

# Privacy Policy CCG DE GmbH

<https://www.ccg-logistics.com>

## 1. Controller for processing according to GDPR

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

Company: CCG DE GmbH  
Street Nr.: Isarstraße 4  
PLZ, Place, Country: 65451 Kelsterbach, Germany  
Handelsregister/Nr.: HRB 92348  
Managing Director: Kai D. Schneider  
Björn Gersch  
Telefon: +49 6107 98126-93  
E-Mail-Adress: [info@ccg-logistics.com](mailto:info@ccg-logistics.com)  
Website: <https://www.ccg-logistics.com>

## 2. Introduction Privacy Policy

We welcome you to our website and are pleased about your interest. The protection of your personal data is very important to us. Therefore, we conduct our business in compliance with applicable laws on data privacy protection and data security. We would like to inform you in the following about which data of your visit is used for which purposes. For further questions please contact our Data Protection Officer:

Nils Möllers

Keyed GmbH

Siemensstraße 12

48341 Altenberge, Westfalen

[info@keyed.de](mailto:info@keyed.de)

+49 (0) 2505 - 639797

<https://keyed.de>

## 3. What are personal data?

The term personal data is defined in the Bundesdatenschutzgesetz and the GDPR. According to these laws, these are individual details about personal or factual circumstances of a specific

or identifiable natural person. This includes, for example, your civil name, your address, your telephone number or your date of birth.

#### **4. Scope of anonymous data collection and data processing**

Unless otherwise stated in the following sections, no personal data is collected, processed or used when using our websites. However, by using analysis and tracking tools, we learn certain technical information based on the data transmitted by your browser (e.g. browser type/version, operating system used, websites visited by us incl. length of stay, previously visited website). We evaluate this information for statistical purposes only.

#### **5. Legal basis for the processing of personal data**

Where we obtain the consent of the data subject for processing operations involving personal data, Article 6 (1) lit. a) of the EU General Data Protection Regulation (GDPR) serves as the legal basis for the processing of personal data. Article 6 (1) lit. b) GDPR serves as the legal basis for the processing of personal data required for the performance of a contract to which the data subject is a party. This also applies to processing operations necessary for the performance of pre-contractual measures. Insofar as the processing of personal data is necessary to fulfil a legal obligation to which our company is subject, Art. 6 (1) lit. c) GDPR serves as the legal basis. In cases where vital interests of the data subject or another natural person make it necessary to process personal data, Article 6 (1) lit. d) GDPR serves as the legal basis. If the processing is necessary to safeguard a legitimate interest of our company or of a third party and if the interests, fundamental rights and freedoms of the data subject do not outweigh the former interest, Article 6 (1) lit. f) of the GDPR serves as the legal basis for the processing.

#### **6. Use of cookies**

This internet page use cookies. Cookies are data that are stored by the Internet browser on the user's computer system. The cookies can be transmitted to a page when it is called up and thus enable the user to be assigned to it. Cookies help to simplify the use of Internet pages for the user.

It is possible to object to the setting of cookies at any time by changing the setting in the Internet browser accordingly. Set cookies can be deleted. Please note that if cookies are deactivated, it may not be possible to use all functions of our website to their full extent. The user data collected in this way is pseudonymised by technical precautions. It is therefore no longer possible to assign the data to the calling user. The data is not stored together with other personal data of the users. When accessing our website, users are informed by an info banner about the use of cookies for analysis purposes and are referred to this data protection declaration. In this context, there is also a note on how the storage of cookies can be prevented in the browser settings. The legal basis for the processing of personal data using technically necessary cookies is Art. 6 Paragraph 1 lit. f) GDPR. The legal basis for the processing of personal data using cookies for analysis purposes is Article 6 (1) lit. a) of the GDPR if the user has given his or her consent. For information on whether and to what extent cookies are used on our website, please refer to our cookie banner and our notes in this data protection declaration.

#### **7. Creation of logfiles**

With each call of the Internet page of the controller collects data and information by an automated system. These are stored in the log files of the server. The data is also stored in the log files of our system. These data are not stored together with other personal data of the user.

