your ads, Google will use your data with Google Analytics data to provide audience lists for create cross-device remarketing. To do this, Google Analytics will initially track your Google-authenticated ID associated with your Google Account (that is, personally identifiable information) on our website. Afterwards, Google Analytics will temporarily link your ID with your Google Analytics data to optimize our audiences. If you do not agree, you can opt-out of this through the "My Account" section of your Google Account.

Google Analytics Terms of Service and Privacy can be found under <http://www.google.com/analytics/terms/de.html>

and

<http://www.google.com/intl/de/analytics/privacyoverview.html>

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

If your personal data are processed, you are 'data subject' according to the General Data Protection Regulation (GDPR) and you have the following rights to the controller:

### **1. Right to information**

You may ask the controller to confirm if personal data concerning you is processed by us.

### **2. Right to rectification**

You have a right to rectification and / or completion to the controller, if the personal data you process is incorrect or incomplete. The controller must make the correction without delay.

### **3. Right to restriction of processing**

You may require the restriction of the processing of personal data concerning you, if one of the conditions in Art. 18 GDPR exists.

### **4. Right to erasure**

You may require the controller to delete the personal data relating to you immediately and the controller is obliged to delete this data immediately if one of the reasons under Art. 17 GDPR applies.

### **5. Notification obligation**

If you have the right of rectification, restriction of processing or erasure to the controller, he / she is obliged to notify all recipients to whom your personal data have been disclosed of this correction or deletion of the data or restriction of processing, unless: this proves to be impossible or involves a disproportionate effort.

You have a right to the controller to be informed about these recipients.

### **6. Right to data portability**

You have the right to receive the personal data relating to you provided to the controller in a structured, common and machine-readable format. In addition, you have the right to transfer this data to another person without hindrance by the controller, provided that

- (1) the processing on a consent acc. Art. 6 para. 1 lit. a GDPR or Art. 9 para. 2 lit. a GDPR or on a contract acc. Art. 6 para. 1 lit. b GDPR is based and
- (2) the processing is done by automated means.

## **7. Right to object**

You have the right at any time, for reasons that arise from your particular situation, against the processing of your personal data, which pursuant to Art. 6 para. 1 lit. e or f DSGVO takes an objection; this also applies to a profiling based on these provisions.

As a result, the controller will no longer process the personal data concerning you unless he can demonstrate compelling legitimate grounds for processing that outweigh your interests, rights and freedoms, or the processing is for the purpose of enforcing, exercising or defending of legal claims.

If the personal data relating to you are processed for direct marketing purposes, you have the right to object at any time to the processing of your personal data for the purpose of such advertising; this also applies to profiling insofar as it is associated with such direct mail. If you object to processing for direct marketing purposes, your personal data will no longer be processed for these purposes.

Regardless of Directive 2002/58 / EC, you have the option - in the context of the use of information society services- of exercising your right to object through automated procedures that use technical specifications.

## **8. Right to revoke a declaration of consent under data protection law**

You have the right to revoke your declaration of consent under data protection law at any time. The revocation of consent does not affect the legality of the processing carried out on the basis of the consent until the revocation.

## **9. Right to complain to a supervisory authority**

Without prejudice to any other administrative or judicial remedy, you shall have the right to complain to a supervisory authority, in particular in the Member State of its place of residence, place of work or place of alleged infringement, if you believe that the processing of your personal data relates to you Data violates the GDPR.

The supervisory authority to which the complaint has been submitted shall inform the complainant of the status and results of the complaint, including the possibility of a judicial remedy pursuant to Article 78 of the GDPR.