

# Privacy Policy

## Preamble

With the following privacy policy we would like to inform you which types of your personal data (hereinafter also abbreviated as " data") we process for which purposes and in which scope. The privacy statement applies to all processing of personal data carried out by us, both in the context of providing our services and in particular on our websites, in mobile applications and within external online presences, such as our social media profiles (hereinafter collectively referred to as "online services").

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## Controller

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**Legal Notice:** <http://shalimehra.com/Get-in-touch/>

## Overview of processing operations

The following table summarises the types of data processed, the purposes for which they are processed and the concerned data subjects.

### Categories of Processed Data

- Inventory data (e.g. names, addresses).
- Content data (e.g. text input, photographs, videos).
- Contact data (e.g. e-mail, telephone numbers).
- Meta/communication data (e.g. device information, IP addresses).
- Usage data (e.g. websites visited, interest in content, access times).
- Location data (Data that indicates the location of the end device of an end user).
- Contract data (e.g. contract object, duration, customer category).
- Payment Data (e.g. bank details, invoices, payment history).

### Categories of Data Subjects

- Business and contractual partners.
- Prospective customers.
- Communication partner (Recipients of e-mails, letters, etc.).
- Customers.

- Users (e.g. website visitors, users of online services).

## **Purposes of Processing**

- Conversion Tracking.
- Office and organisational procedures.
- Cross-Device Tracking (Device-independent processing of user data for marketing purposes).
- Direct marketing (e.g. by e-mail or postal).
- Interest-based and behavioral marketing.
- contact requests and communication.
- Profiling (Creating user profiles).
- Remarketing.
- Web Analytics (e.g. access statistics, recognition of returning visitors).
- Security measures.
- Targeting (e.g. profiling based on interests and behaviour, use of cookies).
- Contractual services and support.
- Managing and responding to inquiries.
- Custom Audiences (Selection of relevant target groups for marketing purposes or other output of content).

## **Legal Bases for the Processing**

In the following we inform you about the legal basis of the General Data Protection Regulation (GDPR), on the basis of which we process personal data. Please note that,

in addition to the regulations of the GDPR, the national data protection regulations may apply in your country or in our country of residence or domicile.

- **Consent (Article 6 (1) (a) GDPR)** - The data subject has given consent to the processing of his or her personal data for one or more specific purposes.
- **Performance of a contract and prior requests (Article 6 (1) (b) GDPR)** - Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- **Compliance with a legal obligation (Article 6 (1) (c) GDPR)** - Processing is necessary for compliance with a legal obligation to which the controller is subject.
- **Legitimate Interests (Article 6 (1) (f) GDPR)** - Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

## Security Precautions

We take appropriate technical and organisational measures in accordance with the legal requirements, taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, in order to ensure a level of security appropriate to the risk.

The measures include, in particular, safeguarding the confidentiality, integrity and availability of data by controlling physical and electronic access to the data as well as access to, input, transmission, securing and separation of the data. In addition, we have established procedures to ensure that data subjects' rights are respected, that data is erased, and that we are prepared to respond to data threats rapidly. Furthermore, we take the protection of personal data into account as early as the development or selection of hardware, software and service providers, in accordance with the principle of privacy by design and privacy by default.

## Transmission and Disclosure of Personal Data

In the context of our processing of personal data, it may happen that the data is transferred to other places, companies or persons or that it is disclosed to them. Recipients of this data may include, for example, payment institutions within the context of payment transactions, service providers commissioned with IT tasks or providers of services and content that are embedded in a website. In such a case, the legal requirements will be respected and in particular corresponding contracts or

agreements, which serve the protection of your data, will be concluded with the recipients of your data.

## Use of Cookies

"Cookies" are small files that are stored on the user's devices. Different data can be stored within the cookies. The information can include, for example, the language settings on a website, the login status, a shopping cart or the point to which a video was viewed.

In general, cookies are also used when the interests of users or their behaviour (e.g. viewing certain content, use of functions, etc.) are secured via individual websites in a user profile. These profiles are used, for example, to display ads to users that correspond to their potential interests. This procedure is also referred to as "tracking", meaning tracking the potential interests of users. The term "cookies" also includes other technologies that perform the same functions as cookies (e.g. when user information is stored using pseudonymous online identifiers, also referred to as "user IDs").

