

# Privacy Policy

## Legal Notice

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This document is the property of, and contains confidential information of Workrate and/or its affiliates. Possession and use of this documentation is authorized only as specified in NDA, client- contract or pursuant to the license accompanying this document.

The information contained herein is subject to change without notice. The only warranties for Workrate products and services are set forth in the express warranty statements accompanying such products and services.

Nothing herein should be construed as constituting an additional warranty. Workrate shall not be liable for technical or editorial errors or omissions contained herein.

As the operator of these pages, we take the protection of your personal data very seriously. We treat your personal data confidentially and in accordance with the statutory data protection regulations and in accordance with this data protection notice.

When you use this website, various personal data is collected. Personal data is data that can be used to identify you personally. This Privacy Notice explains what data we collect and what we use it for. It also explains how and for what purpose this is done.

We would like to point out that data transmission on the Internet (e.g. when communicating by e-mail) may have security gaps. It is not possible to completely protect the data from access by third parties.

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## 1. General information

### 1.1 Provider and responsible body within the meaning of the Data Protection Act.

Responsible according to Art. 4 No. 7 EU Data Protection Basic Regulation (GDPR) is:

*Workrate Holding B.V.*  
*Tupolevlaan 103, 1119PA*  
*Schiphol-Rijk (Netherlands)*  
*E-mail: [compliance@workrate.eu](mailto:compliance@workrate.eu)*

General enquiries regarding data protection, such as the enforcement of data subject rights, should be directed to:

*[compliance@workrate.eu](mailto:compliance@workrate.eu)*

In Germany, you can also contact:

*Workrate GmbH*  
*Rathausplatz 3-7*  
*61348 Bad Homburg*  
*[compliance@workrate.eu](mailto:compliance@workrate.eu)*

General enquiries regarding data protection, such as the enforcement of data subject rights, should be directed to:

*[datenschutz@workrate.eu](mailto:datenschutz@workrate.eu)*

Confidential data protection enquiries can be addressed to our data protection officer by telephone, post or e-mail:

*Ronald Baranowski*  
*SIX DATENSCHUTZ GmbH*  
*Marktplatz 6D - 61118 Bad Vilbel/Tel: +49 6101 982 9422*  
*[rb\(at\)six-datenschutz.de](mailto:rb(at)six-datenschutz.de)*

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## 1.2 Scope

This data protection information applies to our online offer, which can be accessed in particular under [workrate.eu/de](https://workrate.eu/de), as well as whenever reference is otherwise made to this data protection information from one of our offers (e.g. websites, subdomains, mobile applications, web services or integrations into third-party sites), regardless of how you access or use it. All of these offerings are collectively referred to as the "Services".

## 1.3 Integration of third-party services and content

Our offer may include content, services and services from other providers. In order for this data to be called up and displayed in the user's browser, the transmission of the IP address is mandatory. The providers (hereinafter referred to as "third-party providers") therefore perceive the IP address of the respective user.

Even though we try to use only third-party providers who only need the IP address to be able to deliver content, we have no influence on whether the IP address may be stored. In this case, this process serves, among other things, statistical purposes. If we are aware that the IP address is being stored, we will inform our users of this.

## 1.4 Transfer of personal data to third countries

If we transfer data to third countries, i.e. countries outside the European Union, then the transfer will only take place in compliance with the legally regulated admissibility requirements. If the transfer of the data to a third country does not serve the performance of our contract with you, we do not have your consent, the transfer is not necessary for the assertion, exercise or defense of legal claims and no other exception under Art. 49 GDPR applies, we will only transfer your data to a third country if an adequacy decision pursuant to Art. 45 GDPR or suitable safeguards pursuant to Art. 46 GDPR are in place.

An adequate level of data protection in the USA was most recently declared by the "Data Privacy Framework (DPF)" adequacy decision adopted in July 2023. US companies must be certified in order to be listed in it. The adequacy decision can be found here:

[https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\\_en](https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en).

We have agreed so-called EU standard data protection clauses with providers in third countries as well as partial data processing on servers in Germany and the EU. Timely data deletion reduces the risk of unauthorized access.

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Alternatively or in addition, the EU standard data protection clauses issued by the European Commission with the receiving entity create appropriate safeguards pursuant to Art. 46 para. 2 c) GDPR as well as an adequate level of data protection. Copies of the EU Standard Data Protection Clauses are available on the European Commission's website, available [here](#).

## 1.5 Disclosure of data to third parties

Your data will not be transmitted to unauthorized third parties. To the extent that external service providers receive your personal data, we have ensured that they implement appropriate technical and organizational measures and that they comply with the applicable data protection regulations and laws.

## 1.6 Data minimization

In accordance with the principles of data avoidance and data economy, we only store personal data for as long as is necessary or prescribed by law (statutory storage period). If the purpose of the collected data no longer applies or the storage period ends, we block or delete the data.

# 2 Processing in detail

In the following, we inform you about the purpose, in what way and to what extent your personal data may be processed when you visit our website.

