



EHEDG Privacy Policy

We are delighted that you have shown interest in the EHEDG organisation. Data protection is of high priority to the management board of Stichting EHEDG (Registered Seat). The Internet pages of Stichting EHEDG can be used without any indication of personal data; however, if a data owner wants to use special member services of our website, processing of personal data might be required. If the processing of personal data is needed and there is no statutory basis for such processing, we generally obtain consent from the data owner.

The processing of personal data, such as the name, address, e-mail address, or telephone number of a data owner shall always be in-line with the General Data Protection Regulation (GDPR), and in accordance with the country-specific data protection regulations applicable to Stichting EHEDG. With this data protection declaration, we like to inform you about our general policy in respect to the nature, scope, and purpose of the personal data which we collect, use and process. Furthermore, we hereby inform the data owners about their rights in respect to the usage of their personal data.

In its control function, Stichting EHEDG has implemented numerous technical and organisational measures to ensure the most comprehensive protection of personal data processed through its website. However, internet-based data transmission occasionally might have security gaps and thus an entire protection cannot not be guaranteed. For this reason, any data owner is free to transfer his or her personal data to us by alternative means, e.g. by telephone.

1. Definitions

The data protection declaration of Stichting EHEDG is based on the terms used by the European legislation for adoption of the General Data Protection Regulation (GDPR). Our data protection declaration is intended to be legible and understandable by the public, as well as by our members and any other stakeholders. To ensure a correct understanding, the terminology used in this declaration is explained hereunder.

In this data protection declaration, we use, inter alia, the following terms:

a) Personal data

Personal data means any information relating to an identified or identifiable natural person (“data owner”). An identifiable natural person can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

b) Data owner

Data owner is any identified or identifiable natural person, whose personal data are processed by the administrator who is responsible for the processing.



c) Processing

Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as the collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

d) Restriction of processing

Restriction of processing is the marking of any stored personal data with the aim to limit their further processing.

e) Profiling

Profiling means any kind of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict the aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

f) Pseudonymisation

Pseudonymisation is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data owner without using additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

g) Administrator or administrator responsible for the processing

The administrator or administrator responsible for the processing is the natural or legal person, public authority, agency or any other body who, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purpose and means of such processing are determined by Union or Member State law, the administrator or the specific criteria for its nomination may be provided for by Union or Member State law.

h) Processor

The processor is a natural or legal person, public authority, agency or any other body who is processing personal data on behalf of the administrator.

i) Recipient

The recipient is a natural or legal person, public authority, agency or another body, to whom the personal data are disclosed, whether being a third party or not. However, public authorities receiving any personal data in the framework of a particular inquiry in accordance with the Union or Member State law shall not be considered as recipients; the processing of these data by public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.



j) Third party

A third party is a natural or legal person, public authority, agency or body other than the data owner, administrator, processor and any other person who, under the direct authority of the administrator or processor, are authorised to process the personal data.

k) Consent

Consent of the data owner is any freely given, specific, informed and unambiguous indication of the data owner's wishes by which he or she, either by a statement or by a clear affirmative action, signifies agreement to the processing of his or her personal data.

2. Name and Address of the administrator

The administrator responsible for the fulfilment of the General Data Protection Regulation (GDPR), or for any other data protection laws applicable in the Member states of the European Union and any other provisions related to data protection is:

Stichting EHEDG (Registered Seat)

Gooimeer 1
1411 DC Naarden,
The Netherlands

Email: office@ehedg.org

Website: www.ehedg.org

Phone: +31 610 216 958

3. Cookies

The internet pages of Stichting EHEDG are using cookies. Cookies are text files which are stored in a computer system via an internet browser.

Many internet sites and servers are using cookies, which often contain a so-called cookie ID. A cookie ID is a unique identifier of the cookie. It consists of a character string to assign the internet pages and servers to the specific internet browser in which the cookie was stored. This allows any visited internet sites and servers to distinguish the individual browser of the data owner from any other internet browsers that contain other cookies. A specific internet browser can be recognised and identified by using a unique cookie ID.

By using cookies, Stichting EHEDG can provide its website users a more user-friendly service which would not be available without the cookie setting.

The information on our website is user-optimized by means of cookies. As previously mentioned, cookies allow us to recognise our website users and the purpose of this recognition is to



facilitate the utilisation of our website. By setting cookies, the user e.g. does not have to enter his or her access details every time he is visiting the website, as this is taken over by the website, and the cookie is thus stored on the user's computer system. Another example is the cookie of a shopping cart in an online shop. The online store will remember the articles a customer has placed in the virtual shopping cart via a cookie.

