DPPP 001v0



# PRIVACY POLICY

1. An overview of data protection

## **General information**

The following information will provide you with a easy to nagate overview of what will happen with your personal dta 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 data controller)?

The data on this website is processed by the operator of the website, whose 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 analysed when you visit this website. Such analytics 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

#### **External Hosting**

This website is hosted externally. Personal data collected on this website are stored on the servers of the host. These may include, but are not limited to, OP addresses, contact requests, metadata and communications, contract information, contact information, names, web age access and other data generated through a web site. The external hosting serves the purpose of fulfilling the contract with our potential and existing customers (Art. 6(1)(b) GDPR) and in the interest of secure, fast, and efficient provision of our online

services by a professional provider (Art. 6(1)(f) GDPR). If appropriate consent has been obtained, the processing is carried out exclusively on the bais of Art. 6 91)(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.

Our host(s) will only process your data to the extent necessary to fulfil its performance obligations and to follow our instructions with respect to such data.

We are using the following host(s):

Digital Ocean: https://www.digitalocean.com/

#### Data processing

We have concluded a data processing agreement (DPA) for the use of the above-metioned service. 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: Hörmann Transdek Unit 2 Bryans Close Harworth Doncaster DN11 8RY

Phone: +44 (0) 1302 752276

E-mail: dataprotection@transdek.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 fulfilment of a contract or for the implementation of precontractual measures, we process your data on the basis of Art. 6(1)(b) GDPR. Furthermore, if your data is required for the fulfilment 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.

Jens Paul Nemesis Consulting GmbH Carl Schurz-Strasse -21-23 66953 Pirmasens E-mail: dataprotection@hoermann.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 fulfilment 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 dta 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 #9objection 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 fulfilment 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.

#### **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.

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

#### **Consent with Cookiebot**

Our website uses consent technology from Cookiebot to obtain your consent to the storage of certain

cookies on your end device or for the use of certain technologies and to document this in a data protection compliant manner. The provider of this technology is Cybot A/S, Havnegade 39, 1058 Copenhagen, Denmark (hereinafter "Cookiebot").

When you enter our website, a connection is established with the Cookiebot servers to obtain your consent and provide you with other explanations regarding the use of cookies. Cookiebot will then store a cookie in your browser to identify the consent you have given or its revocation. The data collected in this way is stored until you request us to delete it, delete the Cookiebot cookie itself or the purpose for which the data is stored no longer applies. Mandatory legal storage obligations remain unaffected.

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

## Data processing

We have concluded a data processing agreement (DPA) for the use of the above-mentioned service. 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.

## **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 precontractual 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 fulfilment 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 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) 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.

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/s/participantsearch/participantdetail? contact=true&id=a2zt00000001L5AAI&status=Active

#### **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) 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/.

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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/s/participant-
search/participantdetail?
contact=true&id=a2zt00000001L5AAI&status=Active
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#### **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.

#### 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.

## 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) 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://policies.google.com/privacy/frameworks and https://privacy.google.com/businesses/controllerterms/mccs/.

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/s/participantsearch/participantdetail? contact=true&id=a2zt00000001L5AAI&status=Active

## **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://www.google.com/settings/ads/onweb/.

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.

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/s/participantsearch/participantdetail? contact=true&id=a2zt00000001L5AAI&status=Active

#### **Google Conversion-Tracking**

This website uses Google Conversion Tracking. The provider of this service is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

With the assistance of Google Conversion Tracking, we are in a position to recognize whether the user has completed certain actions. For instance, we can analyze the how frequently which buttons on our website have been clicked and which products are reviewed or purchased with particular frequency. The purpose of this information is to compile conversion statistics. We learn how many users have clicked on our ads and which actions they have completed. We do not receive any information that would allow us to personally identify the users. Google as such uses cookies or comparable recognition technologies for identification purposes.

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.

For more information about Google Conversion Tracking, please review Google's data protection policy at: https://policies.google.com/privacy?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/s/participantsearch/participantdetail? contact=true&id=a2zt000000001L5AAI&status=Active

#### 6. Plug-ins and Tools

## **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.

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/s/participant-search/participantdetail?contact=true&id=a2zt00000001L5AAI&status=Active

## **Google reCAPTCHA**

We use "Google reCAPTCHA" (hereinafter referred to as "reCAPTCHA") on this website. The provider is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

The purpose of reCAPTCHA is to determine whether data entered on this website (e.g., information entered into a contact form) is being provided by a human user or by an automated program. To determine this, reCAPTCHA analyzes the behavior of the website visitors based on a variety of parameters. This analysis is triggered automatically as soon as the website visitor enters the site. For this analysis, reCAPTCHA evaluates a variety of data (e.g., IP address, time the website visitor spent on the site or cursor movements initiated by the user). The data tracked during such analyses are forwarded to Google.

Re CAPTCHA analyses run entirely in the background. Website visitors are not alerted that an analysis is underway.

Data are stored and analyzed on the basis of Art. 6(1)(f) GDPR. The website operator has a legitimate interest in the protection of the operator's websites against abusive automated spying and against SPAM. 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.

For more information about Google reCAPTCHA please refer to the Google Data Privacy Declaration and Terms Of Use under the following links: https://policies.google.com/privacy?hl=en and https://policies.google.com/terms?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/s/participantsearch/participantdetail? contact=true&id=a2zt00000001L5AAI&status=Active

## 7. 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 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.

#### Our social media appearances

This privacy policy applies to the following social media presence.

[https://www.facebook.com/transdek/] [https://twitter.com/transdek] [https://www.linkedin.com/company/transdek/]

#### 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 behaviour 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, 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.

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/s/participantsearch/participantdetail? contact=true&id=a2zt000000GnywAAC&status=Active

# X (formerly Twitter)

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

You can customize your X 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 X Privacy Policy: https://twitter.com/privacy.

#### 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.