If we use cookies or "tracking" technologies, we will inform you about this in our privacy policy.

**Information on Legal basis:** The legal basis on which we process your personal data with the help of cookies depends on whether we ask you for your consent. If this is the case and you accept the use of cookies, the legal basis for processing your data is your declared consent. Otherwise, the data processed with the help of cookies will be processed on the basis of our legitimate interests (e.g., in a business operation of our online services and their improvement) or if the use of cookies is necessary to fulfill our contractual obligations.

**Withdrawal of consent and objection (Opt-Out):** Irrespective of whether processing is based on consent or legal permission, you have the option at any time to object to the processing of your data using cookie technologies or to revoke consent (collectively referred to as "opt-out").

You can initially explain your objection using the settings of your browser, e.g. by deactivating the use of cookies (which may also restrict the functionality of our online services).

An objection to the use of cookies for online marketing purposes can be raised for a large number of services, especially in the case of tracking, via the US website <http://www.aboutads.info/choices/> or the EU website <http://www.youronlinechoices.com/> or generally on <http://optout.aboutads.info>.

Further information on the possibility of opposition is also given to Se in the context of the information on the respective processing operations in this privacy policy.

**Processing Cookie Data on the Basis of Consent:** Before we process or have processed data within the context of the usage of cookies, we ask the users for their consent, which can be revoked at any time. Before the consent has not been given, we may use cookies that are necessary for the operation of our online services. Their use is based on our interest and the user's interest in the expected functionality of our online services.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

## Commercial Services

We process data of our contractual and business partners, e.g. customers and interested parties (collectively referred to as "contractual partners") within the context of contractual and comparable legal relationships as well as associated actions and communication with the contractual partners or pre-contractually, e.g. to answer inquiries.

We process this data in order to fulfil our contractual obligations, safeguard our rights and for the purposes of the administrative tasks associated with this data and the business-related organisation. We will only pass on the data of the contractual partners within the scope of the applicable law to third parties insofar as this is necessary for the aforementioned purposes or for the fulfilment of legal obligations or with the consent of the contractual partners (e.g. telecommunications, transport and other auxiliary services as well as subcontractors, banks, tax and legal advisors, payment service providers or tax authorities). The contractual partners will be informed about further processing, e.g. for marketing purposes, as part of this privacy policy.

Which data are necessary for the aforementioned purposes, we inform the contracting partners before or in the context of the data collection, e.g. in on-line forms by special marking (e.g. colors), and/or symbols (e.g. asterisks or the like), or personally.

We delete the data after expiry of statutory warranty and comparable obligations, i.e. in principle after expiry of 4 years, unless the data is stored in a customer account or must be kept for legal reasons of archiving (e.g., as a rule 10 years for tax purposes). In the case of data disclosed to us by the contractual partner within the context of an assignment, we delete the data in accordance with the specifications of the assignment, in general after the end of the assignment.

If we use third-party providers or platforms to provide our services, the terms and conditions and privacy policies of the respective third-party providers or platforms shall apply in the relationship between the users and the providers.

**Customer Account:** Contractual partners can create a customer or user account. If the registration of a customer account is required, contractual partners will be informed of this as well as of the details required for registration. The customer accounts are not public and cannot be indexed by search engines. In the course of registration and subsequent registration and use of the customer account, we store the IP addresses of the contractual partners along with the access times, in order to be able to prove the registration and prevent any misuse of the customer account.

If customers have terminated their customer account, their data will be deleted with regard to the customer account, subject to their retention is required for legal reasons. It is the responsibility of the customer to secure their data upon termination of the customer account.

**Economic Analyses and Market Research:** For economic reasons and in order to be able to recognise market trends, wishes of contractual partners and users, we analyse the data available to us on business transactions, contracts, enquiries, etc., whereby the persons concerned may include contractual partners, interested parties, customers, visitors and users of our online service.

The analyses are carried out for the purpose of business evaluations, marketing and market research (for example, to determine customer groups with different characteristics). If available, we can take into account the profiles of registered users with information, e.g. on the services they have used. The analyses serve us alone and are not disclosed externally unless they are anonymous analyses with summarised, i.e. anonymised values. Furthermore, we respect the privacy of the users and process the data for analysis purposes as pseudonymously as possible and if possible anonymously (e.g. as summarized data).