The data owner may, at any time, refuse the setting of cookies through our website by means of a corresponding setting of the internet browser used, and may thus permanently deny the setting of cookies. Furthermore, any pre-set cookies may be deleted at any time via the internet browser or another software program. This feature is available in all common internet browsers. However, if the data owner deactivates the cookie setting in his internet browser, this may lead to a malfunction of some of our website features.

4. Collection of general data and information

The website of Stichting EHEDG collects a series of general data and information if a data owner or an automated system opens the website. These general data and information are stored in the server log files. Collected are e.g. (1) the browser type and version used, (2) the operating system used by the access system, (3) the website from which an access system reaches out to our website (so-called referrers), (4) the sub-websites, (5) the date and time of access to the internet site, (6) an internet protocol address (IP address), (7) the internet service provider of the access system, and (8) any other similar data and information that may be used in the event of an attack towards our information technology systems.

When using these general data and information, Stichting EHEDG does not draw any conclusions on the data owner hereby. This information is rather needed to (1) correctly deliver the content of our website, (2) to optimise the content of our website as well as its advertisement, (3) to ensure the long-term viability of our information technology systems and website technology, and (4) to provide law enforcement authorities with the information needed for any criminal prosecution in case of a cyber-attack. Therefore, Stichting EHEDG analyses any anonymously collected data as well as statistic information, with the aim of increasing the data protection and data security of our organisation, and to ensure a maximum level of protection for the personal data we are processing. The anonymous data of the server log files are stored separately from all other personal data provided by a data owner.

5. Website Registration

The data owner has the opportunity to register on the EHEDG website by indicating his or her personal data. The nature of the personal data transmitted to the administrator is determined by the respective input registration mask. The personal data entered by the data owner are solely collected and stored for internal use and own purposes of the administrator. The administrator may request transfer to one or more processors (e.g. to a parcel service) who are also using the personal data for internal purposes which can be attributed to the administrator.

By registration on the EHEDG website, the IP address—assigned by the internet service provider (ISP) and used by the data owner as well as the date and time of the registration are also stored. The storage of these data is solely required in view of preventing the misuse of our services, and, if necessary, to investigate on a committed offense. In so far, the data storage is also required to safeguard the administrator. The data are not passed on to any third parties,



unless there is a statutory obligation to do so, or if the transfer is required for criminal prosecution.

Data owner registration and voluntary indication of his/her personal data enable the administrator to offer contents or services to the data owner that may be only offered to registered users due to the nature of the respective matter. Registered persons are free to change their personal data submitted upon their registration at any time, or to have them completely deleted from the database of the administrator.

At any time and upon request, the data administrator shall provide information to a data owner about the purpose of his/her personal data storage. In addition, the data administrator shall correct or erase the personal data upon request or indication of the data owner, in so far as there are no statutory storage obligations. All of the administrator's staff are available as contact persons to the data owner in this respect.

6. Subscription to our newsletter

On the website of the Stichting EHEDG, users are given the opportunity to subscribe to our newsletter. The input mask used for this purpose determines which personal data are transmitted, as well as when the newsletter is ordered from the administrator.

Stichting EHEDG regularly informs its members and other stakeholders by a newsletter about its scope of activities. The newsletter will be only transmitted if (1) the data owner has indicated a valid e-mail address and (2) if he/she has registered for receipt of the newsletter. For legal reasons, a confirmation e-mail in the double opt-in procedure is sent to the e-mail address registered by a data owner before newsletter transmission. This confirmation e-mail is used to identify the owner of the e-mail address as the data owner who is authorised to receive the newsletter.

For newsletter registration, we also store the IP address of the computer system assigned by the internet service provider (ISP) and used by the data owner at the time of registration, as well as the date and time of the registration. The collection of these data is required to understand a possible misuse of the e-mail address of a data owner at a later date, and thus to also ensure legal protection of the administrator.

The personal data collected at newsletter registration will be solely used for newsletter mailings. In addition, newsletter subscribers may be informed by e-mail, as long as this is needed for the operation of the newsletter service or for a registration in question, as well as in the event of any modifications to the newsletter as such, or in case of any amendments to the technical features. Personal data collected in conjunction with the newsletter service will not be transferred to any third parties. The data owner can terminate the newsletter subscription and withdraw the agreement for storage of his/her personal data provided during registration at any time by a respective link which can be found in each newsletter. It is also possible to unsubscribe from the newsletter directly on the website of the administrator, or to communicate this intention to the administrator in another way.



