

Privacy Policy

This privacy policy applies to **visitors to our websites**, to our **social media presence** and to the **general handling of the data of our applicants, business partners and interested parties**.

1. An overview of data protection

General information

The following information will provide you with an easy to navigate overview of what will happen with your personal data when you visit this website. The term “personal data” comprises all data that can be used to personally identify you. For detailed information about the subject matter of data protection, please consult our Data Protection Declaration, which we have included beneath this copy.

Data recording on this website

Who is the responsible party for the recording of data on this website (i.e., the “controller”)?

The data on this website is processed by the operator of the website, whose contact information is available under section “Information about the responsible party (referred to as the “controller” in the GDPR)” in this Privacy Policy.

How do we record your data?

We collect your data as a result of your sharing of your data with us. This may, for instance be information you enter into our contact form.

Other data shall be recorded by our IT systems automatically or after you consent to its recording during your website visit. This data comprises primarily technical information (e.g., web browser, operating system, or time the site was accessed). This information is recorded automatically when you access this website.

What are the purposes we use your data for?

A portion of the information is generated to guarantee the error free provision of the website. Other data may be used to analyze your user patterns. If contracts can be concluded or initiated via the website, the transmitted data will also be processed for contract offers, orders or other order enquiries

What rights do you have as far as your information is concerned?

You have the right to receive information about the source, recipients, and purposes of your archived personal data at any time without having to pay a fee for such disclosures. You also have the right to demand that your data are rectified or eradicated. If you have consented to data processing, you have the option to revoke this consent at any time, which shall affect all future data processing. Moreover, you have the right to demand that the processing of your data be restricted under certain circumstances. Furthermore, you have the right to log a complaint with the competent supervising agency.

Please do not hesitate to contact us at any time if you have questions about this or any other data protection related issues.

Analysis tools and tools provided by third parties

There is a possibility that your browsing patterns will be statistically analyzed when you visit this website. Such analyses are performed primarily with what we refer to as analysis programs.

For detailed information about these analysis programs please consult our Data Protection Declaration below.

2. Hosting

We are hosting the content of our website at the following providers:

Amazon Web Services (AWS)

The provider is the Amazon Web Services EMEA SARL, 38 Avenue John F. Kennedy, 1855 Luxembourg (hereinafter referred to as "AWS").

When you visit our website, your personal data will be processed on AWS servers. This may also result in the transfer of personal data to the parent company of AWS in the United States. The transfer of data to the US is based on the EU's standard contractual clauses. For details please consult:

<https://aws.amazon.com/de/blogs/security/aws-gdpr-data-processing-addendum/>.

For more information, please see the AWS Data Privacy Policy:

https://aws.amazon.com/de/privacy/?nc1=f_pr.

AWS is used on the basis of Art. 6(1)(f) GDPR. We have a legitimate interest in a depiction of our website that is as reliable as possible. If appropriate consent has been obtained, the processing is carried out

exclusively on the basis of Art. 6(1)(a) GDPR and § 25 (1) TDDDG, insofar the consent includes the storage of

cookies or the access to information in the user's end device (e.g., device fingerprinting) within the meaning of the TDDDG. This consent can be revoked at any time.

The company is certified in accordance with the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link:

<https://www.dataprivacyframework.gov/participant/5776>.

3. General information and mandatory information

Data protection

The operators of this website and its pages take the protection of your personal data very seriously. Hence, we handle your personal data as confidential information and in compliance with the statutory data protection regulations and this Data Protection Declaration.

Whenever you use this website, a variety of personal information will be collected. Personal data comprises data that can be used to personally identify you. This Data Protection Declaration explains which data we collect as well as the purposes we use this data for. It also explains how, and for which purpose the information is collected.

We herewith advise you that the transmission of data via the Internet (i.e., through e-mail communications) may be prone to security gaps. It is not possible to completely protect data against third-party access.

Information about the responsible party (referred to as the “controller” in the GDPR)

The data processing controller on this website is

Hotel Am Schlossberg GmbH & Co. KG

Europastraße 13

72622 Nürtingen

Phone: +49-7022-704-0

E-Mail: info@schlossberg.bestwestern.de

The controller is the natural person or legal entity that single-handedly or jointly with others makes decisions as to the purposes of and resources for the processing of personal data (e.g., names, e-mail addresses, etc.).

Storage duration

Unless a more specific storage period has been specified in this privacy policy, your personal data will remain with us until the purpose for which it was collected no longer applies. If you assert a justified request for deletion or revoke your consent to data processing, your data will be deleted, unless we have other legally permissible reasons for storing your personal data (e.g., tax or commercial law retention periods); in the latter case, the deletion will take place after these reasons cease to apply.

