

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").

The terms used are not gender-specific.

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Controller

HXS GmbH
Ungargasse 37
1030 Vienna
Austria / Europe

E-mail address:

office@hxs.at

Phone:

+43 (1) 344 1 344

Legal Notice:

<https://www.hxs.at/impressum/>

Contact information of the data protection officer

Peter Oskar Miller
hxs@datenschutzbeauftragter.at

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.
- Payment Data.
- Contact data.
- Content data.
- Contract data.
- Usage data.
- Meta, communication and process data.

Categories of Data Subjects

- Customers.
- Employees.
- Prospective customers.
- Communication partner.
- Users.
- Business and contractual partners.
- Persons depicted.

Purposes of Processing

- Provision of contractual services and customer support.
- Contact requests and communication.
- Security measures.
- Direct marketing.
- Web Analytics.
- Targeting.
- Office and organisational procedures.
- Conversion tracking.
- Clicktracking.

- A/B Tests.
- Managing and responding to inquiries.
- Feedback.
- Heatmaps.
- Marketing.
- Profiles with user-related information.
- Provision of our online services and usability.
- Assessment of creditworthiness.
- Information technology infrastructure.

Automated Individual Decision-Making

- Credit report.

Legal Bases for the Processing

Below you will find an overview of the legal basis of the GDPR on the basis of which we process personal data. Please note that in addition to the provisions of the GDPR, national data protection regulations may apply in your or our country of residence or domicile. If, in addition, more specific legal bases are applicable in individual cases, we will inform you of these in the data protection declaration.

- **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.

In addition to the data protection regulations of the GDPR, national regulations apply to data protection in Austria. This includes in particular the Federal Act on the Protection of Individuals with regard to the Processing of Personal Data (Data

Protection Act - DSGVO). In particular, the Data Protection Act contains special provisions on the right of access, rectification or cancellation, processing of special categories of personal data, processing for other purposes and transmission and automated decision making in individual cases.

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.

Masking of the IP address: If IP addresses are processed by us or by the service providers and technologies used and the processing of a complete IP address is not necessary, the IP address is shortened (also referred to as "IP masking"). In this process, the last two digits or the last part of the IP address after a full stop are removed or replaced by wildcards. The masking of the IP address is intended to prevent the identification of a person by means of their IP address or to make such identification significantly more difficult.

TLS encryption (https): To protect your data transmitted via our online services, we use TLS encryption. You can recognize such encrypted connections by the prefix https:// in the address bar of your browser.

Transmission 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, service providers commissioned with IT tasks or providers of services and content that are embedded in a website. In such cases, 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.

Data Processing in Third Countries

If we process data in a third country (i.e. outside the European Union (EU), the European Economic Area (EEA)) or the processing takes place in the context of the use of third party services or disclosure or transfer of data to other persons, bodies or companies, this will only take place in accordance with the legal requirements.

Subject to express consent or transfer required by contract or law, we process or have processed the data only in third countries with a recognised level of data protection, on the basis of special guarantees, such as a contractual obligation through so-called standard protection clauses of the EU Commission or if certifications or binding internal data protection regulations justify the processing (Article 44 to 49 GDPR, information page of the EU Commission: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection_en).

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 is 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. Our further information on individual processing operations may also contain additional and specific information on data retention and erasure applicable to the respective processing operations.

Use of Cookies

Cookies are small text files or other data records that store information on end devices and read information from the end devices. For example, to store the login status in a user account, the contents of a shopping cart in an e-shop, the contents accessed or the functions used. Cookies can also be used for various purposes, e.g. for purposes of functionality, security and convenience of online offers as well as the creation of analyses of visitor flows.

Information on consent: We use cookies in accordance with the statutory

provisions. Therefore, we obtain prior consent from users, except when it is not required by law. In particular, consent is not required if the storage and reading of information, including cookies, is strictly necessary in order to provide an information society service explicitly requested by the subscriber or user. Essential cookies usually include cookies with functions related to the display and operability of the onlineservice, load balancing, security, storage of users' preferences and choices or similar purposes related to the provision of the main and secondary functions of the onlineservice requested by users. The revocable consent will be clearly communicated to the user and will contain the information on the respective cookie use.

Information on legal bases under data protection law: The legal basis under data protection law on which we process users' personal data with the use of cookies depends on whether we ask users for consent. If users consent, the legal basis for processing their data is their declared consent. Otherwise, the data processed with the help of cookies is processed on the basis of our legitimate interests (e.g. in a business operation of our online services and improvement of its usability) or, if this is done in the context of the fulfillment of our contractual obligations, if the use of cookies is necessary to fulfill our contractual obligations. For which purposes the cookies are processed by us, we do clarify in the course of this privacy policy or in the context of our consent and processing procedures.

Retention period: With regard to the retention period, a distinction is drawn between the following types of cookies:

- **Temporary cookies (also known as "session cookies"):** Temporary cookies are deleted at the latest after a user has left an online service and closed his or her end device (i.e. browser or mobile application).
- **Permanent cookies:** Permanent cookies remain stored even after the terminal device is closed. For example, the login status can be saved, or preferred content can be displayed directly when the user visits a website again. Likewise, user data collected with the help of cookies can be used for reach measurement. Unless we provide users with explicit information about the type and storage duration of cookies (e.g., as part of obtaining consent), users should assume that cookies are permanent and that the storage period can be up to two years.