7. Newsletter-Tracking

The newsletter of Stichting EHEDG contains so-called tracking pixels. A tracking pixel is a miniature graphic embedded in such newsletter e-mails, which are sent in HTML format to enable log file recording and analysis. This allows to maintain a statistical analysis about the success or failure of a newsletter mailing. Based on the embedded tracking pixel, Stichting EHEDG can track if and when an e-mail was opened by a data owner, and which links were called up.

Such personal data collected in the newsletter tracking pixels are stored and analysed by the administrator to optimise the newsletter dispatch, as well as to better adapt the contents of future newsletters to the interests of the data owner. These personal data will not be passed on to any third parties. Data owners are at entitled to withdraw at any time from the respective separate declaration of consent issued by means of the double-opt-in procedure. The personal data will be deleted by the administrator after withdrawal. An unsubscription from the newsletter is automatically considered as a withdrawal by Stichting EHEDG.

8. Website contact form

The website of Stichting EHEDG provides features to enable a quick electronic contact and direct communication with its organisation, which also includes a general e-mail address. If a data owner contacts the administrator by e-mail to the general address or via a contact form, the personal data transmitted by the data owner are automatically stored. Such personal data transmitted to the data administrator are solely stored for the purpose of processing the request or to contact the data owner. The personal data are not transferred to any third parties.

9. Routine erasure and blocking of personal data

The data administrator shall only process and store the personal data of the data owner for the period required to comply with the purpose of storage, or as far as this is granted by the European legislator or by any other laws or regulations which the administrator needs to follow. If the purpose of storage is not applicable, or upon expiry of a storage period prescribed by European legislation or by another legislator, the personal data are blocked or erased by routine in accordance to the legal requirements.

10. Rights of the data owner

a) Right of confirmation

European legislation is granting all data owners the right to request a confirmation as to whether or not their personal data are being processed by the administrator at any time. If a data owner wishes to avail himself of this right of confirmation, he or she may contact the staff of the administrator.

b) Right of access

European legislation is granting all data owners the right to obtain full insight into their personal data stored and to receive a copy of these records for information at any time. Furthermore, the



European directives and regulations are granting the data owner access to the following information:

the purpose of data processing;

the categories of personal data in question;

the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or from international organisations;

where possible, the envisaged period for which the personal data will be stored, or - if not possible - the criteria used to determine that period;

the right to request from the administrator rectification or erasure of personal data, or restriction of personal data processing concerning the data owner, or to object against such processing;

the right to submit a complaint to a supervisory authority;

any available source of information if the personal data are not directly collected from the data owner;

the existence of an automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data owner.

Furthermore, the data owner is authorized to obtain information as to whether his or her personal data are transferred to a third country or to an international organisation. If so, the data owner is authorized to learn about the appropriate safeguards relating to the transfer.

If a data owner wishes to avail himself of this right of access, he or she may, at any time, contact the administration staff.

c) Right to rectification

European legislation is granting all data owners the right to promptly obtain from the administrator a rectification about any inaccurate personal data concerning him or her. Taking the data processing purpose into account, the data owner shall have the right to have missing personal data completed, including the provision of a supplementary statement.

If a data owner wishes to make use of the right of rectification, he or she may contact the administration staff at any time.

d) Right of deletion (Right to be forgotten)

European legislation is granting all data owners the right to have his/her personal data deleted by the administration staff without undue delay, and the administrator shall have the obligation to delete any personal data promptly if one of the following reasons is applicable, and as long as there is no further processing required:



The personal data are no longer required in relation to the purpose of their collection or processing.

The data owner withdraws his/her consent for the processing based on paragraph (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and if there is no other legal reason for processing.

The data owner objects to the processing according to Article 21(1) of the GDPR and in case of no legitimate reasons which overrule the processing, or the data owner objects to the processing according to Article 21(2) of the GDPR.

The personal data have been illegally processed.

The personal data need to be erased for reasons of compliance with a legal obligation in the Union or Member State law as applicable to the administrator.

The personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

If one of the afore mentioned reasons apply, and if a data owner is requesting deletion of his/her personal data stored by Stichting EHEDG, he or she may, at any time, contact any of the EHEDG administration staff, who will make sure that the request is followed immediately.

In case of having published any personal data, the administrator is obliged to delete them according to Article 17(1), taking into account the available technology and the cost of implementation, and shall take reasonable steps including all technical measures to inform other administrators who are processing the personal data that the data owner has requested deletion, by copy or replication of those personal data, as far as their processing is not required. Any administrator of Stichting EHEDG will arrange the necessary in all individual cases.

e) Right of restricted processing

European legislation is granting all data owners the right to restrict the processing of his/her data by the administrator if one of the following applies:

The accuracy of the personal data is objected by the data owner, for a period enabling the administrator to verify correctness of the personal data.

