## **Data Protection Declaration**

## 1. Introduction

We would like to use the information below to provide you "data subject" with an overview of our processing of your personal data and your rights under data protection law. It is generally possible to use our website without entering personal data. However, if you wish to make use of special services offered by our company through our website, it may be necessary to process personal data. If it is necessary to process personal data and there is no legal basis for such processing, we will generally obtain your consent.

Personal data, such as your name, address or email address, is always processed in accordance with the EU General Data Protection Regulation (GDPR) and in accordance with the country-specific data protection regulations applicable to the "Siteco GmbH". The aim of this Privacy Notice is to inform you about the scope and purpose of the personal data we collect, use and process.

As the data controller, we have implemented numerous technical and organisational measures to ensure the most complete possible protection of the personal data processed via this website. Nevertheless, Internet-based data transmissions can in principle have security gaps so that absolute protection cannot be guaranteed. For this reason, you are free to submit personal data on alternative ways, such as by phone or by post to us.

## 2. Data controller

The data controller, as defined by the GDPR, is:

Siteco GmbH Georg-Simon-Ohm-Strasse 50, 83301 Traunreut, Germany

Phone: +49 8669 33-0 Fax: +49 8669 33-397 Email: info@siteco.de

Data controller's representative: Ralph Hesse

## 3. Data protection officer

You can reach the data protection officer as follows:

Franz Obermayer complimant AG Edt 4 84558 Kirchweidach, Germany Tel.: +49 8623 98739-40 E-Mail: <u>datenschutz@complimant.de</u> Website: www.complimant.de

You may contact our data protection officer directly at any time if you have any questions or suggestions regarding data protection.

## 4. Technology

#### 4.1 SSL/TLS encryption

This site uses SSL or TLS encryption to **ensure** the security of data processing and to protect the transmission of confidential content, such as orders, login details or contact requests that you send to us as the website operator. You can recognise an encrypted connection by your browser?s address bar reading "https://" instead of "http://" and the lock symbol in the browser bar.

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

#### 4.2 Data collection when visiting the website

If you only use our website for informational purposes, i.e. if you do not register or otherwise provide us with information, we only collect the data your browser sends our server (in what is known as "server log files"). Our website collects a range of general data and information each time you access a website or an automated system. This general data and information is stored in the server?s log files. It may be collected

- 1. the types and versions used,
- 2. the operating system used by the accessing system,
- 3. the website from which an accessing system accesses our website (called a referrer),
- 4. the sub-pages accessed via an accessing system on our website,
- 5. the date and time the website is accessed,
- 6. a truncated internet protocol address (anonymised IP address) and
- 7. the accessing system's internet service provider.

No conclusions are drawn about you when using this general data and information. Instead, this information is needed

- 1. to properly deliver our website content,
- 2. to optimise the content of our website as well as to advertise it,
- 3. to ensure the continued functioning of our IT systems and our website's technology

4. as well as to provide the information necessary for law enforcement authorities to prosecute in the event of a cyber attack.

This collected data and information is therefore statistically analysed and further analysed by us with the aim of increasing data protection and data security within our company to ultimately ensure an optimum level of protection for the personal data being processed by us. The anonymous data from the server log files is stored separately from all personal data provided by a data subject.

The legal basis for data processing is Article 6 Paragraph 1 Sentence 1(f) GDPR. Our legitimate interest is based on the purposes listed above for the collection of data.

## 5. Transfer of data to third parties

Your personal data will not be transferred to third parties for purposes other than those listed below.

We only pass on your personal data to third parties if:

- 1. you have given your express consent pursuant to Art. 6 Para. 1 sentence 1 (a) GDPR,
- 2. disclosure is permissible under Art. 6 Para. 1 sentence 1 (f) GDPR in order to safeguard our legitimate interests and there is no reason to assume that you have an overriding interest worthy of protection in not disclosing your data,
- 3. in the event that there is a legal obligation for disclosure under Article 6 (1) sentence 1 (c) of the GDPR, and
- 4. this is legally permissible and, according to Art. 6 para. 1 sentence 1 (b) GDPR, is necessary for the processing of contractual relationships with you.

