

# PRIVACY POLICY

Information on processing of personal data



### Introduction and structure of the document

We, the company ConverterTec Deutschland GmbH (hereinafter named „the company“, „we“ or „us“), thank you for visiting our website and for your interest in our company and our services. Your personal data will only be processed in accordance with the provisions of German and European data protection law.

Data protection law obliges us, as the entity responsible for data processing, to ensure the protection of your personal data through a variety of measures. One of these obligations is to inform you transparently about the type, scope, purpose, duration and legal basis of the data processing (cf. Art. 13 and 14 EU-DSGVO). In the following, we also address you as the person affected by the data processing with „customer“, „user“, „you“ or „data subject“. In this privacy policy, we inform you about how your personal data is processed by us.

Our privacy policy has a modular structure. It consists of a general part for any processing of personal data and processing situations that come into play and a special part, the content of which relates in each case only to the processing situation specified there. It is possible that we will use this online document to also inform you about processing operations that do not primarily take place on the website. You will find these in the special section of the document. If you wish to navigate quickly in the document, many browsers offer a search function via the key combination „CTRL key+f“.

### Definitions

Following the example of Art. 4 EU GDPR, this document is based on the following definitions:

„Personal data“ (Art. 4 No. 1 EU GDPR) means any information relating to an identified or identifiable natural person („data subject“). A person is identifiable if he or she can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, an online identifier, location data or by means of information relating to his or her physical, physiological, genetic, mental, economic, cultural or social identity characteristics.

The identifiability can also be given by means of a linkage of such information or other additional knowledge. The origin, form or embodiment of the information is irrelevant (photographs, video or audio recordings may also contain personal data).

„Processing“ (Art. 4 No. 2 EU GDPR) means any operation which involves the handling of personal data, whether or not by means of automated (i.e. technology-based) processes. This includes, in particular, collection (i.e., acquisition), recording, organization, arrangement, storage, adaption or modification, readout, query, use, disclosure by transmission, dissemination or otherwise making available, alignment, combination, restriction, deletion or destruction of personal data, as well as the change of a purpose or intended use on which a data processing was originally based.

„Controller“ (Art. 4 No. 7 EU GDPR) means the natural or legal person, public authority, agency or other body which alone or jointly with others determines the purposes and means of the processing of personal data.

„Third party“ (Art. 4 No. 10 EU GDPR) means any natural or legal person, public authority, agency or other body other than the data subject, the controller, the processor and the persons who are authorized to process the personal data under the direct responsibility of the controller or processor.“

Processor“ (Art. 4 No. 8 EU GDPR) is a natural or legal person, authority, institution or other body that processes personal data on behalf of the controller, in particular in accordance with the controller’s instructions (e.g. IT service provider). In particular, a processor is not a third party in the sense of data protection law.

„Consent“ (Art. 4 No. 11 EU GDPR) of the data subject means any freely given, specific, informed and unambiguous indication of his or her wishes in the form of a statement or other unambiguous affirmative act by which the data subject signifies his or her agreement to the processing of personal data relating to him or her.

### **Name and address of the responsible entity for processing**

Please refer to the imprint details on our website for the entity responsible for processing your personal data within the meaning of Art. 4 No. 7 EU-DSGVO, as well as contact details and other information about our company.

### **Contact data of the data protection officer**

Our data protection team, consisting of data protection coordinators and our data protection officer, are available at all times to answer any questions you may have and to act as your contact person on the subject of data protection at our company.

You can reach the data protection team by mail at our address given in the imprint with the addition „data protection team“ and by e-mail at [dataprotection@convertertec.com](mailto:dataprotection@convertertec.com)

### **Your rights**

You can exercise your rights as a data subject regarding your processed personal data at any time by contacting us using the contact details provided at the beginning of this document. You facilitate your request if you contact the data protection team directly.