The processing is illegal and the data owner opposes against the deletion of the personal data and requests a restriction of their use instead.

The administrator no longer needs the personal data for the purpose of processing, but they are required by the data owner for the establishment, exercise or defence of legal claims.

The data owner has objected to data processing following Article 21(1) of the GDPR pending of a verification whether the legitimate reasons of the administrator override those of the data owner.



If one of the afore mentioned reasons applies, and if a data owner is requesting a restricted processing of his/her personal data stored by Stichting EHEDG, he or she may contact at any time the administrator of Stichting EHEDG who will arrange to restrict the processing.

f) Right to data portability

European legislation is granting all data owners the right to be informed about the personal data related to him or her, which had been provided to an administrator, in a structured, commonly used and machine-readable format. He or she shall have the right to transmit these data to another administrator without being obstructed by the administrator to whom the personal data had been provided, as long as the processing is based on consent pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of an official authority who have authorized the administrator.

Furthermore, in exercising his or her right to data portability following Article 20(1) of the GDPR, the data owner shall have the right to have his/her personal data transmitted directly from one administrator to another where technically feasible, and when doing so, this should not adversely affect the rights and freedom of others.

In order to assert the right of data portability, the data owner may at any time contact any administration staff of Stichting EHEDG.

g) Right to object

European legislation is granting all data owners the right to object, for reasons relating to his or her particular situation, to the processing of his/her personal data at any time, which is based on point (e) or (f) of Article 6(1) of the GDPR. This also applies to profiling based on these provisions.

Stichting EHEDG shall no longer process the personal data in the event of an objection, unless in case of demonstrating any compelling legitimate reasons for the processing which override the interests, rights and freedom of the data owner, or for the establishment, exercise or defence of legal claims.

If Stichting EHEDG processes any personal data for direct marketing purposes, the data owner shall have the right to object at any time against the processing of his/her personal data for such reason. This also applies for profiling to the extent related to direct marketing. If the data owner objects against having his data processed for direct marketing purposes, Stichting EHEDG will no longer do so.

In addition, the data owner has the right, for reasons of his or her particular situation, to object against the processing of his/her personal data by Stichting EHEDG for scientific or historical research purposes, or for statistical purposes following Article 89(1) of the GDPR, unless the processing is required for the performance of a task carried out for reasons of public interest.

To exercise the right to object, the data owner may contact the administration of Stichting EHEDG. In addition, the data owner is free to use information society services, and not



withstanding Directive 2002/58/EC, to use his or her right to object by automated means using technical specifications.

h) Automated individual decision-making, including profiling

European legislation is granting all data owners the right of not being subject to decision solely based on automated processing, including profiling, which results in any legal effects or similarly affects him or her significantly, as long as the decision (1) is not necessary for entering into or performing of a contract between the data owner and a data administrator, or (2) is not authorised by Union or Member State law applicable for the administrator and which also lays down suitable measures to safeguard the data owner's rights, freedom and legitimate interests, or (3) is not based on the data owner's explicit consent.

If the decision (1) is necessary for entering into, or the performance of, a contract between the data owner and a data administrator, or (2) it is based on the data owner's explicit consent, Stichting EHEDG shall implement suitable measures to safeguard the data owner's rights, freedom and legitimate interests, at least the right to obtain human intervention on the part of the administrator, to express his or her point of view and contest the decision.

If the data owner wishes to exercise the rights concerning automated individual decision-making, he or she may, at any time, contact the administration of Stichting EHEDG.

i) Right to withdraw from data protection consent

European legislation is granting all data owners the right to withdraw his or her consent on processing of his or her personal data at any time.

If the data owner wishes to exercise the right to withdraw consent, he or she may, at any time, contact the administration of Stichting EHEDG.

11. Data protection provisions for the application and use of Facebook

On this website, the administrator has integrated components of the enterprise Facebook as a social network.

A social network is a place for social meetings and an internet online community, which usually allows users to communicate and interact with each other in a virtual space. A social network may serve as a platform for the exchange of opinions and experiences, or it can enable the internet community to provide personal or business-related information. Facebook allows social network users to include the creation of private profiles, upload photos, and network through request for friendship.