## 2.1 Collection of personal data when you visit our website

When using the website for informational purposes only, i.e. if you do not register or otherwise transmit information to us, we only collect the personal data that your browser transmits to our server. If you want to view our website, we collect the following data, which is technically necessary for us to display our website to you and to ensure stability and security (the legal basis for this is Art. 6 para. 1 sentence 1 lit. f) GDPR, legitimate interest):

- IP address
- Hostname
- Date and time of the request
- Time zone difference to Greenwich Mean Time (GMT)
- Content of the request (specific page)
- Access status / HTTP status code
- Amount of data transferred in each case
- Website from which the request comes (referrer)
- The specific pages of our website you accessed

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- Browser: type, version, and language set
- Operating system: type and version

If JavaScript is enabled, also:

- Screen resolution
- Color depth
- Browser window size
- Installed browser plugins

## 2.2 Cookies

This website uses so-called cookies. These are text files that are stored on your computer from the server. They may include information about the browser, IP address, operating system, and internet connection. We will not pass on this data to third parties or link it to personal data without their consent.

Cookies serve two main tasks. They help us to make it easier for you to navigate through our offer and enable the correct display of the website. They are not used to inject viruses or launch programs.

Users have the option of accessing our website without cookies. To do this, the corresponding settings must be changed in the browser. Please refer to the help function of your browser for information on how to disable cookies. However, we would like to point out that this may impair some functions of this website and may limit the user's comfort.

The [www.aboutads.info/choices/](http://www.aboutads.info/choices/) (US) and [www.youronlinechoices.com/uk/your-ad-choices/](http://www.youronlinechoices.com/uk/your-ad-choices/) (Europe) pages allow you to manage the ads of interest-based advertising.

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### 2.3 Use of essential cookies

Essential cookies do not require your consent and are processed by us in accordance with Art. 6 (1) (f) GDPR. Our legitimate interest in this is the smooth and optimal use and presentation of our website.

### 2.4 Cookie Consent / Required Consent to Use of Services by Third-Party Providers

On our website, we use HubSpot's cookie consent tool. HubSpot is a software company based in the United States with an office in Ireland: HubSpot, Ground Floor, Two Dockland Central, Guild Street, Dublin 1, Ireland (hereinafter: "HubSpot").

The purpose of this processing is to obtain your consent for the cookies used on our website that are not technically necessary and to document them in accordance with applicable data protection regulations and laws.

When you visit our website, a cookie is stored in your browser in which the consents you have given or the withdrawal of these consents are documented.

Hubspot processes this data as our processor. Details can be found here:  
<https://legal.hubspot.com/de/dpa>

The legal basis for this data processing is Art. 6 para. 1 lit. c) GDPR – legal obligation that consent must be obtained for cookies that are not technically necessary before they are used in accordance with the ECJ ruling of 1 October 2019, [docket no. C-673/17](#).

The collected data will be stored until you ask us to delete it or delete the cookie yourself or the purpose for which the data is stored no longer applies. Mandatory statutory retention periods remain unaffected.

You can find more information about [HubSpot's privacy policy](#) here; more information about the cookies used by HubSpot can be found [here](#) and [here](#).

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## 2.5 HubSpot

We use HubSpot for our online marketing activities and customer relationship management (CRM). HubSpot is a software company based in the United States with an office in Ireland: HubSpot, Ground Floor, Two Dockland Central, Guild Street, Dublin 1, Ireland (hereinafter: "HubSpot"). This is an integrated software-as-a-service ("SaaS") solution that we use to cover various aspects of our online marketing.

These include, among others:

- Email marketing (newsletters, personal emails, and automated emails)
- Social Media Publishing & Reporting
- Reporting (e.g. traffic sources, accesses, etc.)
- Contact
- Landing pages and contact forms

This information is stored on HubSpot's servers. We collect, process and use personal data only insofar as they are necessary for the establishment, content design or change of the legal relationship (inventory data). This is done on the basis of Art. 6 (1) (b) GDPR, which permits the processing of data for the performance of a contract or pre-contractual measures. We collect, process and use personal data about the use of our website (usage data) only to the extent necessary to enable the user to use the service or to bill for it.

The customer data collected will be deleted after completion of the order or termination of the business relationship. Statutory retention periods remain unaffected.

All information we collect is subject to this Privacy Notice. We use all information collected solely to optimize our marketing, sales, and customer relationship management.

For the sending of newsletters and the analysis of your user behavior (tracking, analyses), the legal basis is your consent in accordance with Art. 6 (1) (a) GDPR. You can revoke your consent at any time with effect for the future. The lawfulness of the data processing operations that have already taken place remains unaffected by the revocation.

Hubspot processes this data as our processor. Details can be found here:

<https://legal.hubspot.com/de/dpa>

You can find more information about [HubSpot's privacy policy](#) here; more information about the cookies used by HubSpot can be found [here](#) and [here](#).

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We have a Data Processing Agreement with HubSpot that governs the following operations. The agreement is available at: <https://legal.hubspot.com/de/dpa>. HubSpot's processing of data is additionally governed by the Standard Contractual Clauses to comply with applicable data protection regulations.

Please note that personal data is also processed by HubSpot in the United States or other third countries. HubSpot says it only transfers personal data to countries for which an adequacy decision has been issued by the European Commission in accordance with Art. 45 GDPR or on the basis of suitable safeguards in accordance with Art. 46 GDPR.