General information on the legal basis for the data processing on this website

If you have consented to data processing, we process your personal data on the basis of Art. 6(1)(a) GDPR or Art. 9 (2)(a) GDPR, if special categories of data are processed according to Art. 9 (1) DSGVO. In the case of explicit consent to the transfer of personal data to third countries, the data processing is also based on Art. 49 (1)(a) GDPR. If you have consented to the storage of cookies or to the access to information in your end device (e.g., via device fingerprinting), the data processing is additionally based on § 25 (1) TDDDG. The consent can be revoked at any time. If your data is required for the fulfillment of a contract or for the implementation of pre-contractual measures, we process your data on the basis of Art. 6(1)(b) GDPR. Furthermore, if your data is required for the fulfillment of a legal obligation, we process it on the basis of Art. 6(1)(c) GDPR. Furthermore, the data processing may be carried out on the basis of our legitimate interest according to Art. 6(1)(f) GDPR. Information on the relevant legal basis in each individual case is provided in the following paragraphs of this privacy policy.

Designation of a data protection officer

We have appointed a data protection officer.

Edmund Hilt

hilt evolution

Nelkenstraße 36

71272 Renningen

E-Mail: [datenschutz\(at\)hilt-evolution.com](mailto:datenschutz(at)hilt-evolution.com)

Web: www.hilt-evolution.com

Recipients of personal data

In the scope of our business activities, we cooperate with various external parties. In some cases, this also requires the transfer of personal data to these external parties. We only disclose personal data to external parties if this is required as part of the fulfillment of a contract, if we are legally obligated to do so (e.g., disclosure of data to tax authorities), if we have a legitimate interest in the disclosure pursuant to Art. 6 (1)(f) GDPR, or if another legal basis permits the disclosure of this data. When using processors, we only disclose personal data of our customers on the basis of a valid contract on data processing. In the case of joint processing, a joint processing agreement is concluded.

Revocation of your consent to the processing of data

A wide range of data processing transactions are possible only subject to your express consent. You can also revoke at any time any consent you have already given us. This shall be without prejudice to the lawfulness of any data collection that occurred prior to your revocation.

Right to object to the collection of data in special cases; right to object to direct advertising (Art. 21 GDPR)

IN THE EVENT THAT DATA ARE PROCESSED ON THE BASIS OF ART. 6(1)(E) OR (F) GDPR, YOU HAVE THE RIGHT TO AT ANY TIME OBJECT TO THE PROCESSING OF YOUR PERSONAL DATA BASED ON GROUNDS ARISING FROM YOUR UNIQUE SITUATION. THIS ALSO APPLIES TO ANY PROFILING BASED ON THESE PROVISIONS. TO DETERMINE THE LEGAL BASIS, ON WHICH ANY PROCESSING OF DATA IS BASED, PLEASE CONSULT THIS DATA PROTECTION DECLARATION. IF YOU LOG AN OBJECTION, WE WILL NO LONGER PROCESS YOUR AFFECTED PERSONAL DATA, UNLESS WE ARE IN A POSITION TO PRESENT COMPELLING PROTECTION WORTHY GROUNDS FOR THE PROCESSING OF YOUR DATA, THAT OUTWEIGH YOUR INTERESTS, RIGHTS AND FREEDOMS OR IF THE PURPOSE OF THE PROCESSING IS THE CLAIMING, EXERCISING OR DEFENCE OF LEGAL ENTITLEMENTS (OBJECTION PURSUANT TO ART. 21(1) GDPR). IF YOUR PERSONAL DATA IS BEING PROCESSED IN ORDER TO ENGAGE IN DIRECT ADVERTISING, YOU HAVE THE RIGHT TO OBJECT TO THE PROCESSING OF YOUR AFFECTED PERSONAL DATA FOR THE PURPOSES OF SUCH ADVERTISING AT ANY TIME. THIS ALSO APPLIES TO PROFILING TO THE EXTENT THAT IT IS AFFILIATED WITH SUCH DIRECT ADVERTISING. IF YOU OBJECT, YOUR PERSONAL DATA WILL SUBSEQUENTLY NO LONGER BE USED FOR DIRECT ADVERTISING PURPOSES (OBJECTION PURSUANT TO ART. 21(2) GDPR).

Right to log a complaint with the competent supervisory agency

In the event of violations of the GDPR, data subjects are entitled to log a complaint with a supervisory agency, in particular in the member state where they usually maintain their domicile, place of work or at the place where the alleged violation occurred. The right to log a complaint is in effect regardless of any other administrative or court proceedings available as legal recourses.

Right to data portability

You have the right to have data that we process automatically on the basis of your consent or in fulfillment of a contract handed over to you or to a third party in a common, machine-readable format. If you should demand the direct transfer of the data to another controller, this will be done only if it is technically feasible.

Information about, rectification and eradication of data

Within the scope of the applicable statutory provisions, you have the right to demand information about your archived personal data, their source and recipients as well as the purpose of the processing of your data at any time. You may also have a right to have your data rectified or eradicated. If you have questions about this subject matter or any other questions about personal data, please do not hesitate to contact us at any time.