The operating company of Facebook is Facebook, Inc., 1 Hacker Way, Menlo Park, CA 94025, United States. If a person lives outside of the United States or Canada, the administrator is Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

With each opening of one of the individual pages of this Internet website, which is operated by the administrator and into which a Facebook component (Facebook plug-in) was integrated, the web browser on the information technology system of the data owner is automatically prompted



to download the display of the corresponding Facebook component. An overview of all the Facebook Plug-ins may be accessed on <https://developers.facebook.com/docs/plugins/>. During this technical procedure, Facebook is made aware about which specific sub-site of the EHEDG website was visited by the data owner.

If a data owner is logged in to Facebook at the same time, Facebook will detect with every call-up of the EHEDG website - and for the entire duration of the visit - which of its specific sub-sites the data owner has visited. This information is collected through the Facebook component and associated with the respective Facebook account of the data owner. If the data owner clicks onto one of the Facebook buttons integrated into the EHEDG website, like e.g. the "Like" button, or if the data owner submits a comment, Facebook will match this information with the personal Facebook user account of the data owner and will store the personal data.

Through the Facebook component, Facebook always receives information about a visit to the EHEDG website by the data owner, whenever he/she is logged in at the same time on Facebook while also visiting our website. This occurs regardless of whether the data owner clicks onto the Facebook component or not. If such an information transmission to Facebook is not desired by the data owner, he/she may prevent this by logging off from their Facebook account before calling up our website.

The data protection guideline published by Facebook on <https://facebook.com/about/privacy/>, provides information about the collection, processing and use of personal data by Facebook. In addition, it is explained in this guideline which setting options Facebook offers to protect the privacy of the data owner. In addition, different configuration options are made available to allow the elimination of data transmission to Facebook. These applications may be used by the data owner to eliminate a data transmission to Facebook.

12. Data protection provisions about the application and use of Google Analytics (with anonymisation function)

The administrator has integrated the web analytics service Google Analytics on this website (with the anonymiser function). Web analytics serves to collect, gather and analyse data about the behaviour of the website visitors. A web analysis service collects, inter alia, data about the website from which a visitor has come (the so-called referrer), which sub-pages were visited, or how often and how long a sub-page was viewed. Web analytics are mainly used for the optimisation of a website and in order to carry out a cost-benefit analysis of internet advertising.

The operator of the Google Analytics component is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, United States.

For web analytics through Google Analytics, the administrator uses the application "_gat._anonymizeIp". By means of this application the IP address of the Internet connection of the data owner is abridged by Google and anonymised when accessing our websites from a Member State of the European Union or another Contracting State to the Agreement on the European Economic Area.

The purpose of the Google Analytics component is to analyse the traffic on our website. Google uses the collected data and information, inter alia, to evaluate the use of our website and to



provide online reports, which show the activities on our websites, and to provide other services concerning the use of our internet site for us.

Google Analytics applies a cookie on the information technology system of the data owner. The definition of cookies is explained above. With the cookie setting, Google can analyse the use of our website. With each visit of one of the individual pages of this internet site, which is operated by the administrator and into which a Google Analytics component was integrated, the internet browser on the information technology system of the data owner will automatically submit data through the Google Analytics component for the purpose of online advertising and settlement of commissions to Google. During this technical procedure, the enterprise Google acquires knowledge about personal information, such as the IP address of the data owner, which serves Google, inter alia, to understand the origin of visitors and clicks, and subsequently create commission settlements.

The cookie is used to store personal information, such as the access time, the location from where access was made, and the frequency of visits on our website by the data owner. With each visit to our internet site, such personal data, including the IP address of the internet access used by the data owner, will be transmitted to Google in the United States of America. These personal data are also stored by Google in the USA. Google may pass on such personal data collected through the technical procedure to any other third parties.

The data owner may, as stated above, prevent the setting of cookies through our website at any time by means of a setting on his/her web browser used and thus permanently deny the setting of cookies. Such an adjustment to the internet browser used would also prevent Google Analytics from setting a cookie on the information technology system of the data owner. In addition, cookies already in use by Google Analytics may be deleted at any time via a web browser or by other software programs.

In addition, the data owner can object against data collection generated by Google Analytics which is related to the use of this website, as well as to the processing of these data by Google and the chance to preclude them. For this purpose, the data owner must download and install a browser add-on available from <https://tools.google.com/dlpage/gaoptout>. This browser add-on informs Google Analytics via a JavaScript that any data and information about the visits of an internet page shall not be transmitted to Google Analytics. The installation of the browser add-on is considered as an objection by Google. If the information technology system of the data owner is deleted, formatted, or newly installed at a later date, the data owner needs to reinstall the browser add-ons to disable Google Analytics. If the browser add-on was uninstalled by the data owner or by any other person who can be attributed to his/her sphere of competence, or is disabled, it is possible to execute the reinstallation or reactivation of the browser add-ons.