## 2.6 Processing customer and contract data

We collect, process and use personal data only insofar as they are necessary for the establishment, content design or change of the legal relationship (inventory data). This is done on the basis of Art. 6 (1) (b) GDPR, which permits the processing of data for the performance of a contract or pre-contractual measures. We collect, process and use personal data about the use of our website (usage data) only to the extent necessary to enable the user to use the service or to bill for it.

The customer data collected will be deleted after completion of the order or termination of the business relationship. Statutory retention periods remain unaffected.

## 2.7 Contact

If you send us enquiries via the contact form, your details from the enquiry form, including the contact details you provide there, will be stored by us for the purpose of processing the enquiry and in the event of follow-up questions.

The disclosure of your data is completely voluntary.

The processing of this data is carried out on the basis of Art. 6 para. 1 lit. b) GDPR, if your request is related to the performance of a contract or 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 request addressed to us (Art. 6 para. 1 lit. f) GDPR).

You can object to the processing of your data at any time. The lawfulness of the data processing operations carried out up to the objection remains unaffected by the revocation.

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Your data will remain with us until you ask us to delete it, object to the processing or the purpose for which the data is stored no longer applies (e.g. after your request has been processed). Mandatory statutory provisions – in particular retention periods – remain unaffected. It will not be passed on to unauthorized third parties. The data collected in this way is also not compared with data that may be collected by other components of our website.

## 2.8 Newsletter

If you sign up for our newsletter, we will use the data you enter exclusively for this purpose or to inform you about the circumstances relevant to this service or registration. We do not pass on this data to unauthorized third parties. As a newsletter service provider, we use HubSpot. HubSpot is a software company based in the United States with an office in Ireland: HubSpot, Ground Floor, Two Dockland Central, Guild Street, Dublin 1, Ireland (see Section 2.5). A valid (valid) e-mail address is required to receive the newsletter. The IP address you use to register for the newsletter and the date on which you subscribe to the newsletter are also stored. This data serves us as proof of misuse if a third-party e-mail address is registered for the newsletter. In order to ensure that an e-mail address is not improperly entered into our mailing list by third parties, we work in accordance with the law with the so-called "double opt-in" procedure. As part of this process, the subscription to the newsletter, the sending of the confirmation email and the receipt of the registration confirmation are logged. The legal basis is your consent in accordance with Art. 6 (1) (a) GDPR.

You have the option of revoking your consent to the storage of data, e-mail address and its use for newsletter dispatch at any time. We provide you with a link for revocation in each newsletter and on the website. You also have the option of informing us of your wish to withdraw your consent using the contact options provided in this document.

## 2.9 Analytics services to optimize our services and their use

The analysis of user behavior by means of tracking helps us to check the effectiveness of our services, to optimize them and adapt them to the needs of the users as well as to correct errors. It also serves to statistically determine key values about the use of our services (reach, intensity of use, surfing behavior of users) – on the basis of uniform standard procedures – and thus to obtain comparable values throughout the market.

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Tracking is carried out on the basis of your prior consent in accordance with Art. 6 (1) (a) GDPR. If you have given us your consent, you can revoke it at any time in the cookie settings.

### Google Analytics

This website uses functions of the web analysis service Google Analytics. The provider is Google Ireland Ltd. (Gordon House, Barrow Street, Dublin 4, Ireland, hereinafter: Google Analytics).

Google Analytics uses so-called "cookies". These are text files that are stored on your computer and enable an analysis of your use of the website.

The information generated by the cookie about your use of the website, such as

- Browser type/version,
- operating system used,
- Referrer URL (the previously visited page),
- Host name of the accessing computer (IP address),
- Time of the server request

are usually transmitted to a Google server in the USA and stored there. The IP address transmitted by your browser as part of Google Analytics will not be merged with other data held by Google. We have also added the code "anonymizeIP" to Google Analytics on this website. This guarantees a change in your IP address, so that all data is collected anonymously. Only in exceptional cases is the full IP address transmitted to a Google server in the USA and shortened there.

On behalf of the operator of this website, Google will use this information to evaluate your use of the website, to compile reports on website activity and to provide other services related to website use and internet use to the website operator. You can prevent the storage of cookies by setting your browser software accordingly; however, we would like to point out that in this case you may not be able to use all the functions of this website to their full extent.

You can also prevent the collection of the data generated by the cookie and related to your use of the website (including your IP address) by Google and the processing of this data by Google by downloading and installing the browser plug-in available at the following link:

<http://tools.google.com/dlpage/gaoptout?hl=de>. An opt-out cookie will be set to prevent the future collection of your data when you visit this website.

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The opt-out cookie is only valid in this browser and only for our website and is placed on your device. If you delete the cookies in this browser, you will need to set the opt-out cookie again. You can find more information about data protection in connection with Google Analytics in the Google Analytics Help Center (<https://support.google.com/analytics/answer/6004245?hl=de>) The legal basis for the processing of the data is your consent in accordance with Art. 6 para. 1 sentence 1 lit. a) GDPR.