**Education and Training Services:** We process the data of the participants of our education and training programmes (uniformly referred to as "students") in order to provide them with our educational and training services. The data processed, the type, scope and purpose of the processing and the necessity of its processing are determined by the underlying contractual and educational relationship. The processing also includes the performance evaluation and evaluation of our services and the teachers and instructors.

As part of our activities, we may also process special categories of data, in particular information on the health of persons undergoing training or further training and data revealing ethnic origin, political opinions, religious or philosophical convictions. To this end, we obtain, if necessary, the express consent of the students to be trained and further educated and process the special categories of data otherwise only if it is necessary for the provision of training services, for purposes of health care, social protection or protection of vital interests of the students to be trained and further educated.

Insofar as it is necessary for the fulfilment of our contract, for the protection of vital interests or by law, or with the consent of the trainees, we disclose or transfer the data of the students to third parties or agents, e.g. public authorities or in the field of IT, office or comparable services, in compliance with the requirements of professional law.

- **Processed data types:** Inventory data (e.g. names, addresses), Payment Data (e.g. bank details, invoices, payment history), Contact data (e.g. e-mail, telephone numbers), Contract data (e.g. contract object, duration, customer category), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Prospective customers, Business and contractual partners, Customers.
- **Purposes of Processing:** Contractual services and support, contact requests and communication, Office and organisational procedures, Managing and responding to inquiries, Security measures, Conversion Tracking, Interest-based and behavioral marketing, Profiling (Creating user profiles).
- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Compliance with a legal obligation (Article 6 (1) (c) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

## Payment Service Provider

In addition to banks and credit institutions, we use other payment service providers on the basis of our interests in efficient and secure payment procedures, whose platforms users and we can use to perform payment transactions.

- **Processed data types:** Inventory data (e.g. names, addresses), Payment Data (e.g. bank details, invoices, payment history), Contract data (e.g. contract object, duration, customer category), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Customers, Prospective customers.
- **Purposes of Processing:** Contractual services and support.
- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

### Services and service providers being used:

- **PayPal:** Payment service provider; Service provider: PayPal (Europe) S.à r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg;

## Communication via Messenger

We use Messenger services for communication purposes and therefore ask you to observe the following information regarding the functionality of the Messenger, encryption, use of the metadata of the communication and your objection options.

You can also contact us by alternative means, e.g. telephone or e-mail. Please use the contact options provided to you or use the contact options provided within our online services.

In the case of encryption of content (i.e. the content of your message and attachments), we point out that the communication content (i.e. the content of the message and attachments) is encrypted end-to-end. This means that the content of the messages is not visible, not even by the messenger providers themselves. You should always use a current version of the messenger with activated encryption, so that the encryption of the message contents is guaranteed.

However, we would like to point out to our communication partners that although messenger service providers do not see the content, they can find out that and when communication partners communicate with us and process technical information on the communication partner's device used and, depending on the settings of their device, also location information (so-called metadata).

**Information on Legal basis:** If we ask communication partners for permission before communicating with them via Messenger, the legal basis of our processing of their data is their consent. Otherwise, if we do not request consent and you contact us, for example, voluntarily, we use Messenger in our dealings with our contractual partners and as part of the contract initiation process as a contractual measure and in the case of other interested parties and communication partners on the basis of our legitimate interests in fast and efficient communication and meeting the needs of our communication partners for communication via messengers. We would also like to point out that we do not transmit the contact data provided to us to the messenger service providers for the first time without your consent.

**Withdrawal, objection and deletion:** You can withdraw your consent or object to communication with us via Messenger at any time. In the case of communication via messenger, we delete the messages in accordance with our general data retention policy (i.e. as described above after the end of contractual relationships, archiving requirements, etc.) and otherwise as soon as we can assume that we have answered any information provided by the communication partners, if no reference to a previous conversation is to be expected and there are no legal obligations to store the messages to prevent their deletion.

**Reservation of reference to other means of communication:** Finally, we would like to point out that we reserve the right, for reasons of your safety, not to answer inquiries about Messenger. This is the case if, for example, internal contractual matters require special secrecy or if an answer via the messenger does not meet the formal requirements. In such cases we refer you to more appropriate communication channels.

