

## **Privacy Policy**

### 1. An overview of data protection

#### **General information**

The following information will provides you with an easy to understand overview of what will happens with your personal information when you visit this website. The term "personal information" incudes any information that can be used to personally identify you. For more information on the subject matter of data protection, refer to our Data Protection Statement0, which we have included at the bottom of this copy.

#### Data collection on this website

• Who is the responsible party for the collection of data on this website (i.e., the "controller")?

The data on this website is processed by the operator of the website, whose contact details can be fount in the "Information about the responsible party (referred to GDPR as the "controller") section of this privacy policy.

- How do we collect your information? We collect your information as a result of you providing it to us. For example, this may be information that you enter into our contact form. Other information is collected by our IT systems automatically or with your consent during your visit to our website. This data is primaraily technical information (e.g. web browser, operating system or time of access to the site). This information is collected automatically when you access this website.
   What do we use your information for?
- What do we use your information for?
  Some of the information is generated to ensure the error-free delivery of the website.

Other information may be used to analyse your usage patterns.

#### • What rights do you have regarding your information?

You have the right to be informed at any time, free of charge, of the source, recipients and purposes of the processing of your archived personal data. You also have the right to request that your data be corrected or deleted. If you have consented to data processing, you have the right to withdraw your consent at any time, with effect for all future data processing. You also have the right to request that the processing of your data be restricted in certain circumstances. You also have the right to lodge a complaint with the competent supervisory authority.

Please do not hesitate to contact us at any time if you have any questions about this or any other privacy issue.

#### Analysis tools and third-party tools

It is possible that your browsing behaviour may be statistically analysed when you visit this website. Such analysis is primarily carried out using what we call analytics programs. For more information about these analytics programs, please see our privacy policy below.



### 2. Hosting

#### **External Hosting**

This website is hosted by an external service provider (host). Personal information collected on this website is stored on the Host's servers. This may include, but is not limited to, IP addresses, contact requests, metadata and communications, contractual information, contact information, names, web page accesses, and other data generated by a website.

The host is used for the purpose of fulfilling the contract with our potential and existing customers Art. 6(1) (b) GDPR) and in the interest of the secure, fast, and efficient provision of our online services by a professional provider (Art. 6(1) (f) GDPR). If consent has been given, the processing will be carried out exclusively on the basis of Art. 6(1) (a) GDPR and § 25 (1) TTDSG, insofar as the consent includes the storage of cookies or the access to information in the user's terminal equipment (e.g., device fingerprinting) within the meaning of the TTDSG. This consent may be revoked at any time.

Our host will only process your data to the extent necessary to fulfil its performance obligations and to follow our instructions in relation to such data.

We are using the following host:

domainfactory GmbH Oskar-Messter-Str. 33 85737 Ismaning Deutschland

#### **Data processing**

We have entered into a Data Processing Agreement (DPA) with the above provider. This is a contract, required by data protection legislation, which ensures that they only process personal data of visitors to our website on our behalf and in accordance 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. Therefore, your personal information will be treated confidentially and in accordance with data protection legislation and this privacy policy.

When you use this website, a variety of personal information is collected. Personal information is information that can be used to personally identify you. This privacy policy explains what information we collect and the purposes for which we use that information. It also explains how and for what purpose the information is collected.

You should be aware that there are inherent security risks in transmitting data, such as emails, over the Internet. It is not possible to completely protect data from access by third parties.



#### Information about the responsible party (referred to as the "controller" in the GDPR)

The data processing controller on this website is:

MFI GmbH Hirschmann-Ring 13 71726 Benningen Phone: 07144806180 E-mail: <u>datenschutz@mfi-lb.de</u>

The controller is the natural or legal person who, alone or jointly with others, makes decisions about the purposes and means of processing personal data (e.g. names, e-mail addresses, etc.).

#### Storage duration

Unless a longer retention period is specified in this Privacy Policy, we will retain your personal information until the purpose for which it was collected no longer applies. If you make 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, deletion will take place after these reasons cease to apply.