We have concluded a contract processing agreement with Google and fully implement the strict requirements of the German data protection authorities when using Google Analytics. We use the data obtained to determine how you have used our website. This helps us to optimize the website and to increase the user-friendliness more and more. These purposes also constitute our legitimate interest in processing your personal data. We delete your personal data when it is no longer necessary to achieve the purpose for which it was processed. This is the case after a maximum of 14 months. You can prevent the collection of your data by Google Analytics by clicking on the following link. An opt-out cookie will be set that prevents the collection of your data on future visits to this website: [Deactivate Google Analytics](#).

More information on the handling of user data by Google Analytics can be found in Google's privacy policy: <https://support.google.com/analytics/answer/6004245?hl=de>.

### LinkedIn Analytics

We use "LinkedIn Analytics", a service of LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland (headquartered in the USA: LinkedIn Corp., 1000 Q Maude Ave, Sunnyvale, CA 94085) for the analysis of user behavior.

For this purpose, cookies are used, among other things, which are stored locally in the cache of your web browser on your device and which enable an analysis of the use of our website by our users.

We use LinkedIn Ads for marketing and optimization purposes, in particular to analyze the use of our website and to be able to continuously improve individual functions and the user experience.

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By statistically evaluating user behavior, we can improve our offer and make it more interesting for our users. This is also our legitimate interest in the processing of the above data by the third-party provider.

The legal basis is Art. 6 para. 1 lit. a) GDPR, as the use of this service requires your consent. You can revoke your consent at any time in the cookie settings.

You can also prevent the installation of cookies by deleting existing cookies and deactivating the storage of cookies in the settings of your web browser. You can also prevent the collection of the aforementioned information, in particular by LinkedIn, by clicking on the following link and setting an opt-out cookie:

<https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>

Note that this setting will be deleted when you delete your cookies.

We have entered into a Data Processing Agreement with LinkedIn that governs the following operations: the processing of personal data that we upload or otherwise provide to LinkedIn as part of the Services, the processing of personal data by LinkedIn on our behalf in connection with the Services, and the processing of any personal data; that LinkedIn uploads or otherwise makes available to us in connection with the Services.

The agreement is available at: <https://de.linkedin.com/legal//dpa>. The transfer of data to LinkedIn is additionally governed by the Standard Contractual Clauses to comply with applicable data protection regulations.

Please note that according to the LinkedIn Privacy Policy, personal data will also be processed by LinkedIn in the USA or other third countries. LinkedIn says it only transfers personal data to countries for which an adequacy decision has been issued by the European Commission in accordance with Art. 45 GDPR or on the basis of suitable safeguards in accordance with Art. 46 GDPR.

LinkedIn is a listed company in the Data Privacy Framework (see also Section 1.4 of this Privacy Policy).

You can find more information about data protection at LinkedIn here:

<https://www.linkedin.com/legal/privacy-policy>

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## 2.10 Tracking to measure the success of advertising campaigns and optimize the display of advertisements

In the following, we describe how your personal data is processed using tracking technologies on the basis of your consent in accordance with Art. 6 (1) (a) GDPR in order to make the success of advertising campaigns measurable and to optimize the display of advertisements. Tracking to measure the success of advertising campaigns is used to optimize our ads for the future and to enable marketers and advertisers to optimize their ads accordingly. The purpose of tracking to optimize the display of advertising is to show users advertising tailored to their interests, to increase the success of the advertising and thus also to increase advertising revenues.

The legal basis for this processing of personal data is Art. 6 (1) (a) GDPR (consent). If you have given us your consent, you can revoke it at any time in the cookie settings.

### Meta Pixel

Our website uses the visitor action pixel of Meta Platforms Ireland Limited (4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland), hereinafter referred to as Meta), formerly the Facebook pixel, for conversion measurement.

In this way, the behavior of site visitors can be tracked after they have been redirected to the provider's website by clicking on a meta advertisement. This allows the effectiveness of Meta ads to be evaluated for statistical and market research purposes and to optimize future advertising efforts.

The data collected is anonymous for us as the operator of this website, we cannot draw any conclusions about the identity of the users. However, the data is stored and processed by Meta so that a connection to the respective user profile is possible and Meta can use the data for its own advertising purposes, in accordance with the [Meta Privacy Policy](#) . This allows Meta to enable the placement of advertisements on and off Meta pages. This use of the data cannot be influenced by.

The use of Meta-Pixel is based on Art. 6 para. 1 lit. a) GDPR, with your consent.

You can find more information about protecting your privacy in Meta's privacy policy: <https://de-de.facebook.com/about/privacy/>.

You can also turn off the Custom Audiences remarketing feature in the Ads Settings section of [https://www.facebook.com/ads/preferences/?entry\\_product=ad\\_settings\\_screen](https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen).

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To do this, you must be logged in to Meta/Facebook.

Meta's supplementary agreement on the processing of the data can be found here:

[https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum)

If you do not have a Meta/Facebook account, you can opt out of Meta/Facebook usage-based advertising on the European Interactive Digital Advertising Alliance website:

<http://www.youronlinechoices.com/de/praferenzmanagement/>.

### Google Ads

Google AdWords is an Internet advertising service provided by Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland (belonging to Google Inc., with headquarters at 1600 Amphitheatre Parkway in Mountain View, CA 94043, USA).

This service allows advertisers to place ads in Google's search engine results as well as in the Google advertising network. Google AdWords allows an advertiser to pre-define certain keywords that will only be used to display an ad in Google's search engine results when the user uses the search engine to retrieve a keyword-relevant search result.