As the data subject, you have the right:

- in accordance with Art. 15 EU-GDPR to request information about your data processed by us. In particular, you can request information about the processing purposes, the category of data, the categories of recipients to whom your data has been or will be disclosed, the planned storage period, the existence of a right to rectification, deletion, restriction of processing or objection, the existence of a right of complaint, the origin of your data if it was not collected by us, as well as the existence of automated decision-making, including profiling, and, if applicable, meaningful information about its details;
- in accordance with Art. 16 EU-GDPR to demand the correction of incorrect or the completion of your data stored by us without delay;
- in accordance with Art. 17 EU-GDPR to request the deletion of your data stored by us, unless the processing is necessary for the exercise of the right to freedom of expression and information, for compliance with a legal obligation, for reasons of public interest or for the assertion, exercise or defense of legal claims

- in accordance with Art. 18 EU-GDPR, to request the restriction of the processing of your data, insofar as the accuracy of the data is disputed by you or the processing is unlawful;
- in accordance with Art. 20 EU-GDPR to receive your data that you have provided to us in a structured, common and machine-readable format or to request the transfer to another controller („data portability“);;
- in accordance with Art. 21 EU GDPR to object to the processing provided that the processing is based on Art. 6 (1) lit. e or lit. f EU GDPR. This is particularly the case if the processing is not necessary for fulfilling a contract with you. Unless it is an objection to direct marketing, when exercising such an objection, we ask you to explain the reasons why we should not process your data as we have done. In the event of your justified objection, we will review the situation and either discontinue or adjust the data processing or show you our compelling legitimate grounds on the basis of which we will continue the processing. For many services on our websites that process personal data on the basis of Art. 6 (1) f EU-DSGVO, the objection can be implemented technically via technologies available or to be installed in the browser, e.g. by blocking JavaScripts or cookies;
- in accordance with Art. 7 (3) EU GDPR, to revoke your consent given once (also prior to the application of the EU GDPR, i.e. prior to 25.5.2018) - i.e. your voluntary will, made understandable in an informed manner and unambiguously by a declaration or other unambiguous confirming act, that you agree to the processing of the personal data in question for one or more specific purposes - at any time vis-à-vis us, if you have given such consent. This has the consequence that we may no longer continue the data processing, which was based on this consent, for the future and
- in accordance with Art. 77 EU GDPR to complain to a data protection supervisory authority about the processing of your personal data in our company, such as the data protection supervisory authority responsible for us.

### Legal basis of data processing

By law, in principle, any processing of personal data is allowed only if the data processing falls under one of the following justifications:

Art. 6 para. 1 lit. a EU GDPR („consent“): If the data subject has voluntarily, in an informed manner and unambiguously indicated by means of a statement or other unambiguous affirmative act that he or she consents to the processing of personal data concerning him or her for one or more specific purposes;

Art. 6 para. 1 lit. b EU GDPR („Contract“): if the processing is necessary for the fulfillment of a contract to which the data subject is party or for the performance of pre-contractual measures taken at the data subject's request;

Art. 6 para. 1 lit. c EU GDPR („legal obligation“): If processing is necessary for compliance with a legal obligation to which the controller is subject (e.g. a legal obligation to keep records);

Art. 6 para 1 lit. d EU GDPR: When processing is necessary to protect the vital interests of the data subject or another natural person;

Art. 6 para. 1 lit. e EU GDPR: Where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; or

Art. 6 para. 1 lit. f EU GDPR („Legitimate Interests“): If the processing is necessary to protect the legitimate (in particular legal or economic) interests of the controller or a third party, unless the conflicting interests or rights of the data subject override (in particular if the data subject is a minor). Insofar as the processing of personal data is based on Art. 6 para. 1 lit. f EU GDPR, the aforementioned purposes also constitute our legitimate interests.

In the following, we indicate the applicable legal basis for each of the processing operations we carry out. A processing operation may also be based on several legal bases.

### Data deletion and storage duration

For the processing operations carried out by us, we indicate below in each case how long the data will be stored by us and when it will be deleted or blocked. In the case of consent, the data deletion and storage duration specified in the consent request is decisive. If no explicit sto-

rage duration is specified below, your personal data will be deleted or blocked as soon as the purpose or legal basis for the storage no longer applies. As a matter of principle, your data will only be stored in the territory of the Federal Republic of Germany, in a member state of the European Union (EU) or in another contracting state of the Agreement on the European Economic Area (EEA). Possible exceptions to this are outlined in the following sections and processing procedures.