Right to demand processing restrictions

You have the right to demand the imposition of restrictions as far as the processing of your personal data is concerned. To do so, you may contact us at any time. The right to demand restriction of processing applies in the following cases:

- In the event that you should dispute the correctness of your data archived by us, we will usually need some time to verify this claim. During the time that this investigation is ongoing, you have the right to demand that we restrict the processing of your personal data.
- If the processing of your personal data was/is conducted in an unlawful manner, you have the option to demand the restriction of the processing of your data instead of demanding the eradication of this data.
- If we do not need your personal data any longer and you need it to exercise, defend or claim legal entitlements, you have the right to demand the restriction of the processing of your personal data instead of its eradication.
- If you have raised an objection pursuant to Art. 21(1) GDPR, your rights and our rights will have to be weighed against each other. As long as it has not been determined whose interests prevail, you have the right to demand a restriction of the processing of your personal data.

If you have restricted the processing of your personal data, these data – with the exception of their archiving – may be processed only subject to your consent or to claim, exercise or defend legal entitlements or to protect the rights of other natural persons or legal entities or for important public interest reasons cited by the European Union or a member state of the EU.

SSL and/or TLS encryption

For security reasons and to protect the transmission of confidential content, such as purchase orders or inquiries you submit to us as the website operator, this website uses either an SSL or a TLS encryption program. You can recognize an encrypted connection by checking whether the address line of the browser switches from “http://” to “https://” and also by the appearance of the lock icon in the browser line.

If the SSL or TLS encryption is activated, data you transmit to us cannot be read by third parties.

4. Recording of data on this website

Cookies

Our websites and pages use what the industry refers to as “cookies.” Cookies are small data packages that do not cause any damage to your device. They are either stored temporarily for the duration of a session (session cookies) or they are permanently archived on your device (permanent cookies). Session cookies are automatically deleted once you terminate your visit. Permanent cookies remain archived on your device until you actively delete them, or they are automatically eradicated by your web browser.

Cookies can be issued by us (first-party cookies) or by third-party companies (so-called third-party cookies). Third-party cookies enable the integration of certain services of third-party companies into websites (e.g., cookies for handling payment services).

Cookies have a variety of functions. Many cookies are technically essential since certain website functions would not work in the absence of these cookies (e.g., the shopping cart function or the display of videos). Other cookies may be used to analyze user behavior or for promotional purposes.

Cookies, which are required for the performance of electronic communication transactions, for the provision of certain functions you want to use (e.g., for the shopping cart function) or those that are necessary for the optimization (required cookies) of the website (e.g., cookies that provide measurable insights into the web audience), shall be stored on the basis of Art. 6(1)(f) GDPR, unless a different legal basis is cited. The operator of the website has a legitimate interest in the storage of required cookies to ensure the technically error-free and optimized provision of the operator's services. If your consent to the storage of the cookies

and similar recognition technologies has been requested, the processing occurs exclusively on the basis of the consent obtained (Art. 6(1)(a) GDPR and § 25 (1) TDDDG); this consent may be revoked at any time.

You have the option to set up your browser in such a manner that you will be notified any time cookies are placed and to permit the acceptance of cookies only in specific cases. You may also exclude the acceptance of cookies in certain cases or in general or activate the delete-function for the automatic eradication of cookies when the browser closes. If cookies are deactivated, the functions of this website may be limited.

Which cookies and services are used on this website can be found in this privacy policy.

Consent with ConsentManager

Our website uses consent management technology to obtain your consent to store certain cookies on your device or to use certain technologies and to document this in accordance with data protection regulations.

Our consent management tool stores a cookie in your browser in order to be able to assign the consents you have given or their revocation. The data collected in this way is stored until you request its deletion, delete the consent manager cookie itself, or the purpose for data storage no longer applies.

Mandatory statutory retention obligations remain unaffected.

The consent management technology is used to obtain the legally required consent for the use of cookies. The legal basis for this is Art. 6(1)(c) GDPR.

Server log files

The provider of this website and its pages automatically collects and stores information in so-called server log files, which your browser communicates to us automatically. The information comprises:

- The type and version of browser used
- The used operating system
- Referrer URL
- The hostname of the accessing computer
- The time of the server inquiry
- The IP address

This data is not merged with other data sources.

This data is recorded on the basis of Art. 6(1)(f) GDPR. The operator of the website has a legitimate interest in the technically error free depiction and the optimization of the operator's website. In order to achieve this, server log files must be recorded.

Contact form

If you submit inquiries to us via our contact form, the information provided in the contact form as well as any contact information provided therein will be stored by us in order to handle your inquiry and in the event that we have further questions. We will not share this information without your consent.

The processing of these data is based on Art. 6(1)(b) GDPR, if your request is related to the execution of a contract or if it is necessary to carry out pre-contractual measures. In all other cases the processing is based on our legitimate interest in the effective processing of the requests addressed to us (Art. 6(1)(f) GDPR) or on your agreement (Art. 6(1)(a) GDPR) if this has been requested; the consent can be revoked at any time.

The information you have entered into the contact form shall remain with us until you ask us to eradicate the data, revoke your consent to the archiving of data or if the purpose for which the information is being archived no longer exists (e.g., after we have concluded our response to your inquiry). This shall be without prejudice to any mandatory legal provisions, in particular retention periods.