- (1) Information about the type of browser and the version used
- (2) The user's operating system
- (3) The user's Internet service provider
- (4) The user's IP address
- (5) The date and time of access
- (6) Websites from which the user's system accesses our website (referrer)
- (7) Websites that are accessed by the user's system via our website

## **8. Contact opportunities**

On the internet pages of the controller there is a contact form which can be used for electronic contact. Alternatively, it is possible to contact us via the provided e-mail address. If the data subject contacts the data controller via one of these channels, the personal data transmitted by the data subject is automatically stored. The storage is solely for the purpose of processing or contacting the data subject. The data will not be passed on to third parties. The legal basis for the processing of the data is Art. 6 Paragraph 1 lit. a) GDPR if the user has given his or her consent. The legal basis for the processing of data transmitted in the course of sending an e-mail is Art. 6 Paragraph 1 letter f) GDPR. If the e-mail contact is aimed at the conclusion of a contract, the additional legal basis for processing is Art. 6 (1) lit. b) GDPR. The data is deleted as soon as it is no longer necessary for the purpose for which it was collected. For personal data from the input mask 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 terminated when it can be concluded from the circumstances that the matter in question has been finally clarified. The personal data additionally collected during the sending process will be deleted after a period of seven days at the latest.

### **8.1 Commentfunction**

When users leave comments in the blog, the user name previously chosen by the website visitor is stored in addition to the information they entered via the input mask. This serves the security of the controller, since the provider can be prosecuted for illegal content on his website, even if it is brought to the site by comments from third parties.

## **9. Newsletter**

If the newsletter of our company is subscribed to, the data in the respective input mask will be transmitted to the person responsible for processing. The subscription to our newsletter is carried out in a so-called double opt-in procedure. This means that after registration you will receive an e-mail asking you to confirm your registration. This confirmation is necessary so that nobody can register with foreign e-mail addresses. When registering for the newsletter, the IP address of the user and the date and time of registration are stored. This serves to prevent abuse of the services or the e-mail address of the person concerned. The data will not be passed on to third parties. An exception is made if there is a legal obligation to pass on data. The data is used exclusively for sending the newsletter. The subscription to the newsletter can be cancelled by the person concerned at any time. Likewise, the consent to the storage of personal data can be revoked at any time. For this purpose there is a corresponding link in every newsletter. The legal basis for the processing of the data after registration for the newsletter by the user is Art. 6 Paragraph 1 letter a) GDPR if the user has given his consent. The legal basis for the dispatch of the newsletter as a result of the sale of goods or services is Art. 7 para. 3 UWG.

## **10. Registration**

If the data subject uses the opportunity to register on the website of the controller by providing personal data, the data in the respective input mask will be transmitted to the controller. The data will be stored exclusively for internal use by the controller. The data will be deleted as soon as they are no longer required to achieve the purpose for which they were collected.

During registration, the user's IP address and the date and time of registration are stored. This serves to prevent misuse of the services. The data will not be passed on to third parties. An exception exists if there is a legal obligation to pass on the data.

The registration of data is necessary for the provision of content or services. Registered persons have the possibility to have the stored data deleted or modified at any time. The person concerned can obtain information about their stored personal data at any time.

### **10.1 Use of the Online-Platform**

As the holder of a customer number, i.e. as a customer registered with us, you are entitled to use our online platform, on which you can independently manage your customer data, among other things. If you would like to register, it is necessary that you enter the customer number, e-mail and your postal code in the corresponding registration form. In addition, it is necessary to provide your e-mail address so that we can contact you in this way. After you have registered, you will be able to view and manage the contact information you provided during customer registration and that we have stored. In addition, you can view your invoices and credit notes. The processing of your personal data for these purposes serves to implement the contractual relationship with you and is based on Art. 6 (1) p. 1 lit. b) GDPR. You also have the option of using the online platform for other services, such as subscribing to our newsletter (see section 19 below). If you delete your account, this will only affect your Online Platform account. You therefore remain a customer and can talk to your sales consultant as usual.

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

The controller shall process and store personal data relating to the data subject only for as long as necessary to achieve the purpose of storage. In addition, data may be stored for as long as this is provided for by the European or national legislator in Union regulations, laws or other provisions to which the controller is subject. As soon as the storage purpose ceases to apply or a storage period prescribed by the aforementioned regulations expires, the personal data is routinely blocked or deleted.

## **12. Duration of storage of personal data**

Personal data is stored for the duration of the respective legal retention period. After expiry of the period, the data is routinely deleted, unless it is necessary for the initiation or fulfilment of a contract.

## **13. Recipient of personal data / collaboration with processors and third parties**

We are part of the METRO Group. In order to achieve the purposes mentioned above, we use service providers as processors in accordance with Article 28 GDPR, for example as IT service providers, to dispatch the goods ordered by you, to send post, e-mail and texts or to contact you by phone. They may be external service providers or companies within the METRO Group such as service centres used by various METRO Group companies (shared service centres). These service providers can be based within or outside the European Union or the European Economic Area. We use contractual agreements ("processing agreements") with our service providers to ensure that they process personal data in accordance with the requirements of

the GDPR, even if data processing takes place outside the European Union or the European Economic Area in countries in which an adequate level of data protection is otherwise not guaranteed and for which there is no adequacy decision by the European Commission as explained in Section 5 below. You can contact our Data Protection Officer at [datenschutz@ccg-logistics.com](mailto:datenschutz@ccg-logistics.com) for further information on the existence of a European Commission adequacy decision and adequate guarantees, and to obtain a copy of these guarantees. We will only transfer additional data to third parties if there is a legal obligation to do so. The legal basis for such transfer will in this case be Article 6, Paragraph 1, Sentence 1(c) GDPR.