However, storage may take place beyond the specified time in the event of a (threatened) legal dispute with you or other legal proceedings or if storage is provided for by statutory provisions to which we are subject as the responsible party (e.g. § 257 HGB, § 147 AO). If the storage duration prescribed by the legal regulations expires, the personal data will be blocked or deleted unless further storage by us is necessary and there is a legal basis for this.

For the processing operations carried out by us, we indicate below in each case how long the data will be stored by us and when it will be deleted or blocked. In the case of consent, the data deletion and storage duration specified in the consent request is decisive. If no explicit storage duration is specified below, your personal data will be deleted or blocked as soon as the purpose or legal basis for the storage no longer applies. As a matter of principle, your data will only be stored in the territory of the Federal Republic of Germany, in a member state of the European Union (EU) or in another contracting state of the Agreement on the European Economic Area (EEA). Possible exceptions to this are outlined in the following sections and processing procedures.

However, storage may take place beyond the specified time in the event of a (threatened) legal dispute with you or other legal proceedings or if storage is provided for by statutory provisions to which we are subject as the responsible party (e.g. § 257 HGB, § 147 AO). If the storage duration prescribed by the legal regulations expires, the personal data will be blocked or deleted unless further storage by us is necessary and there is a legal basis for this.



### **Data security: website, e-Mail, Fax**

We use technical and organizational security measures to protect your data against accidental or intentional manipulation, partial or complete loss, destruction or against unauthorized access by third parties (e.g. TLS encryption for our website), taking into account the state of the art, implementation costs and the scope, context and purpose of the processing, as well as the existing risks (including their probability and impact) for the data subject. Our security measures are continuously improved in line with technological developments.

For secure data transmission on the Internet, we use the hybrid encryption protocol Transport Layer Security (TLS), more widely known by its predecessor name Secure Sockets Layer Software (SSL). This software encrypts the information that is transmitted by you. All information relevant to data protection is stored in encrypted form in a protected database.

We would like to point out that the confidentiality of e-mail cannot be proven. Although we offer transport encryption (TLS) via our mail servers, confidentiality may depend on various mail relay servers over which we have no control: Whether these also use TLS and whether they evaluate the emails is beyond our control.

When you send us a fax, the transmission takes place via the Internet Protocol (FoIP). The transmission is technically identical to sending an e-mail or web page data. We do not know if an IP-based service encrypts data accordingly the confidentiality of the sent data is not guaranteed. We do not recommend sending sensitive data by fax.

We will be happy to provide you with further information upon request. Please get in touch with our data protection team.

### **Cooperation with contract processors**

As with any larger company, we also use external service providers to handle our business transactions, e.g. for the areas of IT, logistics, telecommunications: parcel delivery, sending letters or e-mails, analyzing our databases, advertising measures, processing payments, sales and marketing. These service providers have access to personal data needed to perform their

tasks. However, they may not use this data for any other purpose. Processors only act on our instructions and have been contractually obligated within the meaning of Art. 28 EU-DSGVO to comply with the provisions of data protection law. Processors are not third parties.

### **Precondition for the transfer of personal data to third countries**

In the framework of our business relationships, your personal data may be transferred or disclosed to third party companies. These may also be located outside the European Economic Area (EEA), i.e. in third countries. Such processing is carried out exclusively for the fulfillment of contractual and business obligations and to maintain your business relationship with us. We will inform you about the respective details of the transfer in the following at the relevant points. The European Commission certifies that some third countries have a level of data protection comparable to the EEA standard by means of so-called adequacy decisions. However, in other third countries to which personal data may be transferred, there may not be a consistently high level of data protection due to a lack of legal provisions. If this is the case, we ensure that data protection is adequately guaranteed. This is possible through binding company regulations, standard contractual clauses of the European Commission for the protection of personal data, certificates or recognized codes of conduct. Please contact our data protection team if you would like more information on this.