**Skype:** The end-to-end encryption of Skype requires its activation (unless it is enabled by default).

- **Processed data types:** Contact data (e.g. e-mail, telephone numbers), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses), Content data (e.g. text input, photographs, videos).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of Processing:** contact requests and communication, Direct marketing (e.g. by e-mail or postal).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

#### **Services and service providers being used:**

- **Facebook-Messenger:** Facebook-Messenger with end-to-end encryption (the end-to-end Facebook Messenger encryption requires activation, unless enabled by default); Service provider: <https://www.facebook.com>, Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Irland, Mutterunternehmen: Facebook, 1 Hacker Way, Menlo Park, CA 94025, USA; Website: <https://www.facebook.com>; Privacy Policy: <https://www.facebook.com/about/privacy>; Privacy Shield (Safeguarding the level of data protection when processing data in the USA): <https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active>; Opt-Out: <https://www.facebook.com/settings?tab=ads>.
- **Skype:** Skype Messenger with end-to-end encryption; Service provider: Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399 USA; Website: <https://www.skype.com>; Privacy Policy: <https://privacy.microsoft.com/de-de/privacystatement>, Security information: <https://www.microsoft.com/de-de/trustcenter>; Privacy Shield (Safeguarding the level of data protection when processing data in the USA): <https://www.privacyshield.gov/participant?id=a2zt0000000KzNaAAK&status=Active>.
- **Telegram Broadcasts:** Telegram Broadcasts - Messenger with end-to-end encryption; Service provider: Telegram, Dubai; Website: <https://telegram.org/>; Privacy Policy: <https://telegram.org/privacy>.

- **Threema:** Threema Messenger with end-to-end encryption; Service provider: Threema GmbH, Churerstrasse 82, 8808 Pfäffikon SZ, Switzerland; Website: <https://threema.ch/de>; Privacy Policy: <https://threema.ch/en/privacy>.
- **WhatsApp:** WhatsApp Messenger with end-to-end encryption; Service provider: WhatsApp Inc. WhatsApp Legal 1601 Willow Road Menlo Park, California 94025, USA; Website: <https://www.whatsapp.com/>; Privacy Policy: <https://www.whatsapp.com/legal>; Privacy Shield (Safeguarding the level of data protection when processing data in the USA): <https://www.privacyshield.gov/participant?id=a2zt0000000TSnwAAG&status=Active>.

## Online Conferences, Meetings and Webinars

We use third-party platforms and applications (hereinafter referred to as "third party providers") for the purposes of conducting video and audio conferences, webinars and other types of video and audio meetings. When selecting third-party providers and their services, we observe the legal requirements.

In this context, data of the communication participants will be processed and stored on the servers of third parties, as far as these are part of communication processes with us. This data may include, but is not limited to, registration and contact details, visual and voice contributions, chat entries and shared screen content.

If users are referred to the third-party providers or their software or platforms in the context of communication, business or other relationships with us, the third-party provider processing may process usage data and metadata that can be processed by them for security purposes, service optimisation or marketing purposes. We therefore ask you to observe the data protection information of the respective third party providers.

**Information on legal basis:** If we ask the users for their consent to the use of third party providers, the legal basis of the processing is consent. Furthermore, the processing can be a component of our (pre)contractual services, provided that the use of the third party was agreed within this context. Otherwise, user data will be processed on the basis of our legitimate interests (i.e. interest in efficient, economic and recipient friendly services). In this context, we would also like to refer you to the information on the use of cookies in this privacy policy.

- **Processed data types:** Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Content data (e.g. text input, photographs, videos), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.), Users (e.g. website visitors, users of online services).

- **Purposes of Processing:** Contractual services and support, contact requests and communication, Office and organisational procedures.
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

#### Services and service providers being used:

- **Skype:** Messenger and conference software; Service provider: Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399 USA; Website: <https://www.skype.com>; Privacy Policy: <https://privacy.microsoft.com/de-de/privacystatement>, Security information: <https://www.microsoft.com/de-de/trustcenter>; Privacy Shield (Safeguarding the level of data protection when processing data in the USA): <https://www.privacyshield.gov/participant?id=a2zt0000000KzNaAAK&status=Active>.