In the context of processing on our behalf, a third-party provider provides us with services for hosting and displaying our website. This serves to protect our legitimate interests in a correct representation of our services; such interests prevail when all interests are weighed up. All data collected within the framework of the use of this website or in the forms provided for this purpose in the online shop as described below are processed on the provider's servers. Processing on other servers will only take place within the scope described here.

Transfers to third countries: if we process data in third countries (i.e. outside the European union (EU) or the European Economic Area (EEA)) or if data is processed there in the context of using third-party services, or when disclosing or sending data to third parties, this will only take place in order to fulfil our (pre)contractual obligations, based on your consent, due to a legal obligation or based on our legitimate interests. Subject to legal or contractual permission, we only process the data or allow the data to be processed in a third country if the special requirements of Article 44 et seq. GDPR have been met. This means that such processing takes place, for example, on the basis of special guarantees, such as the officially recognised determination of a data protection level corresponding to the EU regulations or compliance with officially recognised, special contractual obligations (referred to as "standard contractual clauses").

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

If your personal data is processed, you are the data subject within the meaning of the GDPR and you are entitled to the following rights in relation to the person responsible:

### **14.1 Right of access by the data subject acc. to Art. 15 GDPR**

You can request confirmation from the person responsible as to whether personal data concerning you is being processed by us. If such processing is carried out, you may ask the controller for information on:

- a. the purposes for which the personal data are processed;
- b. the categories of personal data processed;
- c. the recipients or categories of recipients to whom your personal data have been or will be disclosed;
- d. the planned duration of storage of your personal data or, if it is not possible to give specific details, criteria for determining the duration of storage
- e. the existence of a right to rectification or erasure of your personal data, a right to have the processing limited by the controller or a right to object to such processing
- f. the existence of a right of appeal to a supervisory authority;
- g. all available information on the origin of the data when the personal data are not collected from the data subject;
- h. the existence of automated decision making, including profiling, in accordance with Art. 22, para. 1 and 4 GDPR and, at least in these cases, meaningful information on the logic involved and the scope and intended effects of such processing on the data subject.

You have the right to request information as to whether your personal data are transferred to a third country or to an international organisation. In this context, you may request to be informed of the appropriate guarantees in accordance with Art. 46 GDPR in connection with the transfer.

#### **14.2 Right to rectification acc. to Art. 16 GDPR**

You have the right to obtain from the data controller the rectification and/or integration of any personal data processed concerning you if it is incorrect or incomplete. The data controller shall make the correction without delay.

#### **14.3 Right to lodge a complaint with a supervisory authority acc. to Art. 78 GDPR**

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your residence, place of employment or place of the alleged infringement, if you consider that the processing of your personal data infringes the GDPR. The supervisory authority to which the complaint has been lodged will inform the complainant of the status and outcome of the complaint, including the possibility of a judicial remedy under Article 78 of the GDPR.

#### **14.4 Right to data portability acc. to Art. 20 GDPR**

You have the right to receive your personal data, which you have provided to the responsible person, in a structured, common and machine-readable format. In addition, you have the right to transfer this data to another responsible party without hindrance by the responsible party to whom the personal data has been made available, provided that

- a. the processing is based on consent pursuant to Art. 6 Para. 1 letter a) GDPR or Art. 9 Para. 2 letter a) GDPR or on a contract pursuant to Art. 6 Para. 1 letter b) GDPR and
- b. the processing is carried out using automated procedures. In exercising this right, you also have the right to request that your personal data be transferred directly from one responsible party to another, insofar as this is technically feasible. The freedoms and rights of other persons may not be impaired by this. The right to data transferability shall not apply to the processing of personal data necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

#### **14.5 Right to restriction of processing acc. to Art. 18 GDPR**

Under the following conditions, you may request the restriction of the processing of your personal data:

- a. if you dispute the accuracy of your personal data for a period of time that allows the controller to verify the accuracy of the personal data;
- b. if the processing is unlawful and you refuse to delete the personal data and instead request the restriction of the use of the personal data;
- c. if the controller no longer needs the personal data for the purposes of the processing, but you need them for the assertion, exercise or defence of legal claims; or
- d. if you have lodged an objection to the processing pursuant to Article 21 (1) of the GDPR and it is not yet clear whether the legitimate reasons of the controller outweigh your reasons.