#### General information about the legal basis of the data processing on this website

If you have consented to data processing, we will process your personal data on the basis of Art. 6 (1) (a) GDPR or Art. 9 (2) (a) GDPR, if special categories of data according to Art. 9 (1) DSGVO. If you have consented to the storage of cookies or the access to information in your terminal (e.g. via device fingerprinting), the data processing is additionally based on § 25 (1) TTDSG. You may withdraw your consent at any time. If your data is required for the fulfilment of a contract or for the implementation of pre-contractual measures, we process your data on the basis of Art. 6(1) (b) GDPR. Furthermore, if your data is required for the fulfilment of a legal obligation, we process it on the basis of Art. 6(1) (c) GDPR. In addition, the data processing may be based on our legitimate interest pursuant to Art. 6(1) (f) GDPR.

Please refer to the following paragraphs of this Privacy Policy for information on the applicable legal basis.

#### Designation of a data protection officer

We have appointed a Data Protection Officer for our company.

CTM-COM GmbH In den Leppsteinswiesen 14 64380 Roßdorf Phone: 06154 57605-0 E-mail: <u>datenschutz@ctm-com.de</u>



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

Among other things, we use tools provided by companies based in the United States and other non-EU countries that are less secure from a data protection perspective. When these tools are active, your personal data may be transferred to and processed in these non-EU countries. Please be aware that these countries may not provide a level of data protection comparable to that in the EU. For example, U.S. companies are required to share personal information with the security authorities and you, as the data subject, have no recourse in a court of law. Therefore, it cannot be ruled out that U.S. agencies (e.g. the Secret Service) may process, analyse and permanently archive your personal data for surveillance purposes. We have no control over these processing activities.

#### Revocation of your consent to the processing of data

A wide range of data processing activities are only possible with your explicit consent. You may also at any time revoke any consent you have already given to us. This will not affect the lawfulness of any data collection that occurred prior to your revocation.

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

In the event that data are processed on the basis of Art. 6 (1) (e) or (f) GDPR, you have the right to at any time object to the processing of your personal data based on grounds arising from your unique situation. This also applies to any profiling based on 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 in 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 processed for direct marketing purposes, you have the right to object at any time to the processing of your personal data for such marketing purposes. This also applies to the creation of profiles in connection with such direct marketing. If you object, your personal data will no longer be used for direct marketing purposes (objection pursuant to Art. 21 (2) GDPR).

#### Right to register a complaint with the competent supervisory authority

In the event of a breach of the GDPR, data subjects have the right to log a complaint with a supervisory authority, in particular in the Member State where they have their habitual residence, place of work or where the alleged breach occurred. The right to lodge a complaint is independent of any other administrative or judicial procedure available as a legal remedy.



#### **Right to data portability**

You have the right to request that we provide you or a third party with any data that we process automatically on the basis of your consent or for the performance of a contract, in a commonly used machine-readable format. If you ask for the data to be transferred directly to another controller, we will only do so where this is technically possible.

#### SSL and/or TLS encryption

For security reasons and to protect the transmission of confidential content, such as orders or enquiries that you send to us as the website operator, this website uses either an SSL or a TLS encryption programme. You can recognise an encrypted connection by checking whether the address bar of the browser changes from "http://" to "https://" and also by the appearance of the lock icon in the browser bar.

When SSL or TLS encryption is enabled, the data you send to us cannot be read by third parties.

#### Access, rectification and erasure of data

In accordance with applicable law, you have the right at any time to request information about your archived personal data, its origin and recipients, as well as the purpose of the processing of your data. You may also have the right to have your data corrected or deleted. If you have any questions about this or any other matter relating to personal data, please do not hesitate to contact us.

#### **Right to request processing restrictions**

You have the right to request restrictions on the processing of your personal data. You can contact us at any time. The right to request the imposition of restrictions applies in the following cases:

- If you dispute the accuracy of your information that we hold, it will usually take us some time to investigate. While this investigation is underway, you have the right to request that we restrict the processing of your personal data.
- If the processing of your personal data was/is carried out in an unlawful manner, you have the right to request the restriction of the processing of your data instead of requesting the erasure of this data.
- If we no longer need your personal data and you need it to exercise, defend or assert legal claims, you have the right to request that we restrict the processing of your personal data instead of deleting it.
- If you have made an objection under Art. 21(1) GDPR, your rights and our rights must be weighed against each other. As long as it has not been determined whose interests prevail, you have the right to request a restriction of the processing of your personal data.