### **Automated decision making**

We do not intend to use any personal data collected from you for any automated decision making process (including profiling).

### **Obligation to provide personal data**

We do not make the conclusion of contracts with us dependent on you providing us with personal data in advance. As a customer, you are under no legal or contractual obligation to provide us with your personal data; however, we may only be able to provide certain services to a limited extent or not at all if you do not provide the necessary data. If this should exceptionally be the case within the scope of the products or processing procedures presented below, you will be informed separately.

### **Legal obligation to transmit certain data**

We may be subject to a specific legal or statutory obligation to provide the lawfully processed personal data to third parties, in particular public bodies (Art. 6 (1) c EUGDPR).

### **Change of privacy policy**

In the context of the further development of data protection law, as well as technological or organizational changes, this document is regularly reviewed for the need for adaptation or additions. We reserve the right to change this privacy policy at any time in compliance with the applicable data protection regulations with effect for the future. We will publish the changes here. Current status: 16.05.2022.

### **Informations on the processing of personal data in special processing operations**

The following sections describe processing operations grouped by different categories of individuals whose data are processed („data subjects“).

#### **Website visitors**

Information about our company and the services we offer can be found in particular at [www.convertertec.com](http://www.convertertec.com) together with the associated subpages (hereinafter collectively referred to as „websites“). When you visit our websites, personal data will be processed.

Your data will only be processed for as long as is necessary to achieve the above-mentioned processing purposes; the legal bases stated in the context of the processing purposes apply accordingly. Third parties engaged by us will store your data on their system for as long as is necessary in connection with the provision of the services for us in accordance with the respective order.

The following categories of recipients, which are usually processors, may receive access to your personal data:

Service providers for the operation of our website and the processing of data stored or transmitted by the systems (e.g. for data center services, payment processing, IT security). The legal basis for the transfer is then Art. 6 para. 1 lit. b or lit. f EU GDPR, insofar as they are not order processors;

Government agencies/authorities, insofar as this is necessary to fulfill a legal obligation. The legal basis for the disclosure is then Art. 6 para. 1 lit. c EU GDPR;

Persons employed to carry out our business operations (e.g. auditors, banks, insurance companies, legal advisors, supervisory authorities, parties involved in company acquisitions or the establishment of joint ventures). The legal basis for the disclosure is then Art. 6 para. 1 lit. b or lit. f EU GDPR.

In addition, we will only disclose your personal data to third parties if you have given your express consent to do so in accordance with Art. 6 (1) a EU-DSGVO.

The following sections describe processing operations grouped by different categories of individuals whose data are processed („data subjects“).

#### **Personal data processed on the website/log data**

During the informative use of the websites, the following categories of personal data are collected, stored and processed by us. When you visit our websites, a so-called log data record (so-called server log files) is stored temporarily and anonymously on our web server. This consists in particular of:

- the page from which the page was requested (so-called referrer URL)
- the name and URL of the requested page
- the date and time of the request
- the description of the type, language and version of the web browser used
- the IP address of the requesting computer
- the amount of data transferred
- the operating system
- the message whether the call was successful (access status/HTTP status code)
- the GMT time zone difference

The processing of the log data serves statistical purposes and the improvement of the quality of our website, in particular the stability and security of the connection (legal basis is Art. 6 para. 1 lit. f EU GDPR).

It is possible that further information that your operating system, your browser and/or other of your technologies provide to our web servers, we process at short notice to provide the websites. The legal basis for this is also Art. 6 para. 1 lit. f EU GDPR.

### **Services to store information on your terminal or to access information already stored on your terminal (cookies, plugins, JavaScript ...)**

On our websites, we use services and technologies to store information on your terminal device and/or technologies to access information that is already stored on your terminal device. These technologies can be cookies, for example. Cookies are text files and/or entries in the browser's own database, which assigns the browser you are using by a characteristic string. In the process, certain information flows between the entity that sets the cookie and your terminal device.

Cookies and other services may contain data that make it possible to recognize the device used. In some cases, cookies and other technologies only contain information about certain settings, which are not personally identifiable. You can reject or technically prevent some services, provided that your browser allows this. However, we would like to point out that in this case you will not be able to use all functions of our website to their full extent.