If the processing of your personal data has been restricted, these data - apart from their storage - may only be processed with your consent or for the purpose of asserting, exercising or defending legal claims or protecting the rights of another natural or legal person or for reasons of major public interest of the Union or a Member State. If the restriction on processing has

been restricted in accordance with the above conditions, you will be informed by the controller before the restriction is lifted.

#### **14.6 Right to erasure acc. to Art. 17 GDPR**

(1) You may request the controller to delete your personal data immediately and the controller is obliged to delete such data immediately if one of the following reasons applies:

The personal data concerning you are no longer necessary for the purposes for which they were collected or otherwise processed.

You revoke your consent on which the processing was based in accordance with Article 6 (1) (a) or Article 9 (2) (a) of the GDPR and there is no other legal basis for the processing.

You object to the processing in accordance with Article 21 (1) GDPR and there are no legitimate reasons for the processing which take precedence, or you object to the processing in accordance with Article 21 (2) GDPR.

The personal data concerning you have been processed unlawfully

The deletion of personal data concerning you is necessary to comply with a legal obligation under Union law or the law of the Member States to which the controller is subject.

The personal data concerning you have been collected in relation to information society services offered, in accordance with Article 8 (1) of the GDPR.

(2) If the controller has made your personal data public and is obliged to delete them in accordance with Article 17 (1) of the GDPR, he shall take reasonable measures, including technical measures, taking into account the available technology and implementation costs, to inform data controllers who process the personal data that you, as a data subject, have requested them to delete all links to these personal data or copies or replications of these personal data.

(3) The right to erasure shall not apply where the processing is necessary

for the exercise of the right to freedom of expression and information;

to comply with a legal obligation to which the processing is subject under Union or national law to which the controller is subject, or to carry out a task carried out in the public interest or in the exercise of official authority vested in the controller;

for reasons of public interest relating to public health pursuant to Art. 9, para. 2 lit. h and i as well as Art. 9 para. 3 GDPR;

for archiving purposes in the public interest, for scientific or historical research purposes or for statistical purposes pursuant to Art. 89 para. 1 GDPR, insofar as the right referred to in para. 1 is likely to render impossible or seriously prejudice the attainment of the objectives of such processing, or to assert, exercise or defend legal claims.

#### **14.7 Notification obligation regarding rectification or erasure of personal data or restriction of processing acc. to Art. 19 GDPR**

If you have exercised the right to rectify, erase or limit the processing, the controller is obliged to notify all recipients to whom the personal data concerning you have been disclosed of this rectification, erasure or limitation of processing, unless this proves impossible or involves a disproportionate effort. You have the right to be informed of these recipients by the controller.

## **14.8 Right to object acc. to Art. 21 GDPR**

You have the right to revoke your data protection declaration of consent at any time. Revocation of your consent does not affect the legality of the processing that has taken place on the basis of your consent until revocation.

## **14.9 Automated decision in individual cases including profiling**

You have the right not to be subject to a decision based solely on automated processing operations, including profiling, which produces legal effects vis-à-vis it or significantly affects it in a similar way. This shall not apply where the decision is necessary for the conclusion or performance of a contract between you and the controller,

is authorised by Union or national legislation to which the controller is subject and that legislation lays down appropriate measures to safeguard your rights and freedoms and legitimate interests,

or is made with your express consent.

However, such decisions may not relate to specific categories of personal data as defined in Art. However, these decisions may not be based on special categories of personal data under Art. 9 Par. 1 GDPR, unless Art. 9 Par. 2 lit. a) or g) applies and adequate measures have been taken to protect the rights and freedoms as well as your legitimate interests.

In the cases referred to in a. and c., the controller shall take adequate measures to safeguard the rights and freedoms as well as your legitimate interests, which shall include at least the right to obtain the intervention of a person from the controller, to express his or her point of view and to challenge the decision.

## **15. Integration of other third-party services and content**

### **15.1 Description and purpose**

It can happen that within this online offer contents of third parties, such as videos, fonts or graphics from other websites are integrated. This always requires that the providers of these contents (hereinafter referred to as "third party providers") are aware of the IP address of the users. Without the IP address, they would not be able to send the content to the browser of the respective user. The IP address is therefore necessary for the display of this content. We make every effort to use only such content whose respective providers use the IP address only to deliver the content. However, we have no influence on this if the third-party providers store the IP address for statistical purposes, for example. As far as we are aware of this, we inform the users about it. We would like to provide and improve our online offer through these integrations.

### **15.2 Legal basis**

The legal basis for the integration of other services and content of third parties is Art. 6 para. 1 lit. f) DSGVO. Our overriding legitimate interest lies in the intention of an appropriate presentation of our online presence and user-friendly and economically efficient services on our part. For further information, please refer to the respective privacy statements of the providers.