If you have restricted the processing of your personal data, such data may be processed except for archiving - only if you have consented or in order to establish, exercise or defend legal claims or protect the rights of another natural or legal person, or for important public interest reasons justified by the European Union or a Member State of the European Union.



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

We hereby object to the use of the contact data published in the context of the obligatory data in the imprint to send us advertising and information material which we have not expressly requested. The operators of this website and its pages expressly reserve the right to take legal action in the event of unsolicited promotional information, such as SPAM messages.

### 4. Data collection on this website

#### Cookies

Our websites and pages use what are known in the industry as "cookies". Cookies are small text files that do not damage your device. They are either temporarily stored for the duration of a session (session cookies) or permanently archived on your device (persistent cookies). Session cookies are automatically deleted when you end your visit. Persistent cookies remain stored on your device until you actively delete them or your web browser automatically deletes them.

In some cases, third party cookies may be stored on your device when you visit our site (third party cookies). These cookies enable you or us to take advantage of certain services offered by the third party (e.g. cookies for processing payment services).

Cookies serve a variety of purposes. Many cookies are technically essential, as certain website functions would not work without them (e.g. the shopping basket function or the display of videos). Other cookies may be used to analyse user patterns or to display advertising messages. Cookies that are necessary for the execution of electronic communication transactions or for the provision of certain functions you wish to use (e.g. for the shopping cart function), or those that are necessary for the optimisation (necessary cookies) of the website (e.g. cookies that provide measurable insights into the web audience), are used on the basis of Art. 6(1) (f) GDPR, unless another legal basis is provided. The operator of the website has a legitimate interest in storing the necessary cookies in order to ensure the technically faultless and optimised provision of the operator's services. If your consent to the storage of cookies and similar identification technologies has been requested, the processing will only take place on the basis of the consent obtained (Article 6(1)(a) GDPR and Section 25(1) TTDSG); this consent may be revoked at any time. You have the option of setting your browser to notify you whenever a cookie is placed and to only accept cookies in certain cases. You can also disable the acceptance of cookies in certain cases or generally, or enable the delete function to automatically delete cookies when the browser is closed. If cookies are disabled, the functionality of this website may be limited.

Where third party cookies are used, or where cookies are used for analytical purposes, we will notify you separately in conjunction with this Privacy Policy and ask for your consent where appropriate.

#### **Consent with Cookiebot**

Our website uses consent technology from Cookiebot to obtain your consent to the storage of certain cookies on your device or the use of certain technologies and to document this in a privacy compliant manner. The provider of this technology is Cybot A/S, Havnegade 39, 1058



Copenhagen, Denmark (hereinafter referred to as "Cookiebot"). When you visit our website, a connection is established with Cookiebot's servers to obtain your consent and to provide you with further explanations regarding the use of cookies. Cookiebot will then place a cookie in your browser to identify your consent or revocation. The data collected in this way will be stored until you request us to delete it, the Cookiebot cookie itself is deleted or the purpose for which the data was stored no longer applies. Mandatory legal retention requirements 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.

#### **Contact form**

If you send us an enquiry via our contact form, we will store the information you provide in the form and any contact details you provide in the form in order to process your enquiry and in the event that we have any further queries. We will not share this information without your consent. The processing of this data is based on Art. 6(1) (b) GDPR, if your request is related to the execution of a contract or if it is necessary to carry out pre-contractual measures. In all other cases, the processing is based on our legitimate interest in the effective processing of the requests made to us (Art. 6(1) (f) GDPR) or on your consent (Art. 6(1) (a) GDPR), if this has been requested. The information you have entered in the contact form will be kept by us until you ask us to delete it, revoke your consent to its storage, or if the purpose for which the information is stored no longer exists (e.g. after we have completed our response to your enquiry). This is without prejudice to any mandatory legal requirements, in particular retention periods.

#### Request by email, phone or fax

If you contact us by e-mail, telephone or fax, we will store and process your enquiry, including any resulting personal data (name, enquiry), for the purpose of dealing with your enquiry. We will not pass on this information without your consent.

