# **Privacy policy**

# Name and address of the person responsible

The responsible party within the meaning of the General Data Protection Regulation and other national data protection laws of the member states as well as other data protection regulations is:

Commsolid GmbH Am Brauhaus 12 01099 Dresden

Telephone number: +49 351 219 48 800 E-mail address: info@commsolid.com

# Contact to the data protection officer

The data protection officer and the data controller can be contacted at the following email address:

E-mail: datenschutzbeauftragter@commsolid.com

# General information on data processing

# Scope of the processing of personal data

As a matter of principle, we process personal data of our users only to an extent that it is necessary for the provision of a functional website as well as our contents and services. The processing of personal data of our users is regularly only carried out with the consent of the user. An exception applies in those cases in which it is not possible to obtain prior consent for actual reasons and the processing of the data is permitted by legal regulations.

#### Legal basis for the processing of personal data

Insofar as we obtain the consent of the data subject for processing operations involving personal data, Article 6 (1) (a) of the EU General Data Protection Regulation (GDPR) serves as the legal basis.

When processing personal data that is necessary for the performance of a contract to which the data subject is a party, Art. 6 (1) (b) DSGVO serves as the legal basis. This also applies to processing operations that are necessary for the performance of pre-contractual measures.

If processing of personal data is necessary for compliance with a legal obligation to which our company is subject, Art. 6 (1) c DSGVO serves as the legal basis.

If processing is necessary to protect a legitimate interest of our company or a third party and their interests, fundamental rights and freedoms of the data subject do not outweigh the first-mentioned interest, Art. 6 (1) lit. f DSGVO serves as the legal basis for the processing.

## Data deletion and storage period

The personal data of the data subject will be deleted or blocked as soon as the purpose of storage ceases to apply. Storage may also take place if this has been provided for by the European or national legislator in Union regulations, laws or other provisions to which the controller is subject. Data will also be blocked or deleted if a storage period prescribed by the aforementioned standards expires, unless there is a necessity for the continued storage of the data for the conclusion or fulfillment of a contract.

#### Note on data transfer to the USA

Among other things, tools from companies based in the USA are integrated on our website. If these tools are active, your personal data may be transferred to the US servers of the respective companies. We would like to point out that the USA is not a safe third country in the sense of EU data protection law. US companies are obliged to hand over personal data to security authorities without you as a data subject being able to take legal action against this. It can therefore not be ruled out that US authorities (e.g. intelligence services) process, evaluate and permanently store your data for surveillance purposes. We have no influence on these processing activities.

# Provision of the website and creation of log files

# a) Description and scope of data processing

Each time our website is accessed, our system automatically collects data and information from the computer system of the accessing computer.

The following data is collected:

- Information about the browser type and the version used.
- The user's operating system
- The user's internet service provider
- The IP address of the user
- Date and time of access
- Websites from which the user's system accesses our website
- Websites that are accessed by the user's system via our website

This data is also stored in the log files of our system. This data is not stored together with other personal data of the user.

#### b) Legal basis for data processing

The legal basis for the temporary storage of the data and the log files is Art. 6 para. 1 lit. f) DSGVO.

# c) Purpose of the data processing

The temporary storage of the IP address by the system is necessary to enable delivery of the website to the user's computer. For this purpose, the user's IP address must remain stored for the duration of the session.

The storage in log files is done to ensure the functionality of the website. In addition, we use the data to optimize the website and to ensure the security of our information technology systems. An evaluation of the data for marketing purposes does not take place in this context.

These purposes are also our legitimate interest in data processing according to Art. 6 Para. 1 lit. f) DSGVO.

#### d) Duration of storage

The data is deleted as soon as it is no longer required to achieve the purpose for which it was collected. In the case of the collection of data for the provision of the website, this is the case when the respective session has ended.

In the case of storage of data in log files, this is the case after seven days at the latest. Storage beyond this period is possible. In this case, the IP addresses of the users are deleted or alienated so that an assignment of the calling client is no longer possible.

#### e) Possibility of objection and removal

The collection of data for the provision of the website and the storage of the data in log files is absolutely necessary for the operation of the website. Consequently, there is no possibility for the user to object.

# Use of cookies

#### Description and scope of data processing

Our website uses cookies. Cookies are text files that are stored in the internet browser or by the internet browser on the user's computer system. When a user calls up a website, a cookie may be stored on the user's operating system. This cookie contains a characteristic string of characters that enables the browser to be uniquely identified when the website is called up again. We also use cookies on our website that enable an analysis of the user's surfing behavior.

The user data collected in this way is pseudonymised by technical precautions. Therefore, it is no longer possible to assign the data to the calling user. The data is not stored together with other personal data of the user.

When calling up our website, users are informed by a so-called cookie layer about the use of cookies for analysis purposes.

# Cookiebot

We use functions of the provider Cookiebot on our website. The company behind Cookiebot is Cybot A/S, Havnegade 39, 1058 Copenhagen, DK. Cookiebot offers us, among other things, the possibility to provide you with a comprehensive cookie notice (also called cookie banner or cookie notice). By using this function, data from you can be sent to Cookiebot or Cybot, stored and processed.

If you allow cookies, the following data will be transmitted to Cybot, stored and processed:

- IP address (in anonymised form, the last 3 digits are set to 0).
- Date and time of consent
- User agent of the end user's browser.
- The URL from which the consent was sent.
- An anonymous, random and encrypted key.
- The consent status of the end user, which serves as proof of consent.

The key and consent status are also stored in the end user's browser in the cookie "CookieConsent" so that the website can automatically read and follow the end user's consent in all subsequent page requests and future end user sessions for up to 12 months. The key is used for proof of consent and an option to check that the consent status stored in the end user's browser is unchanged from the original consent submitted to Cybot.

For more information, please refer to Cybot's privacy policy:

https://www.cookiebot.com/de/privacy-policy/

#### YouTube

#### a) Scope of the processing of personal data

Our website uses plugins from the YouTube site operated by Google. The operator of the pages is YouTube, LLC, 901 Cherry Ave, San Bruno, CA 94066, USA. YouTube is a subsidiary of Google.

When you visit one of our pages equipped with a YouTube plugin, your browser automatically connects to the YouTube or Google servers. In the process, various data are transferred (depending on the settings). Google Ireland Limited (Gordon House, Barrow Street Dublin 4, Ireland) is responsible for all data processing in Europe. If you are logged into your YouTube account, you enable YouTube to assign your surfing behaviour directly to your personal profile. You can prevent this by logging out of your YouTube account.

Further information on the handling of user data can be found in YouTube's privacy policy at: https://www.google.de/intl/de/policies/privacy.

# b) Legal basis for the processing of personal data

The legal basis for the processing of users' personal data is Art. 6 para. 1 lit. a) DSGVO.

#### c) Purpose of data processing

YouTube is used in the interest of an appealing presentation of our online offers.

#### d) Duration of storage

Google stores the collected data for different periods of time. You can delete some data at any time, others are automatically deleted after a limited period of time and still others are stored by Google for a longer period of time.

#### e) Possibility of objection and removal

In principle, you can manually delete data in your Google account. With the automatic deletion function of location and activity data introduced in 2019, information is stored depending on your decision - either 3 or 18 months and then deleted.

# Rights of the data subject

If personal data is processed by you, you are a data subject within the meaning of the GDPR and you are entitled to the following rights vis-à-vis the controller:

- Right to information
- Right to rectification
- Right to restriction of processing
- Right to deletion
- Right to information
- Right to data portability
- Right to object