Request by e-mail, telephone, or fax

If you contact us by e-mail, telephone or fax, your request, including all resulting personal data (name, request) will be stored and processed by us for the purpose of processing your request. We do not pass these data on without your consent.

These data are processed on the basis of Art. 6(1)(b) GDPR if your inquiry is related to the fulfillment of a contract or is required for the performance of pre-contractual measures. In all other cases, the data are processed on the basis of our legitimate interest in the effective handling of inquiries submitted to us (Art. 6(1)(f) GDPR) or on the basis of your consent (Art. 6(1)(a) GDPR) if it has been obtained; the consent can be revoked at any time.

The data sent by you to us via contact requests remain with us until you request us to delete, revoke your consent to the storage or the purpose for the data storage lapses (e.g. after completion of your request). Mandatory statutory provisions - in particular statutory retention periods - remain unaffected.

5. Social media

Data processing through social networks

We maintain publicly available profiles in social networks. The individual social networks we use can be found below. Social networks such as Facebook, X etc. can generally analyze your user behavior comprehensively if you visit their website or a website with integrated social media content (e.g., like buttons or banner ads). When you visit our social media pages, numerous data protection-relevant processing operations are triggered. In detail:

If you are logged in to your social media account and visit our social media page, the operator of the social media portal can assign this visit to your user account. Under certain circumstances, your personal data may also be recorded if you are not logged in or do not have an account with the respective social media portal. In this case, this data is collected, for example, via cookies stored on your device or by recording your IP address.

Using the data collected in this way, the operators of the social media portals can create user profiles in which their preferences and interests are stored. This way you can see interest-based advertising inside and outside of your social media presence. If you have an account with the social network, interest-based advertising can be displayed on any device you are logged in to or have logged in to.

Please also note that we cannot retrace all processing operations on the social media portals. Depending on the provider, additional processing operations may therefore be carried out by the operators of the social media portals. Details can be found in the terms of use and privacy policy of the respective social media portals.

Legal basis

Our social media appearances should ensure the widest possible presence on the Internet. This is a legitimate interest within the meaning of Art. 6 (1) lit. f GDPR. The analysis processes initiated by the social networks may be based on divergent legal bases to be specified by the operators of the social networks (e.g., consent within the meaning of Art. 6 (1) (a) GDPR).

Responsibility and assertion of rights

If you visit one of our social media sites (e.g., Facebook), we, together with the operator of the social media platform, are responsible for the data processing operations triggered during this visit. You can in principle protect your rights (information, correction, deletion, limitation of processing, data portability and complaint) vis-à-vis us as well as vis-à-vis the operator of the respective social media portal (e.g., Facebook).

Please note that despite the shared responsibility with the social media portal operators, we do not have full influence on the data processing operations of the social media portals. Our options are determined by the company policy of the respective provider.

Storage time

The data collected directly from us via the social media presence will be deleted from our systems as soon as you ask us to delete it, you revoke your consent to the storage or the purpose for the data storage lapses. Stored cookies remain on your device until you delete them. Mandatory statutory provisions - in particular, retention periods - remain unaffected.

We have no control over the storage duration of your data that are stored by the social network operators for their own purposes. For details, please contact the social network operators directly (e.g., in their privacy policy, see below).

Your rights

You have the right to receive information about the origin, recipient and purpose of your stored personal data at any time and free of charge. You also have the right to object, the right to data portability and the right to file a complaint with the responsible regulatory agency. Furthermore, you can request the correction, blocking, deletion and, under certain circumstances, the restriction of the processing of your personal data.

Individual social networks

Facebook

We have a profile on Facebook. The provider of this service is Meta Platforms Ireland Limited, Merrion Road, Dublin 4, D04 X2K5, Ireland (hereinafter Meta). According to Meta's statement the collected data will also be transferred to the USA and to other third-party countries.

We have signed an agreement with Meta on shared responsibility for the processing of data (Controller Addendum). This agreement determines which data processing operations we or Meta are responsible for when you visit our Facebook Fanpage. This agreement can be viewed at the following link:

https://www.facebook.com/legal/terms/page_controller_addendum.

You can customize your advertising settings independently in your user account. Click on the following link and log in:

<https://www.facebook.com/settings?tab=ads>.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here:

https://www.facebook.com/legal/EU_data_transfer_addendum and

<https://de-de.facebook.com/help/566994660333381>.

Details can be found in the Facebook privacy policy:

<https://www.facebook.com/about/privacy/>.

The company is certified in accordance with the “EU-US Data Privacy Framework” (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link:

<https://www.dataprivacyframework.gov/participant/4452>

Instagram

We have a profile on Instagram. The provider of this service is Meta Platforms Ireland Limited, Merrion Road, Dublin 4, D04 X2K5, Ireland.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here:

https://www.facebook.com/legal/EU_data_transfer_addendum and

<https://de-de.facebook.com/help/566994660333381>.

For details on how they handle your personal information, see the Instagram Privacy Policy:

<https://privacycenter.instagram.com/policy/>.