These data will be processed on the basis of Art. 6(1)(b) GDPR if your request is related to the performance of a contract or is necessary for the performance of pre-contractual measures. In all other cases, the data will be 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 such consent has been obtained. The data you send us in the context of contact requests will remain with us until you ask us to delete it, you revoke your consent to its storage or the purpose for which it was stored no longer applies (e.g. after completion of your request). Mandatory legal provisions - in particular statutory retention periods - remain unaffected.

#### **Hubspot CRM**

We use Hubspot CRM on this site. The provider is Hubspot Inc. 25 Street, Cambridge, MA 02141 USA (hereinafter referred to Hubspot CRM). Hubspot CRM enables us, among other things, to manage existing and potential customers and customer contacts, to communicate with you, and to plan and execute marketing activities based on your interests. Hubspot CRM allows us to collect, sort and analyse customer interactions via email, social media or phone across multiple channels. The personal data collected in this way can be analysed and used to communicate with the potential customer or for marketing purposes (e.g. newsletters).



Hubspot CRM also allows us to track and analyse the user behaviour of our contacts on our website. The use of Hubspot CRM is based on Art. 6(1) (f) GDPR. The website operator has a legitimate interest in the most efficient customer management and communication. If the appropriate consent has been obtained, the processing is based solely on Art. 6(1) (a) GDPR and § 25 (1) TTDSG, insofar as the consent includes the storage of cookies or access to information in the user's terminal equipment (e.g. device fingerprinting) within the meaning of the TTDSG. This consent may be revoked at any time.

Please see Hubspot's privacy policy for details: <u>https://legal.hubspot.com/de/privacy-policy</u>.

The transfer of ata to the US is based on the standard contractual clauses of the EU Commission. Details can be found at <u>https://www.hubspot.de/data-privacy/privacy-shield</u>.

### 5. Social media

#### Our social media presence

We maintain publicly available profiles on social networking sites. The individual social networking sites we use are listed below.

Social networking sites such as Facebook, Twitter, etc. are generally able to comprehensively analyse your user behaviour when 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 sites, a number of privacy related processing operations are triggered. In detail:

If you are logged in to your social media account and visit our social media site, the operator of the social media site may associate your visit with your user account. Under certain circumstances, your personal information may be collected even if you are not logged in or do not have an account with the social media portal in question. In this case, the information may be collected through cookies stored on your device or by logging your IP address.

The data collected in this way can be used by social media sites to create user profiles that store your preferences and interests. This allows you to 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 or have been logged into.

Please also note that we are not able to track all processing on the social media sites. Depending on the provider, additional processing may be carried out by the operators of the social media portals. Details can be found in the terms of use and privacy policies of the respective social media portals.

#### Legal basis

Our social media presence is designed to 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 other legal bases to be specified by the operators of the social networks (e.g. consent within the meaning of Art. 6 (1) lit. a) GDPR).



#### **Responsibility and Enforcement**

If you visit one of our social media sites (e.g. Facebook), we are jointly responsible with the operator of the social media platform for the data processing operations triggered during this visit. In principle, you can protect your rights (information, correction and deletion, restriction of processing, data portability and complaint) both with us and with the operator of the relevant social media portal (e.g. Facebook).

Please note that although we share responsibility with the operators of social media portals, we do not have full control over the data processing practices of social media portals. Our ability to do so is limited by the corporate policies of each provider.

#### Storage time

The data collected directly by us through the social media presence will be deleted from our systems as soon as you ask us to delete it, you revoke your consent to its storage or the purpose for its storage no longer applies. Stored cookies will remain on your device until you delete them. Mandatory legal provisions - in particular retention periods - remain unaffected.

We have no control over the retention period of your data, which is retained by the social network operators for their own purposes. For details, please contact the social network operator directly (e.g. in their privacy policy, see below).

#### Individual social networks

#### Facebook

We have a profile on Facebook. The service is provided by Facebook Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. According to Facebook, the data collected is also transferred to the USA and other third countries.

You can customise your advertising preferences from within your account.

Click on the following link and log in: https://www.facebook.com/settings?tab=ads. Data transfers to the US are based on the European Commission's Standard Contractual Clauses (SCC). Details can be found at

https://www.facebook.com/legal/EU\_data\_transfer\_addendum and https://dede.facebook.com/help/566994660333381.