The help function in the menu bar of most web browsers explains, for example, how to prevent your browser from accepting new cookies, how to let your browser know when you receive a new cookie, or even how to delete all received cookies. You can also change your browser so that special technologies are not executed in your browser (e.g. JavaScript), which require the services. Insofar as the services on our websites process personal data on the basis of Art. 6 para. 1 lit. f EU GDPR; the objection can thus be implemented technically via these browser functions and technologies.

With regard to their function, services are again distinguished between:

Technical services: these are mandatory to move around the website, use basic functions

and ensure the security of the website; they do not collect information about you for marketing purposes, nor do they store which web pages you have visited;

Performance Service: these collect information about how you use our website, which pages you visit and, for example, whether errors occur during website use; they do not collect information that could identify you - all information collected is anonymous and is used only to improve our website and to find out what interests our users;

Advertising, Targeting & Sharing services, social media plugins: These are used to offer website users tailored advertising on the website or third-party offers and to measure the effectiveness of these offers. These services may also serve to improve the interactivity of our website with other services (e.g. social networks). Common to all services is that they store information on your terminal device and/or access information that is already stored on your terminal device.

In contrast to the functional distinction of services, the legislation distinguishes only between two purposes of services:

1. Services necessary to carry out the transmission of a message via a public telecommunications network and/or absolutely necessary for the provider of a telemedia service to be able to provide a telemedia service expressly requested by the user. Necessity may be based on technical, legal, economic, operational and/or contractual agreements.

2. Services for all other purposes.

Any use of services that are compellingly required technically, legally, economically, operationally and/or contractually in order to provide an expressly requested service may be based on a legal basis other than consent pursuant to Art. 6 (1) lit. a EU GDPR.

### **General services on your website**

We currently use the following services described above. Insofar as the processing is based on a consent pursuant to Art. 6 (1) lit. a EU GDPR, we also state the manner in which consent is requested.

### **Service: Contact form**

When using contact forms, the data you submit will be processed (e.g. gender, surname and first name, address, company, email address and the time of submission). The processing of contact form data is carried out for the processing of inquiries and the legal basis for this is based on Art. 6 para. 1 lit. b or lit. f EU GDPR.

### **Google (and Alphabet, if applicable) services, products and technologies**

In this section, we have summarized services offered by Alphabet Inc. (a listed U.S. holding company) and in particular by Google, which is part of the holding company.

#### **Service: Google Maps**

This website uses the Google Maps service to display maps and site plans, operated by the company Google Ireland Limited, registration number: 368047, Gordon House, Barrow Street, Dublin 4, Ireland.

Processing will only take place if you have given your consent in accordance with Art. 6 (1) a EU GDPR. Additional information on this possible processing can be found in the consent query within the consent management tool.

Provided that consent has been given, each time you call up the Google Maps service, information is stored on your terminal device and read in order to process user settings and data when displaying the page on which Google Maps is integrated.

#### **Service: Google Analytics**

This website uses the Google Analytics service, a web analysis service operated by the company Google Ireland Limited, registration number: 368047, Gordon House, Barrow Street, Dublin 4, Ireland.

Processing will only take place if you have given your consent in accordance with Art. 6 (1) a EU-DSGVO. Additional information on this possible processing can be found in the consent query within the consent management tool.

If consent is given, an analysis of your use of our websites and online services is made possible. In the process, information about your use of these websites and online services will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of

the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf.

#### **Service: Google reCAPTCHA**

We use the Google reCAPTCHA service on our websites, operated by the company Google Ireland Limited, registration number: 368047, Gordon House, Barrow Street, Dublin 4, Ireland. Processing will only take place if you have given your consent in accordance with Art. 6 (1) a EU-DSGVO. Additional information on this possible processing can be found in the consent query within the Consent Management Tool.

If consent has been given, we can use reCAPTCHA to check whether the data entry on our websites (e.g. in a contact form) is made by a human or by an automated program. For this purpose, reCAPTCHA analyzes the behavior of the website visitor based on various characteristics. This analysis starts automatically. For the analysis, reCAPTCHA evaluates various information (e.g. IP address, time spent by the website visitor on the website or mouse movements made by the user). The data collected during the analysis is forwarded to Google.