In the Google advertising network, the ads are distributed by means of an automatic algorithm and in compliance with the previously defined keywords on topic-relevant websites.

The purpose of Google AdWords is to advertise our website by displaying interest-relevant advertising on the websites of third-party companies and in the search engine results of the Google search engine and by displaying third-party advertising on our website.

If a data subject reaches our website via a Google ad, a so-called conversion cookie is stored on the data subject's information technology system by Google. A conversion cookie loses its validity after thirty days and is not used to identify the data subject. If the cookie has not yet expired, the conversion cookie is used to track whether certain subpages, such as the shopping cart from an online shop system, have been accessed on our website.

The data and information collected through the use of the conversion cookie are used by Google to compile visit statistics for our website. These visit statistics are used by us to determine the total number of users who have been referred to us via AdWords ads and to optimize our AdWords ads for the future. Neither our company nor other Google AdWords advertisers receive information from Google that could be used to identify the data subject.

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The conversion cookie is used to store personal information, such as the websites visited by the data subject. Every time you visit our website, personal data, including the IP address of the Internet connection used by the data subject, is transmitted to Google in the United States of America and may be stored by Google in the United States of America.

Google may pass on this personal data collected via the technical process to third parties. The data subject can prevent the setting of cookies by our website at any time by means of an appropriate setting of the Internet browser used and thus permanently object to the setting of cookies.

The legal basis for this type of processing is your consent in accordance with Art. 6 (1) (a) GDPR.

Furthermore, the data subject has the option of objecting to interest-based advertising by Google. To do this, the data subject must access the link [www.google.de/settings/ads](http://www.google.de/settings/ads) from each of the Internet browsers used by him or her and make the desired settings there. Further information and Google's applicable privacy policy can be found at [www.google.de/intl/de/policies/privacy/](http://www.google.de/intl/de/policies/privacy/).

### **Google Marketing Platform (formerly DoubleClick by Google)/Campaign Manager**

This website uses the Online Marketing Tool Campaign Manager of Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland (belonging to Google Inc., with headquarters at 1600 Amphitheatre Parkway in Mountain View, CA 94043, USA).

Campaign Manager uses cookies to show ads that are relevant to users, to improve campaign performance reports, or to prevent a user from seeing the same ads more than once. Google uses a cookie ID to record which ads are displayed in which browser and can thus prevent them from being displayed multiple times. In addition, Campaign Manager can use cookie IDs to track conversions related to ad requests. This is the case, for example, if a user sees a Campaign Manager ad and later uses the same browser to visit the advertiser's website and make a purchase there.

According to Google, Campaign Manager cookies do not contain any personal information. Due to the marketing tools used, your browser automatically establishes a direct connection with Google's server. We have no influence on the scope and further use of the data collected by Google through the use of this tool and therefore inform you according to our state of knowledge: Through the integration of Campaign Manager, Google receives the information

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that you have accessed the relevant part of our website or clicked on an ad from us. If you are registered with a Google service, Google can assign the visit to your account. Even if you are not registered with Google or have not logged in, there is a possibility that the provider will learn and store your IP address.

The processing is carried out with your consent in accordance with Art. 6 (1) (a) GDPR. You can revoke your consent at any time in the cookie settings.

In addition, you can prevent participation in this tracking procedure in several ways:

- by setting your browser software accordingly, in particular the suppression of third-party cookies will result in you not receiving third-party ads;
- by disabling cookies for conversion tracking, by setting your browser to block cookies from the domain [googleadservices.com](https://www.google.de/settings/ads), <https://www.google.de/settings/ads>, which setting will be deleted when you delete your cookies;
- by disabling the interest-based ads of the providers that are part of the "About Ads" self-regulatory campaign via the <http://www.aboutads.info/choices> link, which setting will be deleted when you delete your cookies;
- by permanently deactivating it in your Firefox, Internet Explorer or Google Chrome browsers under the link <http://www.google.com/settings/ads/plugin>,
- by means of the appropriate cookie setting. We would like to point out that in this case you may not be able to use all the functions of this offer to their full extent. In addition, you can prevent Google from collecting the data generated by the cookies about your use of the websites and the processing of this data by Google by downloading and installing the browser plugin available under <https://support.google.com/adsense/answer/142293?hl=de> under "Display settings", "Extension for Campaign Manager deactivation".

The data we send and link to cookies is automatically deleted after 14 months. The deletion of data whose retention period has been reached takes place automatically once a month.

Further information on the Google Marketing Platform can be found at <https://marketingplatform.google.com/about> and on data protection at Google in general: <https://www.google.de/intl/de/policies/privacy>. Alternatively, you can visit the Network Advertising Initiative (NAI) website at <http://www.networkadvertising.org>.

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### LinkedIn Ads

On our website, we use the conversion tracking technology as well as the retargeting function of LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland, with headquarters in the USA: LinkedIn Corp., 1000 Q Maude Ave, Sunnyvale, CA 94085.

With the help of this technology, visitors to this website can be shown personalized advertisements on LinkedIn. There is also the possibility to create anonymous reports on the performance of the ads as well as information on website interaction.