Please see Facebook's privacy policy for details: <u>https://www.facebook.com/about/privacy/.</u>

#### Instagram

We have a profile on Instagram. This service is provided by Facebook Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

Data transfers to the US are based on the European Commission's Standard Contractual Clauses (SCC). Details can be found here: https://www.facebook.com/legal/EU\_data\_transfer\_addendum, https://help.instagram.com/519522125107875 and https://dede.facebook.com/help/566994660333381.



For details on how they handle your personal information, please see Instagram's privacy policy: <u>https://help.instagram.com/519522125107875</u>.

#### LinkedIn

We have a LinkedIn profile. It is provided by LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland. LinkedIn uses advertising cookies.

If you would like to opt our of LinkedIn advertising cookies, please use the following link: <u>https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out</u>. Data transfer to the US are based on the European Commision's Standard Contractual Clauses (SCC). Details can be found here: <u>https://www.linkedin.com/legal/l/dpa</u> and <u>https://www.linkedin.com/legal/l/eu-sccs</u>.

For details on how they handle your personal information, please see LinkedIn's privacy policy: <u>https://www.linkedin.com/legal/privacy-policy</u>.

#### YouTube

We have a profile on YouTube. It is provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. Details of how they handle your personal information can be found in YouTube's privacy policy: <u>https://policies.google.com/privacy?hl=en</u>.

#### LinkedIn plug-in

This website uses features of the LinkedIn network. The provider is LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland.

Every time you access a page on this site that includes LinkedIn features, a connection is made to LinkedIn's servers. LinkedIn is notified that you have visited this website with your IP address. If you click on the "Recommend" button on LinkedIn and are logged into your LinkedIn account at the time, LinkedIn will be able to associate your visit to this website with your user account. Please note that we, as the provider of the websites, have no knowledge of the content of the transmitted data and its use by LinkedIn.

The use of the LinkedIn plugin is based on Art. 6(1) (f) GDPR. The operator of the website has a legitimate interest in being as visible as possible on social media. If the appropriate consent has been obtained, the processing is based solely on Art. 6(1) (a) GDPR and § 25(1) TTDSG, insofar as the consent includes the storage of cookies or access to information in the user's terminal equipment (e.g. device fingerprinting) within the meaning of the TTDSG. This consent may be revoked at any time.

Data transfers to the US are based on the European Commision's Standard Contractual Clauses (SCC). Details can be found here: <u>https://www.linkedin.com/help/linkedin/answer/62538/datenubertragung-aus-der-eu-dem-ewr-und-derschweiz?lang=en</u>.

For more information, please see the LinkedIn privacy statement at <u>https://www.linkedin.com/legal/privacy-policy</u>.



### 6. Analysis tools and advertising

#### **Google Analytics**

This website uses features of the web analytics service Google Analytics. This service is provided by Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

Google Analytics enables the website operator to analyse the behaviour of visitors to the website. For this purpose, the website operator receives a variety of user data, such as the pages visited, the time spent on the page, the operating system used and the user's country of origin. This information is aggregated into a user ID and associated with the user's device. Google Analytics also allows us to track your mouse and scroll movements and clicks, among other things. Google Analytics uses a variety of modelling approaches to enrich the data collected and uses machine learning technologies to analyse the data. Google Analytics uses technologies that recognise users for the purpose of analysing user behaviour patterns (e.g. cookies or device fingerprinting). The information generated by the cookie about your use of the website is transferred to and stored by Google on servers in the United States.

This analysis tool is based on Art. 6(1) (f) GDPR. The operator of this website has a legitimate interest in analysing user behaviour in order to optimise both the services offered online and the operator's advertising activities. If the appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6(1) (a) of the GDPR and § 25 (1) of the TTDSG, insofar as the consent includes the storage of cookies or the access to information in the user's terminal equipment (e.g. device fingerprinting) in the sense of the TTDSG. This consent may be revoked at any time.

Data transfer to the US are based on the European Commission's Standard Contractual Clauses (SCC). Details can be found here: https://privacy.google.com/businesses/controllerterms/mccs/.

#### **Browser plug-in**

You may refuse the use of cookies by downloading and installing the browser plugin from <u>https://tools.google.com/dlpage/gaoptout?hl=en</u>.