Further information and the applicable data protection provisions of Google may be retrieved on <https://www.google.com/intl/en/policies/privacy/> and on <http://www.google.com/analytics/terms/us.html>. Google Analytics is further explained under the following Link: <https://www.google.com/analytics/>.

13. Data protection provisions about the application and use of Google+

This website has integrated the Google+ button as a component. Google+ is a so-called social network. A social network is a social meeting place and online community on the Internet which



usually allows users to communicate with each other and to interact in a virtual space. A social network may serve as a platform for the exchange of opinions and experiences or enable the Internet community to provide personal or business-related information. Google+ allows users of the social network to include the creation of private profiles, upload photos and network through friendship requests.

The operating company of Google+ is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, UNITED STATES.

With each opening of one of the individual pages of this Internet website, which is operated by the administrator on which a Google+ button has been integrated, the web browser on the information technology system of the data owner is automatically prompted to download the display of the corresponding Google+ button component. During this technical procedure, Google is informed about the specific sub-page of our website visited by the data owner. More detailed information about Google+ is available under <https://developers.google.com/+/>.

If the data owner is logged in at the same time to Google+, Google recognizes with each opening of our website by the data owner and for the entire duration on our Internet site, which specific sub-pages were visited by the data owner. This information is collected through the Google+ button and matched with the respective Google+ account associated with the data owner.

If the data owner clicks on the Google+ button integrated on our website and thus gives a Google+ 1 recommendation, then Google assigns this information to the personal Google+ user account of the data owner and stores the personal data. Google stores the Google+ 1 recommendation of the data owner, making it publicly available in accordance to the terms and conditions accepted by the data owner in this regard. Subsequently, a Google+ 1 recommendation given by the data owner on this website together with other personal data, such as the Google+ account name used by the data owner and the stored photo, is stored and processed on other Google services, such as search-engine results of the Google search engine, the Google account of the data owner or in other places, e.g. on internet pages, or in relation to advertisements. Google is also able to link the visit to this website with other personal data stored on Google. Google further records this personal information with the purpose of improving or optimizing the various Google services.

Through the Google+ button, Google receives information that the data owner visited our website, if the data owner at the time of the call-up to our website is logged in to Google+. This occurs regardless of whether the data owner clicks or doesn't click on the Google+ button.

If the data owner does not wish to transmit personal data to Google, he or she may prevent such transmission by logging out of his Google+ account before calling up our website.

Further information and the data protection provisions of Google can be retrieved under <https://www.google.com/intl/en/policies/privacy/>. More references from Google about the Google+ 1 button may be obtained under <https://developers.google.com/+/web/buttons-policy>.



14. Data protection provisions about the application and use of LinkedIn

The administrator has integrated components of the LinkedIn Corporation on this website. LinkedIn is a web-based social network that enables users with existing business contacts to connect and to make new business contacts. Over 400 million registered people in more than 200 countries are using LinkedIn. Thus, LinkedIn is currently the largest platform for business contacts and one of the most frequently visited websites world-wide.

The operating company of LinkedIn is LinkedIn Corporation, 2029 Stierlin Court Mountain View, CA 94043, UNITED STATES. For privacy matters outside of the UNITED STATES LinkedIn Ireland, Privacy Policy Issues, Wilton Plaza, Wilton Place, Dublin 2, Ireland, is responsible.

With each call-up to one of the individual pages of this Internet site, which is operated by the administrator and on which a LinkedIn component (LinkedIn plug-in) was integrated, the internet browser on the information technology system of the data owner is automatically prompted to the download of a display of the corresponding LinkedIn component of LinkedIn. Further information about the LinkedIn plug-in may be accessed under <https://developer.linkedin.com/plugins>. During this technical procedure, LinkedIn gains knowledge of what specific sub-page of our website was visited by a data owner.

If the data owner is logged in at the same time on LinkedIn, LinkedIn detects with every call-up to our website by the data owner - and for the entire duration of their stay on our website - which specific sub-page of our Internet page was visited by the data owner. This information is collected through the LinkedIn component and is associated with the respective LinkedIn account of the data owner. If the data owner clicks on one of the LinkedIn buttons integrated on our website, LinkedIn will assign this information to the personal LinkedIn user account of the data owner and will store the personal data.

LinkedIn receives information via the LinkedIn component that the data owner has visited our website, provided that the data owner is logged in at LinkedIn at the time of the call-up to our website. This occurs regardless of whether the person clicks on the LinkedIn button or not. If such a transmission of information to LinkedIn is not desired by the data owner, he or she can prevent this by logging off from their LinkedIn account before a call-up to our website is made.