## 6. Cookies

#### 6.1 General information about cookies

We use cookies on our website. Cookies are small files that are automatically created by your browser and stored on your IT system (laptop, tablet, smartphone, etc.) when you visit our website. Cookies do not cause any damage to your end device, do not contain viruses, Trojans or other malware.

Information is stored in the cookie, which arises in connection with the specifically used terminal device. This does not mean, however, that we obtain direct knowledge of your identity.

The use of cookies serves on the one hand to make the use of our offer more pleasant for you. For example, we use session cookies to detect whether you have already visited individual pages on our website. These are automatically deleted when you leave our website.

Furthermore, we also use temporary cookies to optimize user-friendliness, which are stored on your end device for a certain fixed period of time. If you visit our site again to use our services, it is automatically recognized that you have already been with us and which entries and settings you have made so that you do not have to enter them again.

On the other hand, we use cookies in order to record the use of our website statistically and evaluate it for the purpose of optimizing our offer for you. These cookies enable us to automatically recognize that you have already been with us when you visit our site again. These cookies are automatically deleted after a defined period of time.

The data processed by cookies is required for the above-mentioned purposes in order to safeguard our legitimate interests and those of third parties in accordance with Art. 6 Para. 1 S. 1(f) GDPR.

Most browsers accept cookies automatically. However, you can configure your browser so that no cookies are stored on your computer or so that a message always appears before a new cookie is created. However, completely deactivating cookies may mean that you will not be able to use all the functions of our website.

## 7. Contents of our website

#### 7.1 Registering as a user

You have the option to register on our website by providing personal data.

Which personal data is transmitted to us in the process is determined by the respective input mask used for registration. The personal data you enter is collected and stored exclusively for internal use by us and for our own purposes. We may arrange for the transfer to one or more processors, such as a parcel service provider, who will also use the personal data solely for an internal use attributable to us.

When you register on our website, the IP address assigned by your Internet Service Provider (ISP), the date and time of registration are also stored. The storage of this data takes place against the background that this is the only way to prevent the misuse of our services and, if necessary, to enable the clarification of criminal offenses committed. Insofar the storage of this data is necessary for our protection. In principle, this data is not passed on to third parties unless there is a legal obligation to pass it on or it is used for criminal prosecution.

Your registration with voluntary provision of personal data also enables us to offer you content or services which, by their very nature, can only be offered to registered users. Registered persons are free to change the personal data provided during registration at any time or to have them completely deleted from our database.

On request, we will provide you with information at any time about what personal data about you is stored. Furthermore, we will correct or delete personal data at your request, insofar as this does not conflict with any statutory storage obligations. A data protection officer named in this data protection declaration and all other employees are available to the data subject as contacts in this connection.

The processing of your data is done in the interest of a comfortable and easy use of our website. This constitutes a legitimate interest within the meaning of Art. 6(1)(f) GDPR.

#### 7.2 Contact/contact form

In the context of contacting us (e.g. via contact form or e-mail) personal data is collected. Which data is collected in the case of a contact form can be seen from the respective contact form. These data are stored and used exclusively for the purpose of answering your request or for contacting you and the associated technical administration. The legal basis for processing the data is our legitimate interest in responding to your request in accordance with Art. 6 Para. 1 (f) GDPR. If your contact is aimed at the conclusion of a contract, an additional legal basis for the processing is Art. 6(1)(b) of the GDPR. Your data will be deleted after final processing of your enquiry, this is the case if it can be concluded from the circumstances that the matter in question has been conclusively clarified and provided that there are no legal storage obligations to the contrary.

#### 7.3 Application management/job exchange

We collect and process the personal data of applicants for the purpose of processing the application procedure. The processing may also be carried out by electronic means. This is particularly the case if an applicant submits appropriate application documents to us electronically, for example by e-mail or via a web form on the website. If we conclude an employment contract with an applicant, the transmitted data will be stored for the purpose of processing the employment relationship in compliance with the statutory provisions. If we do not conclude an employment contract with the applicant, the applicant, the application documents are automatically deleted two months after notification of the rejection decision, provided that no

other justified interests on our part stand in the way of deletion. Other justified interests in this sense include, for example, a duty to provide evidence in proceedings under the General Equal Treatment Act (AGG).