For more information about how Google Analytics handles user data, please see Google's privacy policy at <u>https://support.google.com/analytics/answer/6004245?hl=en</u>.

#### Demographic parameters provided by Google Analytics

This website uses the 'demographic' feature of Google Analytics to serve relevant ads to website visitors within the Google advertising network. This allows reports to be generated that include information about the age, gender and interests of website visitors. The sources of this information are Google's interest-based advertising and visitor data obtained from third parties. This information is not personally identifiable. You can opt out of this feature at any time by changing your ads preferences in your Google account, or you can generally opt out of having your data collected by Google Analytics as described in the "Opting out of data collection" section.



### 7. Newsletter

#### Newsletter data

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

#### Mailjet

This website uses Mailjet to send out newsletters. This service is provided by Mailgun Technologies Inc., 112 E Pecan Sr. #1135, San Antonio, Texas 78205, USA. Mailjet is a service that, among other things, organises and analyses the sending of newsletters. The information you provide to receive the newsletter is stored on Mailjet's servers.

#### Data analysis by Mailjet

Mailjet allows us to analyse our newsletter campaigns. For example, we can see whether a newsletter message has been opened and which links have been clicked. This allows us to see which links were clicked on the most. We can also see if certain pre-defined actions were taken after opening/clicking (conversion rate). For example, we can see if you made a purchase after clicking on the newsletter. Mailjet also allows us to group newsletter recipients into different categories (clusters). For example, newsletter recipients can be grouped by age, gender or location. This allows you to tailor your newsletters more closely to your target groups. If you do not want Mailjet to analyse you, you must unsubscribe from the newsletter. You will find a link to unsubscribe in each newsletter message. You can also unsubscribe directly from the website.

For detailed information on the features of Mailjet, please click on the following link: <u>https://www.mailjet.de/funktion/</u>. Mailjet's privacy policy can be found at <u>https://www.mailjet.de/sicherheit-datenschutz/</u>.

#### Legal Basis

Data processing is based on your consent (Art. 6(1) (a) GDPR). You may withdraw your consent at any time. Revocation does not affect the lawfulness of any data processing that has already taken place. The transfer of data to the US is based on the EU Commission's standard contractual clauses. Details can be found here: <u>https://www.mailjet.de/av-vertrag/</u>.

#### Storage period

The data provided to us for the purpose of subscribing to the newsletter will be stored by us until you unsubscribe from the newsletter or the newsletter service provider and will be deleted from the newsletter distribution list when you unsubscribe from the newsletter. Data stored by us for other purposes remains unaffected. After you unsubscribe from the newsletter, your email address may be added to a blacklist by us or the newsletter service provider if such action is necessary to prevent future mailings. The data from the blacklist will only be used for this purpose and will not be merged with other data. This serves both your interest and our interest in complying with legal requirements when sending newsletters



(legitimate interest as defined by Art. 6(1)(f) GDPR). The blacklist is kept for an indefinite period. You may object to the storage if your interests outweigh our legitimate interest.

### 8. Plug-ins and Tools

#### YouTube with enhanced privacy integration

Our website embeds videos from the YouTube website. The website is operated by Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland. We use YouTube in an enhanced privacy mode. According to YouTube, this mode ensures that YouTube does not store any information about visitors to this website before they view the video. However, this does not necessarily mean that YouTube's enhanced privacy mode does not share information with YouTube's partners. For example, regardless of whether you are watching a video, YouTube will always connect to the Google DoubleClick network. As soon as you start playing a YouTube video on this website, a connection to YouTube's servers is established. This tells the YouTube server which of our pages you have visited. If you are logged into your YouTube account when you visit our site, you allow YouTube to associate your browsing behavior directly with your personal profile. You can prevent this by logging out of your YouTube account.

In addition, after you start watching a video, YouTube may place various cookies on your device or use similar recognition technologies (e.g., device fingerprinting). This allows YouTube to obtain information about visitors to this website. Among other things, this information is used to generate video statistics to improve the site's usability and to prevent fraud. In certain circumstances, once you start playing a YouTube video, additional data processing transactions may be triggered over which we have no control. Our use of YouTube is based on our interest in presenting our online content in an attractive manner. Pursuant to Art. 6(1) (f) GDPR, this is a legitimate interest. If consent has been obtained, the processing is based solely on Art. 6(1) (a) GDPR and § 25(1) TTDSG, insofar as the consent includes the storage of cookies or access to information in the user's terminal equipment (e.g. device fingerprinting) within the meaning of the TTDSG. This consent may be revoked at any time.