The company is certified in accordance with the “EU-US Data Privacy Framework” (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link:

<https://www.dataprivacyframework.gov/participant/4452>

LinkedIn

We have a LinkedIn profile. The provider is the LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland. LinkedIn uses advertising cookies.

If you want to disable LinkedIn advertising cookies, please use the following link:

<https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here:

<https://www.linkedin.com/legal/l/dpa> and

<https://www.linkedin.com/legal/l/eu-sccs>.

For details on how they handle your personal information, please refer to LinkedIn's privacy policy:

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

The company is certified in accordance with the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link:

<https://www.dataprivacyframework.gov/participant/5448>

6. Analysis tools and advertising

Google Tag Manager

We use the Google Tag Manager. The provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

The Google Tag Manager is a tool that allows us to integrate tracking or statistical tools and other technologies on our website. The Google Tag Manager itself does not create any user profiles, does not store cookies, and does not carry out any independent analyses. It only manages and runs the tools integrated via it. However, the Google Tag Manager does collect your IP address, which may also be transferred to Google's parent company in the United States.

The Google Tag Manager is used on the basis of Art. 6(1)(f) GDPR. The website operator has a legitimate interest in the quick and uncomplicated integration and administration of various tools on his website. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6(1)(a) GDPR and § 25 (1) TDDD, insofar the consent includes the storage of cookies or the access to information in the user's end device (e.g., device fingerprinting) within the meaning of the TDDD. This consent can be revoked at any time.

The company is certified in accordance with the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link:

<https://www.dataprivacyframework.gov/participant/5780>.

Google Analytics

This website uses functions of the web analysis service Google Analytics. The provider of this service is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

Google Analytics enables the website operator to analyze the behavior patterns of website visitors. To that end, the website operator receives a variety of user data, such as pages accessed, time spent on the page, the utilized operating system and the user's origin. This data is assigned to the respective end device of the user. An assignment to a user-ID does not take place.

Furthermore, Google Analytics allows us to record your mouse and scroll movements and clicks, among other things. Google Analytics uses various modeling approaches to augment the collected data sets and uses machine learning technologies in data analysis.

Google Analytics uses technologies that make the recognition of the user for the purpose of analyzing the user behavior patterns (e.g., cookies or device fingerprinting). The website use information recorded by Google is, as a rule transferred to a Google server in the United States, where it is stored.

The use of these services occurs on the basis of your consent pursuant to Art. 6(1)(a) GDPR and § 25(1) TDDDG. You may revoke your consent at any time.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here:

<https://business.safety.google/adcontrollerterms/sccs/>.

The company is certified in accordance with the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link:

<https://www.dataprivacyframework.gov/participant/5780>.

IP anonymization

Google Analytics IP anonymization is active. As a result, your IP address will be abbreviated by Google within the member states of the European Union or in other states that have ratified the Convention on the European Economic Area prior to its transmission to the United States. The full IP address will be transmitted to one of Google's servers in the United States and abbreviated there only in exceptional cases.

On behalf of the operator of this website, Google shall use this information to analyze your use of this website to generate reports on website activities and to render other services to the operator of this website that are related to the use of the website and the Internet. The IP address transmitted in conjunction with Google Analytics from your browser shall not be merged with other data in Google's possession.

Browser plug-in

You can prevent the recording and processing of your data by Google by downloading and installing the browser plugin available under the following link:

<https://tools.google.com/dlpage/gaoptout?hl=en>.

For more information about the handling of user data by Google Analytics, please consult Google's Data Privacy Declaration at:

<https://support.google.com/analytics/answer/6004245?hl=en>.

Google Ads

The website operator uses Google Ads. Google Ads is an online promotional program of Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

Google Ads enables us to display ads in the Google search engine or on third-party websites, if the user enters certain search terms into Google (keyword targeting). It is also possible to place targeted ads based on the user data Google has in its possession (e.g., location data and interests; target group targeting). As the website operator, we can analyze these data quantitatively, for instance by analyzing which search terms resulted in the display of our ads and how many ads led to respective clicks.

The use of these services occurs on the basis of your consent pursuant to Art. 6(1)(a) GDPR and § 25(1) TDDDG. You may revoke your consent at any time.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here:

<https://policies.google.com/privacy/frameworks> and

<https://business.safety.google/controllerterms/>.

The company is certified in accordance with the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link:

<https://www.dataprivacyframework.gov/participant/5780>.

Google Ads Remarketing

This website uses the functions of Google Ads Remarketing. The provider of these solutions is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

With Google Ads Remarketing, we can assign people who interact with our online offering to specific target groups in order to subsequently display interest-based advertising to them in the Google advertising network (remarketing or retargeting).

Moreover, it is possible to link the advertising target groups generated with Google Ads Remarketing to device encompassing functions of Google. This makes it possible to display interest-based customized advertising messages, depending on your prior usage and browsing patterns on a device (e.g., cell phone) in a manner tailored to you as well as on any of your devices (e.g., tablet or PC).

If you have a Google account, you have the option to object to personalized advertising under the following link:

<https://adssettings.google.com/anonymous?hl=de>.