- [fonts.googleapis.com](https://fonts.googleapis.com)
- [maps.gstatic.com](https://maps.gstatic.com)
- [www.facebook.com](https://www.facebook.com)



- [www.gstatic.com](http://www.gstatic.com)
- [fonts.gstatic.com](http://fonts.gstatic.com)
- [www.google.com](http://www.google.com)
- [mt.googleapis.com](http://mt.googleapis.com)
- [ssl.gstatic.com](http://ssl.gstatic.com)
- [cdn.jsdelivr.net](http://cdn.jsdelivr.net)
- [connect.facebook.net](http://connect.facebook.net)
- [maps.googleapis.com](http://maps.googleapis.com)

### **15.3 Contractual or legal obligation to provide personal data**

The provision of personal data is neither legally nor contractually required and is also not necessary for the conclusion of a contract. You are also not obliged to provide the personal data. However, failure to provide it may mean that you are unable to use this function or cannot use it to its full extent.

## **16. Data transmission to third countries**

The controller may transfer personal data to a third country. In principle, the controller may provide various appropriate safeguards to ensure that an adequate level of protection is provided for the processing operations. It is possible to transfer data transfers on the basis of an adequacy finding, internal data protection rules, approved codes of conduct, standard data protection clauses or an approved certification mechanism pursuant to Art. 46 para. 2 letters a) - f) GDPR.

If the person responsible undertakes a transfer to a third country on the legal basis of Art. 49 para. 1 a) GDPR, you will be informed at this point about the possible risks of a data transfer to a third country.

There is a risk that the third country receiving your personal data may not provide an equivalent level of protection compared to the protection of personal data in the European Union. This may be the case, for example, if the EU Commission has not issued an adequacy decision for the third country in question or if certain agreements between the European Union and the third country in question are declared invalid. Specifically, there are risks in some third countries with regard to the effective protection of EU fundamental rights through the use of monitoring laws (e.g. USA). In such a case, it is the responsibility of the controller and the recipient to assess whether the rights of data subject in the third country enjoy a level of protection equivalent to that in the Union and can be effectively enforced.

However, the basic data protection regulation should not undermine the level of protection of natural persons ensured throughout the Union when personal data are transferred from the Union to controllers, processors or other recipients in third countries or to international organizations, even if personal data are further transferred from a third country or from an international organization to controllers or processors in the same or another third country or to the same or another international organization.

## **17. Google Analytics und Conversion Tracking**

### **17.1 Description and purpose**

This website uses the service "Google Analytics", which is provided by Google LLC. (1600 Amphitheatre Parkway Mountain View, CA 94043, USA) to analyse the use of the website by

users. The service uses "cookies" - text files which are stored on your end device. The information collected by the cookies is usually sent to a Google server in the USA and stored there. If necessary, Google Analytics is used on this website with the code "gat.\_anonymizeIp();" extended to ensure anonymous recording of IP addresses (so-called IP-Masking). Please also note the following information on the use of Google Analytics: Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how users use the site. The IP address of users is shortened within the member states of the EU and the European Economic Area. This shortening means that the personal reference of your IP address is no longer necessary. Within the framework of the agreement on commissioned data, which the website operators have concluded with Google LLC, the latter uses the information collected to create an evaluation of website use and website activity and provides services associated with Internet use.

## **17.2 Legal basis**

The legal basis is the norm of Art. 6 para. 1 lit. a) and Art. 49 para. 1 lit. a) GDPR, if anonymous data collection using the code "gat.\_anonymizeIp" does not take place. Otherwise, especially in the case of the use of "gat.\_anonymizeIp", Art. 6 para. 1 lit. f) GDPR is the legal basis.

## **17.3 Receiver**

However, in the event that IP anonymisation is activated on this website, your IP address will be shortened by Google in advance within member states of the European Union or in other contracting states of the Agreement on the European Economic Area. The information generated by the cookie about your use of this website is usually transferred to a Google server in the USA and stored there. Only in exceptional cases is the full IP address transferred to a Google server in the USA and shortened there. On behalf of the operator of this website, Google will use this information to evaluate your use of the website, to compile reports on the website activities and to provide further services to the website operator in connection with the use of the website and the Internet. In addition, we use Google Conversion Tracking in connection with Google Analytics. This enables us to record the behaviour of our website visitors. For example, it shows us how many PDFs were downloaded from our website or how often the contact form was filled out. It also shows us how many clicks on advertisements from external sources (AdWords, LinkedIn, Xing, Facebook, Pinterest, Instagram etc.) have led to our website. The IP address transmitted by your browser within the framework of Google Analytics is not merged with other data from Google. 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. You can also prevent the collection of data generated by the cookie and related to your use of the website (including your IP address) to Google and the processing of this data by Google by downloading and installing the browser plugin available at the following link (<https://tools.google.com/dlpage/gaoptout?hl=de>). You can prevent the collection by Google Analytics by clicking on the following link.