LinkedIn provides the possibility to unsubscribe from e-mail messages, SMS messages and targeted ads, as well as the ability to manage ad settings under <https://www.linkedin.com/psettings/quest-controls>. LinkedIn also uses affiliates such as Eire, Google Analytics, BlueKai, DoubleClick, Nielsen, Comscore, Eloqua, and Lotame. The setting of such cookies may be denied under <https://www.linkedin.com/legal/cookie-policy>. The applicable privacy policy for LinkedIn is available on <https://www.linkedin.com/legal/privacy-policy>. The LinkedIn Cookie Policy is available under <https://www.linkedin.com/legal/cookie-policy>.

15. Data protection provisions about the application and use of Twitter

On this website, the administrator has integrated components of Twitter. Twitter is a multilingual, publicly-accessible microblogging service on which users may publish and spread so-called 'tweets,' e.g. short messages, which are limited to 280 characters. These short messages are public to everyone, including those who are not logged on to Twitter. The tweets are also displayed to so-called followers of the respective user. Followers are other Twitter users who



follow the tweets of a user. Furthermore, Twitter allows to address a wide audience via hashtags, links or retweets.

The operating company of Twitter is Twitter, Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, UNITED STATES.

With each call-up to one of the individual pages of this internet site, which is operated by the administrator and on which a Twitter component (Twitter button) was integrated, the internet browser on the information technology system of the data owner is automatically prompted to download a display of the corresponding Twitter component of Twitter. Further information about the Twitter buttons is available under <https://about.twitter.com/de/resources/buttons>. During this technical procedure, Twitter gains knowledge about which specific sub-page of our website was visited by the data owner. The purpose of the integration of the Twitter component is a retransmission of the contents of this website to allow our users to introduce this web page to the digital world and increase our visitor numbers.

If the data owner is logged in at the same time on Twitter, Twitter detects with every call-up to our website by the data owner and for the entire duration of their stay on our Internet site which specific sub-page of our internet page was visited by the data owner. This information is collected through the Twitter component and associated with the respective Twitter account of the data owner. If the data owner clicks on one of the Twitter buttons integrated on our website, then Twitter assigns this information to the personal Twitter user account of the data owner and stores the personal data.

Twitter receives information via the Twitter component that the data owner has visited our website, provided that the data owner is logged in on Twitter at the time of the call-up to our website. This occurs regardless of whether the person clicks on the Twitter component or not. If such a transmission of information to Twitter is not desirable for the data owner, then he or she may prevent this by logging off from their Twitter account before a call-up to our website is made.

The data protection provisions of Twitter can be found on <https://twitter.com/privacy?lang=en>.

16. Data protection provisions about the application and use of Xing

On this website, the administrator has integrated components of XING. XING is an Internet-based social network that enables users to connect with existing business contacts and to create new business contacts. The individual users can create a personal profile of themselves at XING. Companies may, e.g. create company profiles or publish jobs on XING.

The operating company of XING is XING SE, Dammtorstraße 30, 20354 Hamburg, Germany.

With each call-up to one of the individual pages of this Internet site, which is operated by the administrator and on which a XING component (XING plug-in) was integrated, the Internet browser on the information technology system of the data owner is automatically prompted to download a display of the corresponding XING component of XING. Further information about the XING plug-in may be accessed under <https://dev.xing.com/plugins>. During the course of this technical procedure, XING gains knowledge of what specific sub-page of our website was visited by the data owner.



If the data owner is logged in at the same time on XING, XING detects with every call-up to our website by the data owner and for the entire duration of their stay on our Internet site which specific sub-page of our Internet page was visited by the data owner. This information is collected through the XING component and associated with the respective XING account of the data owner. If the data owner clicks on the XING button integrated on our Internet site, e.g. the "Share"-button, then XING assigns this information to the personal XING user account of the data owner and stores the personal data.

XING receives information via the XING component that the data owner has visited our website, provided that the data owner is logged in at XING at the time of the call to our website. This occurs regardless of whether the person clicks on the XING component or not. If such a transmission of information to XING is not desirable for the data owner, then he or she can prevent this by logging off from their XING account before a call-up to our website is made.

The data protection provisions published by XING, which is available under <https://www.xing.com/privacy>, provide information on the collection, processing and use of personal data by XING. In addition, XING has published privacy notices for the XING share button under https://www.xing.com/app/share?op=data_protection.