In this respect, data processing takes place solely on the basis of our legitimate interest in accordance with Art. 6 Para. 1(f) GDPR.

### 8. Newsletters

#### 8.1 Marketing newsletter

On our website you have the possibility to subscribe to the newsletter of our company. Which personal data is transmitted to us when ordering the newsletter is determined by the input mask used for this purpose.

We inform our customers and business partners at regular intervals by means of a newsletter about our offers. The newsletter of our company can only be received by you if

- 1. You have a valid email address and
- 2. You register to receive the newsletter.

For legal reasons, a confirmation e-mail will be sent to the e-mail address you entered for the first time for sending the newsletter using the double opt-in procedure. This confirmation e-mail is used to check whether you, as the owner of the e-mail address, have authorized the receipt of the newsletter.

When you register for the newsletter, we also save the IP address assigned by your Internet service provider (ISP) for the IT system you are using at the time of registration and the date and time of registration. The collection of this data is necessary in order to be able to trace the (possible) misuse of your e-mail address at a later date and therefore serves as a legal safeguard.

The personal data collected during registration for the newsletter is used exclusively for sending our newsletter. In addition, subscribers to the newsletter could be informed by e-mail if this is necessary for the operation of the newsletter service or for registration, as could be the case if there are changes to the newsletter offer or if technical conditions change. The personal data collected within the scope of the newsletter service will not be passed on to third parties. The subscription to our newsletter can be canceled by you at any time. The consent to the storage of personal data, which you have given us for the newsletter dispatch, can be revoked at any time. For the purpose of revoking the consent, a corresponding link can be found in every newsletter. Furthermore, it is also possible at any time to unsubscribe from the newsletter directly on our website or to inform us of this in another way.

The legal basis for data processing for the purpose of sending the newsletter is Art. 6 Paragraph 1 (a) GDPR.

## 9. Web analytics

#### 9.1 Google Analytics

On our websites we use Google Analytics, a web analysis service of Google Ireland Limited (https://www.google.de/intl/de/about/) (Gordon House, Barrow Street, Dublin 4, Ireland; hereinafter "Google"). In this context, pseudonymized user profiles are created and cookies (see point "Cookies") are used. The information generated by the cookie about your use of this website such as

- 1. Browser type/version,
- 2. Operating system used,
- 3. Referrer URL (previously visited pages),
- 4. Host name of the accessing computer (IP address),
- 5. Time of the server request,

are transmitted to a Google server in the USA and stored there. The information is used to evaluate the use of the website, to compile reports on the website activities and to provide further services associated with the use of the website and the Internet for the purposes of market research and the design of these Internet pages in line with requirements. This information may also be transferred to third parties if this is required by law or if third parties process this data on our behalf. Under no circumstances will your IP address be merged with other data from Google. The IP addresses are made anonymous, so that an assignment is not possible (IP masking).

You may refuse the use of cookies by selecting the appropriate settings on your browser, however, please note that if you do this you may not be able to use the full functionality of this website.

You have given your consent to this via our opt-in cookie banner in accordance with Art. 6 Para. 1 (a) GDPR.

You can also prevent the collection of data generated by the cookie and related to your use of the website (including your IP address) and the processing of this data by Google by downloading and installing a browser add-on (https://tools.google.com/dlpage/gaoptout?hl=de).

As an alternative to the browser add-on, especially for browsers on mobile devices, you can also prevent the collection by Google Analytics by clicking on the following link: Deactivate Google Analytics An opt-out cookie is set to prevent future collection of your information when you visit this website. The opt-out cookie is only valid in this browser and only for our website and is stored on your device. If you delete the cookies in this browser, you must set the opt-out cookie again.

Further information on data protection in connection with Google Analytics can be found in the Google Analytics help (https://support.google.com/analytics/answer/6004245?hl=de).

## 10. Advertising

#### 10.1 Google (AdWords) Remarketing

Our website uses the functions of Google AdWords Remarketing, hereby we advertise this website in the Google search results, as well as on third party websites. The provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("Google"). For this purpose, Google sets a cookie in the browser of your end device, which automatically enables interest-based advertising using a pseudonymous cookie ID and based on the pages you visit.