## **17.4 Transfer to third countries**

Personal data is transferred to the USA under the Art. 46 GDPR and Art. 49 GDPR.

## **17.5 Duration of data storage**

The data sent by us and linked to cookies, user IDs (e.g. User ID) or advertising IDs are automatically deleted after 14 months. The deletion of data whose retention period has been reached is automatically carried out once a month.

## **17.6 Cancellation and objection option**

You can prevent the storage of cookies by adjusting your browser software accordingly; however, we would like to point out that in this case you may not be able to use all the functions of this website to their full extent. You can also prevent the collection of data generated by the cookie and related to your use of the website (including your IP address) to Google and the processing of this data by Google by downloading and installing the browser add-on. Opt-out cookies prevent the future collection of your data when visiting this website. To prevent Universal Analytics from collecting data across multiple devices, you must opt-out on all systems in use. Click here to set the opt-out cookie: [Deactivate Google Analytics](#)

### **17.7 Contractual or legal obligation**

The provision of personal data is not required by law or contract, nor is it necessary for the conclusion of a contract. You are also not obliged to provide the personal data. However, failure to provide it may mean that you cannot or cannot fully use this function of our website.

### **17.8 Further data protection information via link**

Further information on terms of use and data protection can be found at: <https://policies.google.com/?hl=de&gl=de> <https://policies.google.com/privacy?hl=de&gl=de>

## **18. Facebook Connect**

### **18.1 Description and purpose**

On our website we use a web tracking service provided by the company Facebook, Inc., 1601 Willow Road, 94024 Menlo Park, USA (hereinafter: Facebook Connect). Facebook Connect uses cookies in the context of web tracking, which are stored on your computer and which enable an analysis of the use of our website and your surfing behaviour (so-called tracking). We carry out this analysis on the basis of the tracking service of Facebook Connect in order to constantly optimise our internet offer and make it more accessible.

### **18.2 Legal basis**

The legal basis is the norm of Art. 6 para. 1 lit. a) and Art. 49 para. 1 lit. a) GDPR.

### **18.3 Receiver**

In the course of using our website, data, such as in particular your IP address and your user activities, are transmitted to Facebook servers.

### **18.4 Transfer to third countries**

The mentioned data is processed and stored outside the European Union, e.g. in the USA.

### **18.5 Duration of data storage**

The data will be deleted as soon as the purpose of their collection has been fulfilled.

### **18.6 Cancellation and objection option**

You can prevent the collection and forwarding of personal data (in particular your IP address) and the processing of this data by deactivating the execution of script code in your browser, installing a script blocker in your browser (this can be found e.g. at [www.noscript.net](http://www.noscript.net) or [www.ghostery.com](http://www.ghostery.com)) or activating the "Do Not Track" setting of your browser.

### **18.7 Contractual or legal obligation**

The provision of personal data is not required by law or contract and is not necessary for the conclusion of a contract. You are also not obliged to provide the personal data. However, failure to provide it may mean that you are unable to use this function of our website or cannot use it to its full extent.

## **18.8 Further data protection information via link**

For more information on the processing of the transferred data, please refer to the Facebook Connect privacy policy: <https://www.facebook.com/privacy/explanation>.

## **19. Facebook Custom Audiences**

### **19.1 Description and purpose**

Custom Audiences are target groups that advertisers of the social network Facebook can create in order to optimize advertisements on Facebook even more precisely. For example, by creating so-called "custom audiences", i.e. target groups, an advertising company can have Facebook advertise specifically to those who have visited the website of the advertising company via the social network. Alternatively or cumulatively, this targeted advertising is also possible if the advertising company has e-mail addresses or telephone numbers of the respective persons.

### **19.2 Legal basis**

The legal basis is the norm of Art. 6 para. 1 lit. a) and Art. 49 para. 1 lit. a) GDPR.

### **19.3 Recipient**

The recipient of the data is Facebook Inc, 1601 S. California Ave, Palo Alto, CA 94304, USA ("Facebook") and Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

### **19.4 Transfer to third countries**

The infrastructure that serves as the physical host for the advertising account is located in the US Facebook data centers in Oregon and North Carolina and in Lulea, Sweden.

### **19.5 Duration of data storage**

The data is deleted as soon as it is no longer required for the purpose for which it was collected. In addition, the data will be deleted if you revoke your consent or request the deletion of your personal data.