17. Data protection provisions about the application and use of YouTube

On this website, the administrator has integrated components of YouTube. YouTube is an Internet video portal that enables video publishers to set video clips and other users free of charge, which also provides free viewing, review and commenting on them. YouTube allows you to publish all kinds of videos, so you can access both full movies and TV broadcasts, as well as music videos, trailers, and videos made by users via the Internet portal.

The operating company of YouTube is YouTube, LLC, 901 Cherry Ave., San Bruno, CA 94066, UNITED STATES. The YouTube, LLC is a subsidiary of Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, UNITED STATES.

With each call-up to one of the individual pages of this Internet site, which is operated by the administrator and on which a YouTube component (YouTube video) was integrated, the Internet browser on the information technology system of the data owner is automatically prompted to download a display of the corresponding YouTube component. Further information about YouTube may be obtained under <https://www.youtube.com/yt/about/en/>. During the course of this technical procedure, YouTube and Google gain knowledge of what specific sub-page of our website was visited by the data owner.

If the data owner is logged in on YouTube, YouTube recognizes with each call-up to a sub-page that contains a YouTube video, which specific sub-page of our Internet site was visited by the data owner. This information is collected by YouTube and Google and assigned to the respective YouTube account of the data owner.

YouTube and Google will receive information through the YouTube component that the data owner has visited our website, if the data owner at the time of the call to our website is logged in on YouTube; this occurs regardless of whether the person clicks on a YouTube video or not. If such a transmission of this information to YouTube and Google is not desirable for the data



owner, the delivery may be prevented if the data owner logs off from their own YouTube account before a call-up to our website is made.

YouTube's data protection provisions, available at <https://www.google.com/intl/en/policies/privacy/>, provide information about the collection, processing and use of personal data by YouTube and Google.

18. Legal basis for the processing

Art. 6(1) lit. a GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose. If the processing of any personal data is required for the performance of a contract with the data owner as a party, as e.g. in case of processing operations required for the supply of goods or for the provision of any other services, the processing is based on Article 6(1) lit. b GDPR. The same applies for the processing operations needed to carry out any pre-contractual measures, for example in case of inquiries concerning our products or services. If our organisation is legally obliged to fulfil its duties which require the processing of any personal data, such as the fulfilment of tax obligations, the processing is based on Art. 6(1) lit. c GDPR. In a few cases, the processing of personal data may be required to protect the vital interests of the data owner or of another natural person. This would e.g. hold true if a visitor was injured in relation to our organisation and his name, age, health insurance data or any other vital information would have to be passed on to a doctor, hospital or other third parties. In this case the processing would be based on Art. 6(1) lit. d GDPR. Finally, the processing operations could be based on Article 6(1) lit. f GDPR. This legal basis is used for processing operations which are not covered by any of the above-mentioned legal reasons, if processing is necessary for the purposes of the legitimate interests pursued by our organisation or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data owner which require protection of personal data. Such processing operations are permissible as they have been specifically mentioned by the European legislator, taking into consideration that a legitimate interest could be presumed if the data owner is a client of the administrator (Recital 47 Sentence 2 GDPR).

19. The legitimate interests pursued by the administrator or by a third party

Where the processing of personal data is based on Article 6(1) lit. f GDPR, our legitimate interest is to carry out our business in favour of the well-being of all staff, members and other stakeholders.

20. Period for which the personal data will be stored

The criteria used to determine the period of personal data storage is the respective statutory retention period. After expiration of that period, the corresponding data will be deleted as a routine, as long as they are no longer required for the fulfilment of a contract or the initiation of a contract.



21. Provision of personal data as a statutory or contractual requirement; Requirement needed to enter into a contract; Obligation of the data owner to provide the personal data; possible consequences of failure to provide such data

We clarify that the provision of personal data is partly required by law (e.g. tax regulations), or that it can also result from contractual provisions (e.g. information on the contractual partner). Sometimes it might be required to conclude a contract with the data owner including his/her personal data, which must subsequently be processed by us. The data owner is, for example, obliged to provide us with his/her personal data if our organisation signs a contract with him or her. If such data are not submitted, the contract with the data cannot be concluded consequently. Before any personal data are provided by the data owner, he/she will be in direct contact with us, and our administration will clarify whether the provision of the personal data is required by law or if it is necessary for the conclusion of the contract including any consequences of a non-provision of the personal data.

22. Existence of automated decision-making

As an organisation aware of its responsibility, we do not use an automatic decision-making or profiling.

This Privacy Policy has been generated by the Privacy Policy Generator of the German Association for Data Protection that was developed in cooperation with Privacy Lawyers from WILDE BEUGER SOLMECKE, Cologne.

This extended EHEDG Privacy Statement has come into effect on 1 May 2018.