For this purpose, the LinkedIn Insight tag is integrated into this website, which establishes a connection to the LinkedIn server if you visit this website and are logged in to your LinkedIn account at the same time.

The legal basis for the use of this service is Art. 6 (1) (a) GDPR (consent).

We have entered into a Data Processing Agreement with LinkedIn that governs the following operations: the processing of personal data that we upload or otherwise provide to LinkedIn as part of the Services, the processing of personal data by LinkedIn on our behalf in connection with the Services, and the processing of any personal data; that LinkedIn uploads or otherwise makes available to us in connection with the Services. The agreement is available at:

<https://de.linkedin.com/legal//dpa>. The transfer of data to LinkedIn is additionally governed by the Standard Contractual Clauses to comply with applicable data protection regulations.

Please note that according to the LinkedIn Privacy Policy, personal data will also be processed by LinkedIn in the USA or other third countries. LinkedIn says it only transfers personal data to countries for which an adequacy decision has been issued by the European Commission in accordance with Art. 45 GDPR or on the basis of suitable safeguards in accordance with Art. 46 GDPR.

Further information on data collection and data use, as well as the possibilities and rights to protect your privacy, can be found in LinkedIn's privacy policy under

<https://www.linkedin.com/legal/privacy-policy>. If you are logged in to LinkedIn, you can deactivate data collection at any time under the following link:

<https://www.linkedin.com/psettings/enhanced-advertising>.

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## 2.11 Other services

### Google Tag Manager

This website uses the Google Tag Manager of Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland (belonging to Google Inc., with headquarters at 1600 Amphitheatre Parkway in Mountain View, CA 94043, USA).

Google Tag Manager offers a technical platform to execute other web services and web tracking programs by means of so-called "tags" and to be able to control them in a bundled manner. In this context, Google Tag Manager stores cookies on your computer and, if web tracking tools are executed using Google Tag Manager, analyzes your surfing behavior (so-called "tracking").

This data, sent by individual tags integrated into Google Tag Manager, is merged, stored, and processed by Google Tag Manager under a unified user interface. All integrated "tags" are listed separately in this data protection notice.

As part of the use of our website when Google Tag Manager tags are activated, data, such as your IP address and your user activities, are transmitted to servers of the company Google Ireland Ltd. and processed and stored outside the European Union, e.g. in the USA.

On our behalf, Google will use this information to evaluate your visit to this website, to compile reports on website activity and to provide us with other services related to website and internet usage.

The IP address transmitted by your browser as part of Google Tag Manager will not be merged with other data of Google Ireland Ltd.

The storage and analysis of the data is carried out on the basis of Art. 6 para. 1 lit. a) GDPR (consent), either as part of the registration with Google (opening a Google account and accepting the data protection information implemented there) or, if you have not registered with Google, by explicit consent when opening our site. Your consent can be revoked at any time in the cookie settings.

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### Google Fonts

For the graphically uniform display of fonts, we use the fonts of the provider Google (Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, belonging to Google Inc., with headquarters in 1600 Amphitheatre Parkway in Mountain View, CA 94043, USA).

These are dynamically loaded fonts. Technical data (e.g. IP address, browser type, etc.) may be processed by the service provider. The use of the above-mentioned service is in the interest of a uniform and appealing presentation of our online offers. The processing is carried out in accordance with Art. 6 para. 1 lit. a) GDPR, with your consent.

## 2.12 Social Media

We maintain publicly accessible profiles on social networks, to which we provide links (text links or graphics) on our website. The responsible body is therefore responsible for the respective presence in the respective social network.

As a rule, social networks analyze your user behavior comprehensively when you visit their websites. Visiting the social media presences therefore triggers numerous data protection-relevant processing operations over which we have no influence.

If you are logged in to your social media account and visit a social media presence, the operator of the social network can assign this visit to your user account. However, your personal data may also be collected if you are not logged in or do not have an account with the respective social network. In this case, this data collection is carried out, for example, via cookies that are stored on your device or by recording your IP address.

With the help of the data collected in this way, the operators of the social networks can create user profiles in which your preferences and interests are stored. In this way, interest-based advertising can be shown to you on and off the respective social networks. If you have an account with the relevant social network, the interest-based advertising can be displayed on all devices on which you are logged in or were logged in.

Please also note that we cannot track all the processing processes of the social networks. Depending on the provider, further processing operations may therefore be carried out. For details, please refer to the terms of use and privacy policy of the respective social network (see below).

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Our social media presences are intended to ensure the widest possible presence of our company, our goods and services on the Internet. This is a legitimate interest within the meaning of Art. 6 (1) (f) GDPR. The analysis processes initiated by the social networks may be based on different legal bases, which must be indicated by the operators of the social networks (e.g. on your consent within the meaning of Art. 6 para. 1 lit. a) GDPR).

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

We have no influence on the duration of the storage of your personal data by the operators of the social networks for their own purposes. Please contact the operators of the social networks directly (e.g. in their privacy policy, see below).

### **Social networks in detail:**

#### **Instagram**

The operating company of Instagram's services is Meta Platforms Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland.