For more information about how YouTube handles user information, please see the YouTube Privacy Policy at <u>https://policies.google.com/privacy?hl=en</u>.

#### Google Web Fonts (local embedding)

This website uses web fonts provided by Google to ensure the consistent use of fonts on this site. These Google fonts are installed locally, so this application does not connect to Google's servers. For more information about Google web fonts, please follow this link: <a href="https://developers.google.com/fonts/faq">https://developers.google.com/fonts/faq</a> and read Google's privacy policy at: <a href="https://developers.google.com/privacy?hl=en">https://developers.google.com/fonts/faq</a> and read Google's privacy policy at:



#### Google Maps

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

In order to enable the use of Google Maps features, your IP address must be stored. This information is usually transferred to one of Google's servers in the USA, where it is archived. The operator of this website has no control over the transfer of data. If Google Maps is enabled, Google may use Google web fonts to ensure a consistent display of fonts. When you access Google Maps, your browser will load the necessary web fonts into your browser cache in order to display text and fonts correctly. We use Google Maps to present our online content in an attractive manner and to make it easy to find the locations listed on our website. This constitutes a legitimate interest within the meaning of Art. 6(1) (f) GDPR. If the appropriate consent has been obtained, the processing is carried out solely on the basis of Art. 6(1) (a) GDPR and § 25(1) TTDSG, insofar as the consent includes the storage of cookies or access to information in the user's terminal equipment (e.g. device fingerprinting) within the meaning of the TTDSG. This consent may be revoked at any time.

Data transfers to the US are based on the European Commission's Standard Contractual Clauses (SCC). Details can be found here: <u>https://privacy.google.com/businesses/gdprcontrollerterms/</u> and <u>https://privacy.google.com/businesses/gdprcontrollerterms/sccs/</u>.

For more information about Google's handling of user information, please see the Google Privacy Policy at <u>https://policies.google.com/privacy?hl=en</u>.

#### Google reCAPTCHA

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

The purpose of reCAPTCHA is to determine whether data entered into this website (e.g. information entered into a contact form) is provided by a human user or by an automated programme. To determine this, reCAPTCHA analyses the behaviour of website visitors based on a number of parameters. This analysis is triggered automatically when the website visitor enters the site. For this analysis, reCAPTCHA evaluates a variety of data (e.g. IP address, time spent on the website by the visitor or cursor movements initiated by the user). The data collected by this analysis is sent to Google. ReCAPTCHA analysis runs completely in the background. Site visitors will not be notified that an analysis is taking place.

Data will be stored and analysed on the basis of Art. 6(1) (f) GDPR. The website operator has a legitimate interest in protecting its websites from abusive automated spying and SPAM. If the appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6(1) (a) GDPR and § 25(1) TTDSG, provided that the consent includes the storage of cookies or access to information in the user's terminal equipment (e.g. device fingerprinting) within the meaning of the TTDSG. This consent may be revoked at any time.

For more information about Google reCAPTCHA, please see the Google Privacy Policy and Terms of Use at <u>https://policies.google.com/privacy?hl=en</u> and <u>https://policies.google.com/terms?hl=en</u>.



### 9. Online-audio and video conferencing (Conference Tools)

#### **Data processing**

We use online conferencing tools to communicate with our customers. The tools we use are detailed below. When you communicate with us via video or audio conferencing over the Internet, your personal information is collected and processed by the provider of the conferencing tool and by us. The conferencing tools collect any information that you provide or access to use the tools (email address and/or your phone number).

In addition, conferencing tools process the duration of the conference, the start and end (time) of participation in the conference, the number of participants and other "contextual information" related to the communication process (metadata). In addition, the provider of the tool processes all technical data necessary for the processing of the online communication. This includes, in particular, IP addresses, MAC addresses, device IDs, device type, operating system type and version, client version, camera type, microphone or speaker and connection type. When content is exchanged, uploaded or otherwise made available within the Tool, it will also be stored on the Tool provider's servers. Such content includes, but is not limited to, cloud recordings, chat/instant messages, voicemail uploaded photos and videos, files, whiteboards and other information shared while using the service.