The use of these services occurs on the basis of your consent pursuant to Art. 6(1)(a) GDPR and § 25(1) TDDDG. You may revoke your consent at any time.

For further information and the pertinent data protection regulations, please consult the Data Privacy Policies of Google at:

<https://policies.google.com/technologies/ads?hl=en>.

The company is certified in accordance with the “EU-US Data Privacy Framework” (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link:

<https://www.dataprivacyframework.gov/participant/5780>.

7. Newsletter

Newsletter data

If you would like to subscribe to the newsletter offered on this website, we will need from you an e-mail address as well as information that allow us to verify that you are the owner of the e-mail address provided and consent to the receipt of the newsletter. No further data shall be collected or shall be collected only on a voluntary basis. We shall use such data only for the sending of the requested information and shall not share such data with any third parties.

The processing of the information entered into the newsletter subscription form shall occur exclusively on the basis of your consent (Art. 6(1)(a) GDPR). You may revoke the consent you have given to the archiving of data, the e-mail address, and the use of this information for the sending of the newsletter at any time, for instance by clicking on the “Unsubscribe” link in the newsletter. This shall be without prejudice to the lawfulness of any data processing transactions that have taken place to date.

The data deposited with us for the purpose of subscribing to the newsletter will be stored by us until you unsubscribe from the newsletter or the newsletter service provider and deleted from the newsletter distribution list after you unsubscribe from the newsletter or after the purpose has ceased to apply. We reserve the right to delete or block e-mail addresses from our newsletter distribution list at our own discretion within the scope of our legitimate interest in accordance with Art. 6(1)(f) GDPR.

Data stored for other purposes with us remain unaffected.

After you unsubscribe from the newsletter distribution list, your e-mail address may be stored by us or the newsletter service provider in a blacklist, if such action is necessary to prevent future mailings. The data from the blacklist is used only for this purpose and not merged with other data. This serves both your interest and our interest in complying with the legal requirements when sending newsletters (legitimate interest within the meaning of Art. 6(1)(f) GDPR). The storage in the blacklist is indefinite. **You may object to the storage if your interests outweigh our legitimate interest.**

8. Plug-ins and Tools

Use of Hijiffy (chat and messaging service)

We use the Hijiffy service on our website, a chat and messaging service provided by Hijiffy S.A., a Portuguese company based at Rua das Eiras, No. 5, Lote 14, 1º Dtº 7960-262 Vidigueira, Portugal

(<https://www.hijiffy.com/>).

HiJiffy enables us to respond efficiently to user enquiries via various communication channels (e.g. website chat, messaging services) and to improve our customer service.

When using the chat service, the following personal data in particular may be processed:

- Communication content (e.g. chat messages)
- Communication metadata (e.g. time, duration)
- Technical data (e.g. IP address, browser information)
- Any other data that you voluntarily provide in the chat

The data is processed for the purpose of handling your enquiry and optimising our customer service. The legal basis for the processing is Art. 6(1)(f) GDPR (legitimate interest in efficient customer communication). If the communication is aimed at concluding or executing a contract, Art. 6 (1) lit. b GDPR also applies.

HiJiffy processes the data as a processor. A contract for order processing in accordance with Art. 28 GDPR has been concluded with the provider. Data processing takes place within the European Union or the European Economic Area. If, in exceptional cases, data is transferred to third countries, HiJiffy ensures an adequate level of data protection through appropriate safeguards (e.g. EU standard contractual clauses).

The data will only be stored for as long as is necessary to process the enquiry or as long as there are legal retention obligations.

Further information on data processing by HiJiffy can be found in the provider's privacy policy at:

www.hijiffy.com/privacy-policy.

Use of digi-access (Digital accessibility tool)

We use the digi-access service on our website to ensure digital accessibility and improve the accessibility of our content for people with disabilities. The service enables us to provide features such as screen reader support, keyboard navigation and other tools for accessible browsing. The service is provided by digi-access GmbH, Germany (<https://www.digiaccess.org/>).

The following personal data may be processed in connection with the use of digi-access:

- Technical data of the device (e.g. operating system, browser type)
- Metadata on the use of accessibility features (e.g. which aids have been activated)
- Any information voluntarily provided in connection with accessibility features

Purpose of processing:

The data is used exclusively to ensure the accessibility of our website and to improve the user experience for people with disabilities. The data is not analysed or passed on for advertising or profiling purposes.

Legal basis:

Processing is carried out on the basis of Art. 6(1)(f) GDPR (legitimate interest in providing barrier-free access to our content). Insofar as personal data is processed in the context of voluntary registration or contact, Art. 6(1)(a) GDPR (consent) may also apply.

Data processing:

digi·access processes the data as a data processor. A contract for data processing has been concluded in accordance with Art. 28 GDPR. Processing takes place within the EU or the European Economic Area. No data is transferred to third countries.

Storage period:

Personal data will only be stored for as long as is necessary to provide accessible functions or as required by statutory retention obligations. It will then be deleted or anonymised.