The data collected is also transferred to the USA and other third countries and stored on servers in the USA or in other third countries. We have concluded a Controller Addendum with Meta. This Agreement sets out which data processing operations we or Meta are responsible for when you visit the Instagram page. You can view this agreement at the following link:

[www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum)

You can adjust your advertising settings independently in your user account. To do this, click on the following link and log in:

<https://help.instagram.com/131112217071354>

Details can be found in Instagram's privacy policy:

<https://about.instagram.com/de-de/safety>

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Further information and Instagram's applicable data protection regulations can be found at [help.instagram.com/155833707900388](https://help.instagram.com/155833707900388) and [www.instagram.com/about/legal/privacy/](https://www.instagram.com/about/legal/privacy/).

### Facebook

We have a profile on Facebook. The provider of this service is Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland ("Facebook").

According to Facebook, the data collected is also transmitted to the USA and other third countries and stored on Facebook servers in the USA or in other third countries. We have concluded a joint processing agreement (Controller Addendum) with Facebook. This agreement sets out the data processing operations that we, or Facebook, are responsible for when you visit our Facebook page.

You can view this agreement at the following link:

[www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum)

You can adjust your advertising settings independently in your user account. To do this, click on the following link and log in:

[www.facebook.com/settings](https://www.facebook.com/settings)

Details can be found in Facebook's privacy policy:

[www.facebook.com/about/privacy/](https://www.facebook.com/about/privacy/)

### Web message service "X" (formerly Twitter)

We have an X-profile. This service is provided by X Corp., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA. Within the European Union, X Corp. is represented by Twitter International Unlimited Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07 IRELAND (hereinafter: "X"). X offers the so-called "Tweet" function.

This allows messages up to 280 characters long to be published in one's own X account, even with website links. If you use X's "Tweet" function on our website, the respective website will be linked to your account on X and may be publicly announced there. Data is also transferred to X.

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We have no knowledge of the content of the transmitted data and its use by X. Therefore, for more information, consult X's privacy policy: <https://x.com/de/privacy>

X offers you the opportunity to set your own data protection settings under the following link: <https://x.com/settings/account>.

### LinkedIn

The platform is provided by LinkedIn Corporation (LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2 Ireland). LinkedIn is solely responsible for the processing of personal data when you visit our LinkedIn profile.

We have entered into a Data Processing Agreement with LinkedIn that governs the following operations: the processing of personal data that we upload or otherwise provide to LinkedIn as part of the Services, the processing of personal data by LinkedIn on our behalf in connection with the Services, and the processing of any personal data; that LinkedIn uploads or otherwise makes available to us in connection with the Services. The agreement is available at: <https://de.linkedin.com/legal//dpa>.

Please note that according to the LinkedIn Privacy Policy, personal data will also be processed by LinkedIn in the USA or other third countries. LinkedIn says it only transfers personal data to countries for which an adequacy decision has been issued by the European Commission in accordance with Art. 45 GDPR or on the basis of suitable safeguards in accordance with Art. 46 GDPR.

Further information on the processing of personal data by LinkedIn can be found here: <https://www.linkedin.com/legal/privacy-policy>

## 2.13 Data protection for applications and in the application process

The controller collects and processes the personal data of applicants for the purpose of handling the application process and for deciding on the establishment of an employment relationship. This is done on the basis of Art. 88 (1) GDPR in conjunction with Section 26 of the Federal Data Protection Act (BDSG) and Art. 6 (1) (b) GDPR – pre-contractual measures.

The processing can also be carried out electronically by e-mail or via the <https://jobs.workrate.eu/> job portal .

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We only process personal data that we receive from you as part of the application process. This may include general information about you, such as your name, address, and contact details, information about your professional qualifications and education, or information about your professional development, or other information that you provide to us in connection with your application.

We process the data, for example, with PDF software as well as with Microsoft 365 (including e-mail communication) of Microsoft Corporation Inc. Ireland or Redmond WA, 98052, USA. Your data may also reach the USA under certain circumstances. Applications sent to us by e-mail are stored on our servers.

The processing of this personal data is carried out for the purpose of contacting you by e-mail, telephone or post, as well as for the implementation of the application process and the decision on the establishment of an employment relationship.

We would like to point out that we may also view and use publicly available data as part of the application process. This includes, for example, data that can be found in search engines or that you publish about yourself in professional social networks (e.g. Xing, LinkedIn, Stepstone). We may also contact you via professional social networks. This processing is a pre-contractual measure for the preparation and initiation of a contract in accordance with Art. 6 (1) (b) GDPR. The categories of data processed include data about you and contact details, as well as other data that you make publicly available (e.g. photos, professional career, etc.). For this purpose, we only process personal data that is related to the planned vacancy.

The legal basis is primarily Art. 88 GDPR in conjunction with § 26 BDSG (new) (data processing for the purposes of the employment relationship) and Art. 6, para. 1 lit. b) GDPR (pre-contractual measures and performance of contract). If an applicant provides us with documents that contain "special categories of personal data" within the meaning of Article 9 (1) GDPR, the legal basis for the processing of this data is Article 9 (2) (a) GDPR (explicit consent), as the data was transmitted voluntarily and consciously. If this includes data that is necessary for the exercise of the profession, the legal basis is Art. 9 (2) (b) GDPR – Performance of Contract.

