



# Privacy Policy

## 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.

#### 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 provider:

### **Mittwald**

The provider is the Mittwald CM Service GmbH & Co. KG, Königsberger Straße 4-6, 32339 Espelkamp, Germany (hereinafter referred to as Mittwald).

For details, please view the data privacy policy of Mittwald: <https://www.mittwald.de/datenschutz>.

We use Mittwald on the basis of Art. 6(1)(f) GDPR. We have a legitimate interest in the most reliable depiction of our website 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) TTDSG, 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 TTDSG. This consent can be revoked at any time.

### **Data processing**

We have concluded a data processing agreement (DPA) with the above-mentioned provider. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.

## **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:

Destilla GmbH  
Erninger Straße 2  
86720 Nördlingen, Deutschland

Phone: +49 (0) 9081 / 27 38 27 0  
E-mail: [info@destilla.com](mailto:info@destilla.com)

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) TTDSG. 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.

fly-tech IT GmbH & Co. KG  
Herr Christian Köhler  
Winterbrückenweg 58  
86316 Friedberg

Phone: [Telefonnummer des Datenschutzbeauftragten]

E-mail: [datenschutz@destilla.com](mailto:datenschutz@destilla.com)

## **Information on data transfer to the USA and other non-EU countries**

Among other things, we use tools of companies domiciled in the United States or other from a data protection perspective non-secure non-EU countries. If these tools are active, your personal data may potentially be transferred to these non-EU countries and may be processed there. We must point out that in these countries, a data protection level that is comparable to that in the EU cannot be guaranteed. For instance, U.S. enterprises are under a mandate to release personal data to the security agencies and you as the data subject do not have any litigation options to defend yourself in court. Hence, it cannot be ruled out that U.S. agencies (e.g., the Secret Service) may process, analyze, and permanently archive your personal data for surveillance purposes. We have no control over these processing activities.

## **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 demand that we hand over any data we automatically process on the basis of your consent or in order to fulfil a contract be handed over to you or a third party in a commonly used, 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 at any time demand information about your archived personal data, their source and recipients as well as the purpose of the processing of your data. 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 in lieu 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.

## **Rejection of unsolicited e-mails**

We herewith object to the use of contact information published in conjunction with the mandatory information to be provided in our Site Notice to send us promotional and information material that we have not expressly requested. The operators of this website and its pages reserve the express right to take legal action in the event of the unsolicited sending of promotional information, for instance via SPAM messages.

# **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.

In some cases, it is possible that third-party cookies are stored on your device once you enter our site (third-party cookies). These cookies enable you or us to take advantage of certain services offered by the third party (e.g., cookies for the processing of payment services).

Cookies have a variety of functions. Many cookies are technically essential since certain website functions would not work in the absence of the cookies (e.g., the shopping cart function or the display of videos). The purpose of other cookies may be the analysis of user patterns or the display of promotional messages.

Cookies, which are required for the performance of electronic communication transactions, or 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, processing occurs exclusively on the basis of the consent obtained (Art. 6(1)(a) GDPR and § 25 (1) TTDSG); 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.

In the event that third-party cookies are used or if cookies are used for analytical purposes, we will separately notify you in conjunction with this Data Protection Policy and, if applicable, ask for your consent.

## **Consent with Borlabs Cookie**

Our website uses the Borlabs consent technology to obtain your consent to the storage of certain cookies in your browser or for the use of certain technologies and for their data privacy protection compliant documentation. The provider of this technology is Borlabs GmbH, Rübenkamp 32, 22305 Hamburg, Germany (hereinafter referred to as Borlabs).

Whenever you visit our website, a Borlabs cookie will be stored in your browser, which archives any declarations or revocations of consent you have entered. These data are not shared with the provider of the Borlabs technology.





The recorded data shall remain archived until you ask us to eradicate them, delete the Borlabs cookie on your own or the purpose of storing the data no longer exists. This shall be without prejudice to any retention obligations mandated by law. To review the details of Borlabs' data processing policies, please visit <https://de.borlabs.io/kb/welche-daten-speichert-borlabs-cookie/>

We use the Borlabs cookie consent technology to obtain the declarations of consent mandated by law for the use of cookies. The legal basis for the use of such cookies 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. Analysis tools and advertising**

### **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 summarized in a user-ID and assigned to the respective end device of the website visitor.

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) TTDSG. 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://privacy.google.com/businesses/controllerterms/mccs/>.

### **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>.

### **Contract data processing**

We have executed a contract data processing agreement with Google and are implementing the stringent provisions of the German data protection agencies to the fullest when using Google Analytics.

### **WP Statistics**

This website uses the WP Statistics analysis tool to evaluate visitor accesses statistically. The provider is Veronalabs, ARENCO Tower, 27th Floor, Dubai Media City, Dubai, Dubai 23816, UAE (<https://veronalabs.com>).

WP Statistics can be used to analyze the use of our website. In doing so, WP Statistics records, among other things, log files (IP address, referrer, browser used, origin of the user, search engine used) and actions that the website visitors have taken on the site (e.g. clicks and views).

The data collected with WP Statistics is stored exclusively on our own server.

The use of this analysis tool is based on Art. 6(1)(f) GDPR. We have a legitimate interest in the anonymized analysis of user behavior in order to optimize both our websites and our advertising. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6(1)(a) GDPR and § 25 (1) TTDSG, 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 TTDSG. This consent can be revoked at any time.

### **IP anonymization**

We use WP Statistics with anonymized IP. Your IP address is shortened so that it can no longer be directly assigned to you.