You have given your consent to this via our opt-in cookie banner in accordance with Art. 6 Para. 1 (a) GDPR.

Any further processing will only take place if you have consented to Google linking your web and app browsing history to your Google Account and using information from your Google Account to personalize ads you view on the web. If you are logged into Google while visiting our website, Google will use your data together with Google Analytics data to create and define target group lists for cross-device remarketing. To this end, your personal data will be temporarily linked by Google with Google Analytics data to form target groups.

You can permanently disable the setting of cookies for ad preferences by downloading and installing the browser plug-in available at the following link: www.google.com/settings/ads/onweb/

Alternatively, you can contact the Digital Advertising Alliance at www.aboutads.info to find out how to set cookies and to adjust your settings. Finally, you can set your browser so that you are informed about the setting of cookies and decide individually about their acceptance or exclude the acceptance of cookies for certain cases or generally. If cookies are not accepted, the functionality of our website may be limited.

Google Ireland Limited, headquartered in Ireland, is certified for the us European Privacy Shield, which ensures compliance with the level of data protection applicable in the EU.

Further information and the privacy policy regarding advertising and Google can be found here: <a href="http://www.google.com/policies/technologies/ads/">www.google.com/policies/technologies/ads/</a>

#### 10.2 Optimize (A/B Testing Tool)

Our website also uses Google Optimize. Google Optimize analyzes the use of different variants of our website and helps us to improve the user-friendliness according to the behavior of our users on the website. Google Optimize is a tool integrated into Google Analytics. Google Tag Manager is also a Google product that allows us to manage website tags from one interface. The Tag Manager is a cookieless domain and does not collect any personal data. The tool triggers other tags, which in turn may collect data. Google Tag Manager does not access this data. If disabled at the domain or cookie level, it will remain disabled for all tracking tags implemented with Google Tag Manager. If you do not wish to receive interest-based advertising, you can disable Google's use of cookies for these purposes by visiting the page support.google.com/ads/answer/7395996.

#### 11. Plugins and other services

#### 11.1 YouTube (videos)

We have integrated components from YouTube on this website. YouTube is an internet video portal that allows video publishers to post video clips for free and other users to view, rate and comment on them free of charge. YouTube allows the publication of all types of videos, which is why complete film and television broadcasts as well as music videos, trailers or videos created by users themselves can be accessed via the Internet portal.

The operating company for YouTube is: YouTube, LLC, 901 Cherry Ave., San Bruno, CA 94066, USA. YouTube, LLC is a subsidiary of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

Each time you call up one of the individual pages of this website, which is operated by us and on which a YouTube component (YouTube video) has been integrated, the Internet browser on your IT system is automatically prompted by the respective YouTube component to download a display of the corresponding YouTube component from YouTube. Further information about YouTube can be found at www.youtube.com/yt/about/de/. As part of this technical process, YouTube and Google are informed which specific subpage of our website you are visiting.

If the person concerned is logged on to YouTube at the same time, YouTube recognizes which specific page of our website you are visiting by calling up a subpage containing a YouTube video. This information is collected by YouTube and Google and associated with your YouTube account.

YouTube and Google receive information via the YouTube component that you have visited our website if you are logged in to YouTube at the same time when you access our website, regardless of whether you click on a YouTube video or not. If you do not want this information to be sent to YouTube and Google, you can prevent the transmission by logging out of your YouTube account before you access our website.

You have given your consent to this via our opt-in cookie banner in accordance with Art. 6 Para. 1 (a) GDPR.

The privacy policy published by YouTube, which is available at www.google.de/intl/de/policies/privacy/, provides information about the collection, processing and use of personal data by YouTube and Google.

# 12. Data Protection Declaration in accordance with Art. 13 GDPR

The protection of personal data is an important concern for Siteco GmbH. Siteco GmbH therefore processes your personal data in accordance with the regulations of the European General Data Protection Regulation (GDPR) and other applicable legal regulations for the protection of personal data and for data security.