If, after completion of the application process, the data may be required for legal prosecution or legal defense, data processing may be carried out on the basis of the requirements of Art. 6 (1) (f) GDPR for the purpose of safeguarding legitimate interests. Our interest then lies in asserting or defending claims.

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### Consent / Data Processing for the Talent Pool

If you give us your consent to this, we may also store your application data after the application process has been completed so that we can inform you in the future about job offers from our company that may be of interest to you. The legal basis for this is Art. 6 (1) (a) and 88 GDPR in conjunction with Section 26 (2) BDSG. You give your consent voluntarily.

A revocation or if you do not wish to give consent to the 'talent pool' will not have any negative effects or disadvantages for your application.

After receipt of your application, your applicant data will be passed on by the management and to the executives relevant to the assessment of your application and reviewed by them. The HR department organizes and controls the application process. In principle, only those persons who need it for the proper running of the application process have access to your data. Your data will be treated confidentially and will not be passed on to unauthorized third parties.

For the efficient implementation of application procedures, we use a collaborative applicant management system of Recrutee B.V., Keizersgracht 313, 1016 EE Amsterdam, Netherlands (hereinafter referred to as "Recrutee"). We have concluded a contract with the provider for order processing in accordance with Art. 28 GDPR in order to ensure compliance with the data protection regulations.

The job portal and its functionalities are made available to us by Recrutee on an external website (<https://jobs.workrate.eu/>). You can view Recrutee's privacy policy [here](#) , and you can find the privacy policy for our job portal [here](#).

If the controller does not conclude an employment contract with the applicant, the application documents will be automatically deleted six months after the rejection decision is announced, provided that deletion does not conflict with any contractual, statutory or other legitimate interests of the controller. Other legitimate interest in this sense is, for example, a burden of proof for defense in proceedings under the General Equal Treatment Act (AGG).

If we may continue to store your data on the basis of your consent even after the application process has been completed in order to inform you of other job offers of interest to you in our company, this will be done for a maximum of 24 months; afterwards, your data will be deleted immediately, counting from the date of your last consent.

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## 3 Your rights

### 3.1 Information, blocking, deletion and correction

Within the framework of the applicable legal provisions, you have the right to free information about your stored personal data, its origin and recipients and the purpose of the data processing and, if necessary, a right to correction, blocking or deletion of this data. For this and other questions on the subject of personal data, you can contact us or our data protection officer at any time at the address given in the imprint.

### 3.2 Withdrawal of your consent to data processing

Many data processing operations are only possible with your explicit consent. You can revoke any consent you have already given at any time. All you need to do is send us an informal message by e-mail. The lawfulness of the data processing carried out up to the time of revocation remains unaffected by the revocation.

### 3.3 Right to object to data collection and direct marketing

If the data processing is carried out on the basis of Art. 6 (1) (a) or (f) GDPR (consent or legitimate interest), you have the right to object to the processing of your personal data at any time on grounds relating to your particular situation; this also applies to profiling based on these provisions. The respective legal basis on which processing is based can be found in this data protection notice. If you object, we will no longer process your personal data unless we can demonstrate compelling grounds for the processing that outweigh your interests, rights and freedoms or the processing serves to assert, exercise or defend legal claims (objection pursuant to Art. 21 (1) GDPR).

If you are a customer of ours, your data may also be used for direct marketing if the same or similar topics are related to the services you have requested. If your personal data is processed for the purpose of direct marketing, you have the right to object at any time to the processing of personal data concerning you for the purpose of such advertising; this also applies to profiling, insofar as it is related to such direct advertising. If you object, your personal data will no longer be used for the purpose of direct marketing (objection pursuant to Art. 21 para. 2 GDPR).

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### 3.4 Right to data portability

You have the right to have data that we process automatically on the basis of your consent or in fulfilment of a contract handed over to you or to a third party in a common, machine-readable format. If you request the direct transfer of the data to another controller, this will only be done to the extent that this is technically feasible.

### 3.5 Right to restriction of processing

You have the right to request the restriction of the processing of your personal data. You can contact us at any time at the address given in the imprint. The right to restriction of processing exists in the following cases:

- If you contest the accuracy of your personal data held by us, we will usually need time to verify this. For the duration of the audit, you have the right to request the restriction of the processing of your personal data.
- If the processing of your personal data was / is unlawful, you can request the restriction of data processing instead of deletion.
- If we no longer need your personal data, but you need it to exercise, defend or assert legal claims, you have the right to request the restriction of the processing of your personal data instead of erasure.
- If you have filed an objection in accordance with Art. 21 (1) GDPR, a balancing of your interests and ours must be carried out. As long as it has not yet been determined whose interests prevail, you have the right to request the restriction of the processing of your personal data.

If you have restricted the processing of your personal data, this data may only be processed with your consent or for the establishment, exercise or defense of legal claims, or for the protection of the rights of another natural or legal person, or for reasons of important public interest of the European Union or of a Member State.

## 4 Changes to our privacy policy

In order to ensure that our data protection information always complies with the current legal requirements, we reserve the right to make changes at any time. This also applies in the event that the data protection notice has to be adapted due to new or revised services, for example new services. The new data protection information will then take effect on your next visit to our offer. This data protection notice is as of July 2025.

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