Please note that we do not have complete control over the data processing procedures of the tools used. What we can do is largely determined by the policies of the tools themselves. You can find more information about data processing by the conference tools in the privacy statements of the tools used, which we have listed below this text.

#### Purpose and legal bases

The conference tools are used to communicate with potential or existing contractual partners or to offer certain services to our customers (Art. 6(1) (b) GDPR). In addition, the use of the tools serves to generally simplify and accelerate communication with us or our company (legitimate interest within the meaning of Art. 6(1) (f) GDPR). Where consent has been requested, the tools in question will be used on the basis of such consent, which may be revoked at any time with effect from that time.

#### **Duration of storage**

Information that we collect directly through the video and conferencing tools will be deleted from our systems as soon as you request deletion, revoke your consent to storage, or the reason for storage no longer applies. Stored cookies will remain on your device until you delete them. Mandatory legal retention periods remain unaffected.

We have no control over how long your data is retained by the conference tool providers for their own purposes. Please contact the conference tool providers directly for details.

#### **Conference tools used**

We use the following conferencing tools:



#### TeamViewer

We use TeamViewer. The provider is TeamViewer Germany GmbH, Jahnstr. 30, 73037 Göppingen. Details on data processing can be found in the TeamViewer privacy policy: <u>https://www.teamviewer.com/en/privacy-policy/</u>.

#### **Microsoft Teams**

We use Microsoft Teams. The provider is Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA. For details on data processing, please see the Microsoft Teams privacy statement: <u>https://privacy.microsoft.com/en-us/privacystatement</u>.

### **10. Custom Services**

#### **Job Applications**

We offer website visitors the opportunity to submit job applications to us (e.g. by email, by post or by completing an online application form). Below we explain the scope, purpose and use of the personal data collected from you in connection with the application process. We assure you that the collection, processing and use of your data will be in accordance with applicable data protection laws and all other legal requirements, and that your data will always be treated as strictly confidential.

#### Scope and purpose of the collection of data

If you apply for a job with us, we will process the associated personal data (e.g. contact and communication data, application documents, notes from interviews, etc.) if they are required for a decision on the establishment of an employment relationship. The legal basis for the aforementioned is § 26 GDPR according to German law (negotiation of an employment relationship), Art. 6(1) (b) GDPR (general contract negotiations) and - if you have given us your consent - Art. 6(1) (a) GDPR. You may withdraw your consent at any time. Within our company, your personal data will only be shared with people who are involved in processing your application. Should your application lead to your employment, your personal data will be processed in accordance with § 26 GDPR 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 an offer of employment, or if you reject an offer of employment or withdraw your application, we reserve the right to retain the data you have provided on the basis of our legitimate interests (Article 6(1) (f) GDPR) for up to 6 months from the end of the application process (rejection or withdrawal of the application). The data will then be deleted and the physical application documents destroyed. In particular, the data will be retained as evidence in the event of litigation. If it is obvious that the data will be needed after the 6-month period has expired (e.g. due to an imminent or pending legal dispute), the data will only be deleted when the purpose for further storage no longer applies. Longer storage may also take place if you have given your consent (Article 6(1) (a) GDPR), or if statutory data retention requirements preclude deletion.



#### Admission to the applicant pool

If we do not make you an offer of employment, you may be able to join our candidate pool. If you are accepted, all documents and information from your application will be added to the pool so that we can contact you if any suitable vacancies arise. Admission to the candidate pool is based solely on your express consent (Art. 6(1) (a) GDPR). Your consent to be included in the pool is voluntary and has no bearing on the current application process. You may withdraw your consent at any time. In this case, the data will be irrevocably deleted from the applicant pool, unless there are legal reasons for retaining it.

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

### **11. Modification of this privacy policy**

This policy is current and was last updated on December 2021.

As our websites and offerings evolve, or as legal or regulatory requirements change, it may become necessary to amend this Privacy Policy. You can view and print the current privacy policy at any time by visiting <u>https://www.mfi-innovations.com/en/privacy-policy</u>.