## Provision of online services and web hosting

In order to provide our online services securely and efficiently, we use the services of one or more web hosting providers from whose servers (or servers they manage) the online services can be accessed. For these purposes, we may use infrastructure and platform services, computing capacity, storage space and database services, as well as security and technical maintenance services.

The data processed within the framework of the provision of the hosting services may include all information relating to the users of our online services that is collected in the course of use and communication. This regularly includes the IP address, which is necessary to be able to deliver the contents of online services to browsers, and all entries made within our online services or from websites.

**E-mail Sending and Hosting:** The web hosting services we use also include sending, receiving and storing e-mails. For these purposes, the addresses of the recipients and senders, as well as other information relating to the sending of e-mails (e.g. the providers involved) and the contents of the respective e-mails are processed. The above data may also be processed for SPAM detection purposes. Please note that e-mails on the Internet are generally not sent in encrypted form. As a rule, e-mails are encrypted during transport, but not on the servers from which they are sent and received (unless a so-called end-to-end encryption method is used). We can therefore accept no responsibility for the transmission path of e-mails between the sender and reception on our server.

**Collection of Access Data and Log Files:** We, ourselves or our web hosting provider, collect data on the basis of each access to the server (so-called server log files). Server log files may include the address and name of the web pages and files accessed, the date and time of access, data volumes transferred, notification of successful access,

browser type and version, the user's operating system, referrer URL (the previously visited page) and, as a general rule, IP addresses and the requesting provider.

The server log files can be used for security purposes, e.g. to avoid overloading the servers (especially in the case of abusive attacks, so-called DDoS attacks) and to ensure the stability and optimal load balancing of the servers .

- **Processed data types:** Content data (e.g. text input, photographs, videos), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

## Profiles in Social Networks

We maintain online presences within social networks in order to communicate with the users active there or to offer information about us there.

We would like to point out that user data may be processed outside the European Union. This may entail risks for users, e.g. by making it more difficult to enforce users' rights. With regard to US providers certified under the Privacy Shield or offering comparable guarantees of a secure level of data protection, we would like to point out that they thereby commit themselves to comply with EU data protection standards.

In addition, user data is usually processed within social networks for market research and advertising purposes. For example, user profiles can be created on the basis of user behaviour and the associated interests of users. The user profiles can then be used, for example, to place advertisements within and outside the networks which are presumed to correspond to the interests of the users. For these purposes, cookies are usually stored on the user's computer, in which the user's usage behaviour and interests are stored. Furthermore, data can be stored in the user profiles independently of the devices used by the users (especially if the users are members of the respective networks or will become members later on).

For a detailed description of the respective processing operations and the opt-out options, please refer to the respective data protection declarations and information provided by the providers of the respective networks.

Also in the case of requests for information and the exercise of rights of data subjects, we point out that these can be most effectively pursued with the providers. Only the providers have access to the data of the users and can directly take appropriate measures and provide information. If you still need help, please do not hesitate to contact us.

- **Processed data types:** Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Content data (e.g. text input, photographs, videos), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** contact requests and communication, Targeting (e.g. profiling based on interests and behaviour, use of cookies), Remarketing, Web Analytics (e.g. access statistics, recognition of returning visitors).
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

#### Services and service providers being used:

- **Instagram :** Social network; Service provider: Instagram Inc., 1601 Willow Road, Menlo Park, CA, 94025, USA; Website: <https://www.instagram.com>; Privacy Policy: <http://instagram.com/about/legal/privacy>.
- **Facebook:** Social network; Service provider: Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, parent company: Facebook, 1 Hacker Way, Menlo Park, CA 94025, USA; Website: <https://www.facebook.com>; Privacy Policy: <https://www.facebook.com/about/privacy>; Privacy Shield (Safeguarding the level of data protection when processing data in the USA): <https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active>; Opt-Out: Settings for advertisements: <https://www.facebook.com/settings?tab=ads>; Additional information on data protection: Agreement on the joint controll of processing of personal data on Facebook pages: [https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum), privacy policy for Facebook pages: [https://www.facebook.com/legal/terms/information\\_about\\_page\\_insights\\_data](https://www.facebook.com/legal/terms/information_about_page_insights_data).
- **LinkedIn:** Social network; Service provider: LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland; Website: <https://www.linkedin.com>; Privacy Policy: <https://www.linkedin.com/legal/privacy-policy>; Privacy Shield (Safeguarding the level of data protection when processing data in the USA): <https://www.privacyshield.gov/participant?id=a2zt0000000L0UZAA0&status=Active>; Opt-Out: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.
- **Pinterest:** Social network; Service provider: Pinterest Inc., 635 High Street, Palo Alto, CA, 94301, USA,; Website: <https://www.pinterest.com>; Privacy Policy: <https://about.pinterest.com/de/privacy-policy>; Opt-Out: <https://about.pinterest.com/de/privacy-policy>.
- **Twitter:** Social network; Service provider: Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA; Privacy Policy: <https://twitter.com/de/privacy>,