### **19.6 Option to withdraw your consent (opt-out)**

You can object to the use of your data for the display of Facebook ads. To set which types of ads are displayed to you within Facebook, you can go to the page set up by Facebook and follow the instructions on the settings for usage-based ads: [www.facebook.com/settings](http://www.facebook.com/settings). The settings are platform-independent, which means they apply to all devices, including desktop and mobile devices.

### **19.7 Contractual or legal obligation to provide personal data**

The provision of personal data is not required by law or contract and is not necessary for the conclusion of a contract. You are also not obliged to provide the personal data. However, failure to provide it may mean that you are unable to use this function of our website or cannot use it to its full extent.

### **19.8 Further data protection information**

Further information on terms of use and data protection can be found at: <https://www.facebook.com/about/privacy>

Further information on Facebook Custom Audiences can be found here: <https://de-de.facebook.com/business/help/744354708981227>

## **20. Facebook Pixel**

### **20.1 Description and purpose**

To recognize your user behavior, we use the so-called Facebook pixel from Facebook Inc. 1 Hacker Way, Menlo Park, California 94025, USA. This is an analysis tool with which the effectiveness of the advertising can be measured. It is a code snippet for the website, which can be used to measure, optimize and build up for advertising campaign target groups. Conversion measurement allows us to track what people do after they see our Facebook ads across devices (including mobile phones, tablets and desktop computers). By creating a Facebook pixel and adding it to our pages where conversions are made (e.g., the Purchase Confirmation page), we can determine which people are making conversions based on our Facebook Ads. The pixel is used to further monitor the actions that people take after clicking on our ads. It allows us to determine on which device our customers saw the ad and on which devices they ultimately performed the conversion. According to Facebook, the data collected includes

### **20.2 HTTP headers**

HTTP headers contain a variety of information that is sent over a standard web protocol between any browser request and any server on the Internet. HTTP headers contain information such as IP addresses (which in Germany can only be evaluated at the general country level), information about the web browser, page location, document, URI reference and user agent of the web browser.

### **20.3 Pixel-specific data**

This includes the pixel ID and Facebook cookie data used to associate events with a specific Facebook advertising account and to associate it with a person known to Facebook.

### **20.4 Optional values**

Developers and marketers can optionally send additional information about the visit through standard and custom data events. Typical custom data events include information about whether a purchase was made on a page, conversion value, and more. For more information about custom data events, click here. With your consent, we use the "visitor action pixel" of Facebook Inc, 1 Hacker Way, Menlo Park, California 94025, USA or if you are located in the EU, Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, within our website. This conversion tool allows us to track your actions after you have seen or clicked on a Facebook advertisement. This is used to monitor and analyze the effectiveness of our Facebook Ads for statistical and market research purposes. Although we can only recognize this data in anonymized form, Facebook also stores and processes this data. What exactly Facebook does with this data is not known to us, but it can be assumed that Facebook can and will link this data to your Facebook account. Thus, Facebook can use this information for the purpose of advertising, market research and demand-oriented design of Facebook pages. For this purpose, Facebook and its partners create usage, interest and relationship profiles, e.g. to evaluate your use of our website with regard to the advertisements displayed to you on Facebook, to inform other Facebook users about your activities on our website and to provide other services associated with the use of Facebook. Cookies can also be stored on your PC for this purpose. For the purpose and scope of data collection and the further

processing and use of data by Facebook, as well as your rights in this regard and setting options for protecting your privacy, please refer to the Facebook data protection information. The data may be merged with other Facebook services, such as Custom Audiences.

## **20.5 Extended adjustment**

Advertisers can optionally enable the advanced Facebook pixel matching feature by sending encrypted information such as email address or phone number to Facebook. Advertisers can send one or more of the following identifiers for matching: Email address, phone number, first name, last name, city, state, zip code, date of birth, or gender.

## **20.6 Legal basis**

The legal basis is the norm of Art. 6 para. 1 lit. a) and Art. 49 para. 1 lit. a) GDPR.

## **20.7 Receiver**

Receiver is Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA ("Facebook") and Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

## **20.8 Transfer to third countries**

The mentioned data is processed and stored outside the European Union, e.g. in the USA.

## **20.9 Duration of data storage**

According to Facebook, the data sent from the Facebook pixel to Facebook is stored for 180 days. After this time, the data will be encrypted and anonymized by Facebook. For more information on the storage period, see "Data storage, deactivation and deletion of accounts" at: <https://de-de.facebook.com/about/privacy/>

## **20.10 Cancellation and objection option**

You may object to the collection by the Facebook pixel and use of your information to display Facebook ads. To control what types of ads are displayed to you within Facebook, you can go to the page set up by Facebook and follow the instructions on usage-based advertising settings: [www.facebook.com/settings](http://www.facebook.com/settings). The settings are platform-independent, which means they apply to all devices, such as desktop computers or mobile devices. Contractual or Legal Obligation to Provide Personal Information The provision of personal information is not required by law or contract, nor is it necessary for the conclusion of a contract. You are also not obliged to provide the personal data. However, failure to provide it may mean that you are unable to use this function of our website or cannot use it to its full extent.