Further information on data processing by digi·access can be found in the provider's privacy policy at:

<https://www.digiaccess.org/en/privacy-policy/>

9. Online-based Audio and Video Conferences (Conference tools)

Data processing

We use online conference tools, among other things, for communication with our customers. The tools we use are listed in detail below. If you communicate with us by video or audio conference using the Internet, your personal data will be collected and processed by the provider of the respective conference tool and by us. The conferencing tools collect all information that you provide/access to use the tools (email address and/or your phone number). Furthermore, the conference tools process the duration of the conference, start and end (time) of participation in the conference, number of participants and other "context information" related to the communication process (metadata).

Furthermore, the provider of the tool processes all the technical data required for the processing of the online communication. This includes, in particular, IP addresses, MAC addresses, device IDs, device type, operating system type and version, client version, camera type, microphone or loudspeaker and the type of connection.

Should content be exchanged, uploaded, or otherwise made available within the tool, it is also stored on the servers of the tool provider. Such content includes, but is not limited to, cloud recordings, chat/ instant messages, voicemail uploaded photos and videos, files, whiteboards, and other information shared while using the service.

Please note that we do not have complete influence on the data processing procedures of the tools used. Our possibilities are largely determined by the corporate policy of the respective provider. Further information on data processing by the conference tools can be found in the data protection declarations of the tools used, and which we have listed below this text.

Purpose and legal bases

The conference tools are used to communicate with prospective or existing contractual partners or to offer certain services to our customers (Art. 6(1)(b) GDPR). Furthermore, the use of the tools serves to generally simplify and accelerate communication with us or our company (legitimate interest in the meaning of Art.

6(1)(f) GDPR). Insofar as consent has been requested, the tools in question will be used on the basis of this consent; the consent may be revoked at any time with effect from that date.

Duration of storage

Data collected directly by us via the video and conference tools will be deleted from our systems immediately after you request us to delete it, revoke your consent to storage, or the reason for storing the data no longer applies. Stored cookies remain on your end device until you delete them. Mandatory legal retention periods remain unaffected.

We have no influence on the duration of storage of your data that is stored by the operators of the conference tools for their own purposes. For details, please directly contact the operators of the conference tools.

Conference tools used

We employ the following conference tools:

Microsoft Teams

We use Microsoft Teams. The provider is the Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland. For details on data processing, please refer to the Microsoft Teams privacy policy:

<https://privacy.microsoft.com/en-us/privacystatement>.

The company is certified in accordance with the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link:

<https://www.dataprivacyframework.gov/participant/6474>.

10. Custom Services

10.1 Handling applicant data

We offer website visitors the opportunity to submit job applications to us (e.g., via e-mail, via postal services on by submitting the online job application form). Below, we will brief you on the scope, purpose and use of the personal data collected from you in conjunction with the application process. We assure you that the collection, processing, and use of your data will occur in compliance with the applicable data privacy rights and all other statutory provisions and that your data will always be treated as strictly confidential.

Scope and purpose of the collection of data

If you submit a job application to us, we will process any affiliated personal data (e.g., contact and communications data, application documents, notes taken during job interviews, etc.), if they are required to make a decision concerning the establishment or an employment relationship. The legal grounds for the aforementioned are § 26 BDSG according to German Law (Negotiation of an Employment Relationship), Art.

6(1)(b) GDPR (General Contract Negotiations) and – provided you have given us your consent – Art. 6(1)(a) GDPR. You may revoke any consent given at any time. Within our company, your personal data will only be shared with individuals who are involved in the processing of your job application.

If your job application should result in your recruitment, the data you have submitted will be archived on the grounds of § 26 BDSG and Art. 6(1)(b) GDPR for the purpose of implementing the employment relationship in our data processing system.

Data Archiving Period

If we are unable to make you a job offer or you reject a job offer or withdraw your application, we reserve the right to retain the data you have submitted on the basis of our legitimate interests (Art. 6(1)(f) GDPR) for up to 6 months from the end of the application procedure (rejection or withdrawal of the application).

Afterwards the data will be deleted, and the physical application documents will be destroyed. The storage serves in particular as evidence in the event of a legal dispute. If it is evident that the data will be required after the expiry of the 6-month period (e.g., due to an impending or pending legal dispute), deletion will only take place when the purpose for further storage no longer applies.

Longer storage may also take place if you have given your agreement (Article 6(1)(a) GDPR) or if statutory data retention requirements preclude the deletion.

Admission to the applicant pool

If we do not make you a job offer, you may be able to join our applicant pool. In case of admission, all documents and information from the application will be transferred to the applicant pool in order to contact you in case of suitable vacancies

Admission to the applicant pool is based exclusively on your express agreement (Art. 6(1)(a) GDPR). The submission agreement is voluntary and has no relation to the ongoing application procedure. **The affected person can revoke his agreement at any time.** In this case, the data from the applicant pool will be irrevocably deleted, provided there are no legal reasons for storage.

The data from the applicant pool will be irrevocably deleted no later than two years after consent has been granted.