(Settings) <https://twitter.com/personalization>; Privacy Shield (Safeguarding the level of data protection when processing data in the USA): <https://www.privacyshield.gov/participant?id=a2zt0000000TORzAAO&status=Active>.

- **YouTube:** Social network; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Privacy Policy: <https://policies.google.com/privacy>; Privacy Shield (Safeguarding the level of data protection when processing data in the USA): <https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>; Opt-Out: <https://adssettings.google.com/authenticated>.
- **Xing:** Social network; Service provider: XING AG, Dammtorstraße 29-32, 20354 Hamburg, Germany; Website: <https://www.xing.com>; Privacy Policy: <https://privacy.xing.com/en>.

## Planning, Organization and Utilities

We use services, platforms and software from other providers (hereinafter referred to as "third-party providers") for the purposes of organizing, administering, planning and providing our services. When selecting third-party providers and their services, we comply with the legal requirements.

Within this context, personal data may be processed and stored on the servers of third-party providers. This may include various data that we process in accordance with this privacy policy. This data may include in particular master data and contact data of users, data on processes, contracts, other processes and their contents.

If users are referred to the third-party providers or their software or platforms in the context of communication, business or other relationships with us, the third-party provider processing may process usage data and metadata that can be processed by them for security purposes, service optimisation or marketing purposes. We therefore ask you to read the data protection notices of the respective third party providers.

**Information on legal basis:** If we ask the users for their consent to the use of third party providers, the legal basis of the processing is consent. Furthermore, the processing can be a component of our (pre)contractual services, provided that the use of the third party was agreed within this context. Otherwise, user data will be processed on the basis of our legitimate interests (i.e. interest in efficient, economic and recipient friendly services). In this context, we would also like to refer you to the information on the use of cookies in this privacy policy.

- **Processed data types:** Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Content data (e.g. text input, photographs, videos),

Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).

- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.), Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Office and organisational procedures, contact requests and communication.
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

#### **Services and service providers being used:**

- **Doodle:** Online scheduling; Service provider: Doodle AG, Werdstrasse 21, Postfach, 8021 Zürich, Switzerland; Website: <https://doodle.com>; Privacy Policy: <https://doodle.com/privacy-policy>.
- **WeTransfer:** Transferring files over the Internet; Service provider: WeTransfer BV, Oostelijke Handelskade 751, Amsterdam, 1019 BW, Netherlands; Website: <https://wetransfer.com>; Privacy Policy: <https://wetransfer.com/legal/privacy>.

## **Erasure of data**

The data processed by us will be erased in accordance with the statutory provisions as soon as their processing is revoked or other permissions no longer apply (e.g. if the purpose of processing this data no longer applies or they are not required for the purpose).

If the data are not deleted because they are required for other and legally permissible purposes, their processing is limited to these purposes. This means that the data will be restricted and not processed for other purposes. This applies, for example, to data that must be stored for commercial or tax reasons or for which storage is necessary to assert, exercise or defend legal claims or to protect the rights of another natural or legal person.

Further information on the erasure of personal data can also be found in the individual data protection notices of this privacy policy.

## **Changes and Updates to the Privacy Policy**

We kindly ask you to inform yourself regularly about the contents of our data protection declaration. We will adjust the privacy policy as changes in our data processing practices make this necessary. We will inform you as soon as the changes require your cooperation (e.g. consent) or other individual notification.