#### **Service: LinkedIn**

We use services such as the analysis and conversion tracking technology of LinkedIn Inc, 2029 Stierlin Ct, Mountain View, CA 94043, USA (LinkedIn) on our websites.

Processing will only take place if you have given your consent in accordance with Art. 6 Para. 1 lit. a EU GDPR. Additional information on this possible processing can be found in the consent query in the consent management tool.

If consent is given, data about your use of our website is collected and forwarded to LinkedIn, among other things for advertising purposes. We receive aggregated and anonymous reports from LinkedIn of ad activity and information about how you interact with our website.



## Applicants

You can apply to us in various ways. Regardless of how you apply to us, your applicant data will be processed exclusively for the purpose of processing your application and will be stored for a maximum of six months after the end of the selection process and then deleted unless you give us your consent to further processing in a talent pool.

In the context of an application, we process the following personal data from you:

- All data that you have provided to us in the course of the application process (e.g. in your application documents or interviews).
- If applicable, supplementary data that we have permissibly collected in the course of the application process (e.g. from public sources such as professional networks)
- this may also include special categories of personal data (e.g. severely disabled status, racial and ethnic origin, religious or ideological beliefs, or trade union membership), provided that these have been transmitted to us in one of the two aforementioned ways.

Legal basis is decision on the establishment of an employment relationship or after the establishment of the employment relationship for its implementation according to §26 para.1 BDSG-neu and Art. 6 para. 1 lit. b EU GDPR. After the end of the selection process, we retain all data for a further six months in order to be able to respond legally to such allegations in the event of possible disputes regarding the application process. This time-limited retention takes place on the basis of Art. 6 para. 1 lit. f EU-GDPR.

### Service: Applicant Portal

You have the option of applying to us via our applicant portal.

Please use the encrypted upload function contained therein to apply for jobs with us. Alternatively, you can also send us your application by e-mail, but please note that in this case we cannot guarantee the confidentiality of your data. Although we offer transport encryption (TLS) via our mail server, confidentiality may depend on various mail relay servers over which we have no control. Whether these also use TLS and whether they evaluate the e-mails is beyond our knowledge and influence. If you have any

concerns in this regard, please use the postal service for your application.

If you have any concerns in this regard, please use the postal service for your application.

### Service: Application by e-mail

You have the option of applying to us by e-mail. Please send your application documents to [bewerbung@convertertec.com](mailto:bewerbung@convertertec.com). We would like to point out that we cannot guarantee the confidentiality of your data when you apply by e-mail. Although we offer transport encryption (TLS) via our mail server, confidentiality may depend on various mail relay servers over which we have no control. Whether these also use TLS and whether they evaluate the e-mails is beyond our knowledge and influence. If you have any concerns in this regard, please use the postal service for your application.

### Business partners and information seekers

You have the option of contacting us by telephone, fax or e-mail. Please also refer to the section „Data security: website, e-mail, fax“

When you contact us by phone, we collect caller identification information (caller ID). So, if your phone number is not suppressed or withheld, we will see the phone number from which you call us. The phone number, call date and call time are automatically stored by our phone system and are only used to call you back if you have requested us to do so or if your call is dropped due to technical problems. This data is deleted after 4 weeks at the latest. We do not record calls.

If you contact us by e-mail, this will be stored and used for the purpose you have communicated to us in the e-mail (e.g. product order).

The same applies to contact by fax.

If you order products from us or request information material, we will create a customer account for you. The customer account contains the following data:

- The name and contact details of the company for which you are placing the order
- Your first and last name as contact person
- For each order processed through this customer account we store:
  - Date of order and delivery
  - ordered products
  - current order status

This data is required to process your order and/or inquiry and is only processed for this purpose (Art. 6 para. 1 lit. b or lit. f EU-DSGVO). Unless otherwise described, the deletion periods for this data are based on the statutory retention obligations to which we are subject.