10.2 Notes on the general handling of data from business partners and interested parties

Processing purposes and legal basis

Your personal data will be processed in accordance with the provisions of the General Data Protection Regulation (GDPR), the Federal Data Protection Act (BDSG) and other relevant data protection regulations. The processing and use of individual data depend on the agreed or requested service. Our contractual documents, forms, consent forms and other information provided to you (e.g. on the website or in the terms and conditions) can provide further details and supplements on the processing purposes.

Consent (Art. 6 (1) (a) GDPR)

If you have given us consent to process personal data, the respective consent is the legal basis for the processing mentioned there. You can revoke consent at any time with effect for the future.

Fulfillment of contractual obligations (Art. 6 (1) (b) GDPR)

We process your personal data for the execution of our contracts with you. Furthermore, your personal data is processed for the implementation of measures and activities in the context of pre-contractual relations

Fulfillment of legal obligations (Art. 6 (1) (c) GDPR)

We process your personal data if this is necessary to fulfill legal obligations (e.g. commercial, tax laws).

Furthermore, we may process your data for:

- the prevention of fraud and money laundering
- the prevention, combating and investigation of terrorist financing and crimes that endanger assets
- the fulfillment of control and reporting obligations under tax law
- archiving data for data protection and data security purposes
- auditing by tax and other authorities

In addition, the disclosure of personal data may become necessary in the context of official/court measures for the purpose of gathering evidence, criminal prosecution or enforcement of civil claims.

Legitimate interest of us or third parties (Art. 6 (1) (f) GDPR)

We may also use your personal data on the basis of a balance of interests to protect the legitimate interest of us or third parties. This is done for the following purposes:

- for advertising or market research, if you have not objected to the use of your data
- for obtaining information and exchanging data with credit agencies, if this exceeds our economic risk
- for the limited storage of your data, if deletion is not possible or only possible with disproportionate effort due to the special nature of storage
- for the disclosure of personal data as part of due diligence, e.g. in the case of company sales
- for statistical evaluations or for market analyses
- for the assertion of legal claims and defense in legal disputes that are not directly related to the contractual relationship
- for internal and external investigations and/or security audits
- for the possible listening in or recording of telephone conversations for quality control and training purposes
- for securing and exercising our house rights through appropriate measures (e.g. video surveillance)

Categories of personal data processed by us

We process the following data:

- personal data (name, date of birth, place of birth, nationality, marital status, occupation/industry and similar data)
- contact details (address, email address, telephone number and similar data)
- payment/Coverage confirmation for Bank and Credit Cards
- Information about your financial situation (creditworthiness data including scoring, i.e. data for assessing the economic risk)
- Customer and supplier history

In addition, we process personal data from public sources (e.g. Internet, media, press, trade and civil registers).

We also process personal data that we have legally obtained from third parties (e.g. mailing list providers, credit agencies) if necessary for the provision of our services.

Who receives your data?

We share your personal data within our company with those departments that require your data to comply with contractual and legal obligations or to pursue our legitimate interests.

In addition, the following entities/bodies may receive your data:

- Contract processors commissioned by us (Art. 28 GDPR) service providers for supporting activities and other responsible bodies within the meaning of the GDPR, especially in the areas of, e.g. IT services, logistics and printing services, external data centers, support/maintenance of data processing/IT applications, archiving, document processing, data destruction, marketing, auditing services, credit institutions.
- Public authorities and institutions in the event of a legal or official obligation under which we are obliged to disclose, report or share data or the disclosure of data is in the public interest
- Bodies and institutions on the basis of our legitimate interest or the legitimate interest of a third party (e.g. shared with public authorities, credit agencies, debt collection, lawyers, courts)
- other bodies for which you have given us your consent for the transfer of data

Transfer of your data to a third country or an international organization

A transfer of data to countries outside the European Union (EU) or the European Economic Area (EEA), so-called third countries, takes place if it is necessary for the execution of an order/contract from or with you, if it is required by law (e.g. tax reporting obligations), if it is in the legitimate interest of us or a third party or if you have given us your consent.

In this context, the processing of your data in a third country may also take place in connection with the involvement of service providers as part of commissioned processing.

If there is no EU Commission decision on an adequate level of data protection for the country in question, we ensure that your rights and freedoms are adequately protected and guaranteed in accordance with EU data protection requirements by means of appropriate contracts and measures. We will provide you with the relevant detailed information upon request.

How long do we store your data?

We process your personal data during the entire course of our business relationship as necessary; this also includes the initiation and performance of a contract.

In addition, we are subject to various retention and documentation obligations that are set out in the German Commercial Code (HGB) and the German Fiscal Code (AO), among others. The retention and/or documentation periods specified there are up to ten years beyond the end of the business relationship or the pre-contractual legal relationship.

Ultimately, the retention period is also determined in line with statutory limitation periods, which under section 195 et seq. of the German Civil Code (BGB) are generally three years but may be up thirty years in certain cases.

To what extent is automated decision-making used in individual cases (including profiling)?

We do not use purely automated decision-making procedures as referred to in Article 22 GDPR. Should we use these procedures in individual cases, we will inform you separately provided we are required to do so by law.