## **6. Newsletter**



## **Newsletter data**

If you would like to receive the newsletter offered on the website, we require an e-mail address from you as well as information that allows us to verify that you are the owner of the e-mail address provided and that you agree to receive the newsletter. Further data is not collected or only on a voluntary basis. For the handling of the newsletter, we use newsletter service providers, which are described below.

## **Rapidmail**

This website uses Rapidmail for the sending of newsletters. The provider is the rapidmail GmbH, Augustinerplatz 2, 79098 Freiburg i.Br., Germany.

Rapidmail services can, among other things, be used to organize and analyze the sending of newsletters. The data you enter for the purpose of subscribing to the newsletter are archived on Rapidmail servers in Germany.

## **Data analysis by Rapidmail**

For analytical purposes, e-mails sent via Rapidmail are tagged with a so-called "Tracking Pixel", which connects to Rapidmail's servers once the e-mail is opened. As a result, it is possible to determine whether a newsletter e-mail was actually opened.

With the assistance of Rapidmail we are also able to determine whether and which links in the newsletter message the recipient clicked. All links integrated into the e-mail are so-called Tracking Links that enable us to count your clicks. If you do not want to permit an analysis by Rapidmail, you must unsubscribe from the newsletter. We provide a link for you to do this in every newsletter message. Moreover, you can also unsubscribe from the newsletter right on the website.

For more details on the Rapidmail analysis functions, please follow this link: <https://de.rapidmail.wiki/kategorien/statistiken/>.

## **Legal basis**

The data is processed based on your consent (Art. 6(1)(a) GDPR). You may revoke any consent you have given at any time by unsubscribing from the newsletter. This shall be without prejudice to the lawfulness of any data processing transactions that have taken place prior to your revocation.

## **Storage period**

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. 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.**

For more details, please consult the Data Protection Regulations of Rapidmail at: <https://www.rapidmail.de/datensicherheit>.

### **Data processing**

We have concluded a data processing agreement (DPA) with the above-mentioned provider. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.

## **7. Plug-ins and Tools**

### **Google Fonts (local embedding)**

This website uses so-called Google Fonts provided by Google to ensure the uniform use of fonts on this site. These Google fonts are locally installed so that a connection to Google's servers will not be established in conjunction with this application.

For more information on Google Fonts, please follow this link: <https://developers.google.com/fonts/faq> and consult Google's Data Privacy Declaration under: <https://policies.google.com/privacy?hl=en>.

### **Google Maps**

This website uses the mapping service Google Maps. The provider is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

To enable the use of the Google Maps features, your IP address must be stored. As a rule, this information is transferred to one of Google's servers in the United States, where it is archived. The operator of this website has no control over the data transfer. In case Google Maps has been activated, Google has the option to use Google Fonts for the purpose of the uniform depiction of fonts. When you access Google Maps, your browser will load the required web fonts into your browser cache, to correctly display text and fonts.

We use Google Maps to present our online content in an appealing manner and to make the locations disclosed on our website easy to find. This constitutes a legitimate interest as defined in Art. 6(1)(f) GDPR. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6(1)(a) GDPR and § 25 (1)



TTDSG, 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 TTDSG. This consent can be revoked 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://privacy.google.com/businesses/gdprcontrollerterms/> and <https://privacy.google.com/businesses/gdprcontrollerterms/sccs/>.

For more information on the handling of user data, please review Google's Data Privacy Declaration under: <https://policies.google.com/privacy?hl=en>.

## **8. eCommerce and payment service providers**

### **Processing of Customer and Contract Data**

We collect, process and use personal data only to the extent necessary for the establishment, content organization or change of the legal relationship (data inventory). These actions are taken on the basis of Art. 6 Sect. 1 lit. b GDPR, which permits the processing of data for the fulfilment of a contract or pre-contractual actions, and based on our legitimate interest according to Art. 6 para. 1 lit. f GDPR, Destilla has a legitimate interest in processing customer and contract data. We collect, process and use personal data concerning the use of this website (usage data) only to the extent that this is necessary to make it possible for users to utilize the services and to bill for them.

The collected customer data shall be eradicated upon completion of the order or the termination of the business relationship. This shall be without prejudice to any statutory retention mandates.

## **9. Custom Services**

### **Handling applicant data**

We offer website visitors the opportunity to submit job applications to us (e.g., via e-mail, via postal services or 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.

## **9. 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, Twitter 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).

### *Individual social networks*

#### *Facebook*

We have a profile on Facebook. The provider of this service is Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, 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](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](https://www.facebook.com/legal/EU_data_transfer_addendum) and <https://de-de.facebook.com/help/56699466033381>.

Details can be found in the Facebook privacy policy:

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

#### *Twitter*

We use the short message service Twitter. The provider is Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07, Ireland.

**You can customize your Twitter privacy settings in your user account. Click on the following link and log in:** <https://twitter.com/personalization>.



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

<https://gdpr.twitter.com/en/controller-to-controller-transfers.html>.

For details, see the Twitter Privacy Policy: <https://twitter.com/privacy>.

#### Instagram

We have a profile on Instagram. The provider of this service is Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, 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](https://www.facebook.com/legal/EU_data_transfer_addendum),  
<https://help.instagram.com/519522125107875> and <https://de-de.facebook.com/help/566994660333381>.

For details on how they handle your personal information, see the Instagram Privacy Policy: <https://help.instagram.com/519522125107875>.

#### XING

We have a profile on XING. The provider is New Work SE, Dammtorstraße 30, 20354 Hamburg, Germany. Details on their handling of your personal data can be found in the XING Privacy Policy: <https://privacy.xing.com/de/datenschutzerklaerung>.

#### 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>.