## **20.11 Contractual or legal obligation**

The provision of personal data is not required by law or contract and is not necessary for the conclusion of a contract. You are also not obliged to provide the personal data. However, failure to provide it may mean that you are unable to use this function of our website or cannot use it to its full extent.

## **20.12 Further data protection information via link**

Further information on terms of use and privacy can be found at: <https://www.facebook.com/about/privacy>

Further information on the Facebook pixel can be found here: <https://www.facebook.com/business/help/651294705016616>

<https://developers.facebook.com/docs/facebook-pixel>

## **21. Futher functions of the website**

### **21.1 Recruiting**

By submitting their application to us, applicants agree to the processing of their data for the purposes of the application procedure in accordance with the type and scope described in this data protection declaration. Insofar as special categories of personal data within the meaning of Art. 9 Para. 1 GDPR are voluntarily communicated as part of the application procedure, they will also be processed in accordance with Art. 9 Para. 2 lit. b GDPR (e.g. health data, such as severely disabled status or ethnic origin). Insofar as special categories of personal data within the meaning of Art. 9 Para. 1 GDPR are requested from applicants within the framework of the application procedure, their processing is additionally carried out in accordance with Art. 9 Para. 2 letter a GDPR (e.g. health data if these are necessary for the exercise of the profession). If made available, applicants can submit their applications to us by means of an online form on our website. The data will be transmitted to us in encrypted form according to the state of the art. Applicants can also send us their applications by e-mail. Please note, however, that e-mails are generally not encrypted and that applicants must ensure that they are encrypted themselves. We can therefore not assume any responsibility for the transmission path of the application between the sender and the receipt on our server and therefore recommend rather to use an online form or the postal dispatch. This is because instead of applying via the online form and e-mail, applicants still have the option of sending us their application by post. In the event of a successful application, the data provided by the applicants can be processed by us for the purposes of the employment relationship. Otherwise, if the application for a job offer is not successful, the applicants' data is deleted. Applicants' data is also deleted if an application is withdrawn, which applicants are entitled to do at any time. Subject to a justified revocation by the applicants, the data will be deleted after the expiry of a period of six months so that we can answer any follow-up questions regarding the application and meet our obligations to provide evidence under the Equal Treatment Act. Invoices for any reimbursement of travel expenses will be archived in accordance with tax law requirements.

### **21.2 Recruiting via SCOPE**

We use the standardized products of the job and applicant management SCOPE Recruiting - Reinhart, Neumann und Mutzenberger GbR with headquarters in Heidelberger Straße 4, 60327 Frankfurt am Main. First and foremost, personal data of applicants is prepared and made available in the SCOPE backend in various display modes for further processing by the person responsible. SCOPE takes comprehensive technical and organizational measures to ensure an adequate level of protection in accordance with Art. 32 GDPR.

In addition to the regular inspection and maintenance of the storage media, accesses by SCOPE to (possibly personal) data of the Responsible Party shall take place, if necessary, within the scope of technical assistance (support services). This concerns in particular instructions for deletion or backup of data. Against this background, a commissioned processing contract was agreed between the parties pursuant to Art. 28 GDPR.

Our legal basis for the use of SCOPE is formed by our legitimate interest in efficient job applicant management pursuant to Art. 6 (1) lit. f) GDPR.

The data provided by applicants may be processed by us for the purposes of the employment relationship in the event of a successful application. Otherwise, if the application for a job offer is not successful, the applicants' data will be deleted. Applicants' data will also be deleted if an application is withdrawn, which applicants are entitled to do at any time. Subject to a justified withdrawal by the applicants, the deletion will take place after the expiry of a period of six

months so that we can answer any follow-up questions about the application and satisfy our obligations to provide evidence under the Equal Treatment Act. Invoices for any reimbursement of travel expenses will be archived in accordance with tax law requirements.

## **22. Safety**

We have taken extensive technical and operational precautions to protect your data from accidental or deliberate manipulation, loss, destruction or access by unauthorised persons. Our security procedures are regularly reviewed and adapted to technological progress. In addition, we guarantee data protection on an ongoing basis by constantly auditing and optimizing our data protection organization.

## **23. Conclusion**

The controller reserves all rights to make changes and updates to this privacy policy. This privacy policy was created by Keyed GmbH on 11.03.2021.