General information on revocation and objection (opt-out): Users can revoke the consent they have given at any time and also file an objection to processing in accordance with the legal requirements in Article 21 GDPR. Users can also declare their objection by means of the settings of their browser, e.g. by deactivating the use of cookies (whereby this may also limit the functionality of our online services). An objection to the use of cookies for online marketing purposes, can also be

declared via the websites <https://optout.aboutads.info> and <https://www.youronlinechoices.com/>.

- **Purposes of Processing:** Conversion tracking (Measurement of the effectiveness of marketing activities); Clicktracking; A/B Tests; Heatmaps ("Heatmaps" are mouse movements of the users, which are combined to an overall picture.); Profiles with user-related information (Creating user profiles); Provision of our online services and usability.
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); Consent (Article 6 (1) (a) GDPR).

Further information on processing methods, procedures and services used:

- **Processing Cookie Data on the Basis of Consent:** We use a cookie management solution in which users' consent to the use of cookies, or the procedures and providers mentioned in the cookie management solution, can be obtained, managed and revoked by the users. The declaration of consent is stored so that it does not have to be retrieved again and the consent can be proven in accordance with the legal obligation. Storage can take place server-sided and/or in a cookie (so-called opt-out cookie or with the aid of comparable technologies) in order to be able to assign the consent to a user or and/or his/her device. Subject to individual details of the providers of cookie management services, the following information applies: The duration of the storage of the consent can be up to two years. In this case, a pseudonymous user identifier is formed and stored with the date/time of consent, information on the scope of the consent (e.g. which categories of cookies and/or service providers) as well as the browser, system and used end device; **Legal Basis:** Consent (Article 6 (1) (a) GDPR).
- **Klaro!:** Cookie-Consent Manager; **Service provider:** KIProtect GmbH, Bismarckstr. 10-12, 10625 Berlin, Germany; **Website:** <https://kiprotect.com/de/klaro>; **Privacy Policy:** <https://kiprotect.com/resources/privacy>.
- **Microsoft Clarity:** Software for the analysis and optimisation of online services on the basis of feedback functions as well as pseudonymously conducted measurements and analyses of user behaviour, which may include in particular A/B tests (measurement of the preference and user-friendliness of different contents and functions), measurement of click paths and other interactions with contents and functions of the online services; **Service provider:** Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399 USA; **Legal Basis:** Consent (Article 6 (1) (a) GDPR); **Website:** <https://clarity.microsoft.com/>; **Privacy Policy:** <https://privacy.microsoft.com/en-GB/privacystatement>, Security information: <https://www.microsoft.com/en-GB/trust-center>.

Business 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 fulfill our contractual obligations. These include, in particular, the obligations to provide the agreed services, any update obligations and remedies in the event of warranty and other service disruptions. In addition, we process the data to protect our rights and for the purpose of administrative tasks associated with these obligations and company organization. Furthermore, we process the data on the basis of our legitimate interests in proper and economical business management as well as security measures to protect our contractual partners and our business operations from misuse, endangerment of their data, secrets, information and rights (e.g. for the involvement of telecommunications, transport and other auxiliary services as well as subcontractors, banks, tax and legal advisors, payment service providers or tax authorities). Within the framework of applicable law, we only disclose the data of contractual partners to third parties to the extent that this is necessary for the aforementioned purposes or to fulfill legal obligations. Contractual partners will be informed about further forms of processing, e.g. for marketing purposes, within the scope 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 online 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. The statutory retention period for documents relevant under tax law as well as for commercial books, inventories, opening balance sheets, annual financial statements, the instructions required to understand these documents and other organizational documents and accounting records is ten years and for received commercial and business letters and reproductions of sent commercial and business letters six years. The period begins at the end of the calendar year in which the last entry was made in the book, the inventory, the opening balance sheet, the annual financial statements or the management report was prepared, the commercial or business letter was received or sent, or the accounting document was created, furthermore the record was made or the other documents were created.

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.

- **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); Content data (e.g. text input, photographs, videos); Usage data (e.g. websites visited, interest in content, access times); Meta, communication and process data (e.g. IP addresses, time information, identification numbers, consent status).
- **Data subjects:** Prospective customers; Business and contractual partners; Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Provision of contractual services and customer support; Contact requests and communication; Office and organisational procedures; Managing and responding to inquiries; Information technology infrastructure (Operation and provision of information systems and technical devices, such as computers, servers, etc.).
- **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).

Further information on processing methods, procedures and services used:

- **Consulting:** We process the data of our clients, clients as well as interested parties and other clients or contractual partners (uniformly referred to as "clients") in order to provide them with our consulting 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 client relationship. 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 client, we disclose or transfer the client's data to third parties or agents, such as authorities, courts, subcontractors or in the field of IT, office or comparable services, taking into account the professional requirements; Legal Basis: Performance of a contract and prior requests (Article 6 (1) (b) GDPR); **Service provider:** undefined; **Website:** undefined; **Privacy Policy:** undefined.
- **Software and Platform Services:** We process the data of our users, registered and any test users (hereinafter uniformly referred to as "users") in order to provide them with our contractual services and on the basis of legitimate interests to ensure the security of our offer and to develop it further. The required details are identified as such within the context of the conclusion of the agreement, order or comparable contract and include the details required for the provision of services and invoicing as well as contact information in order to be able to hold any further consultations; **Legal**

Basis: Performance of a contract and prior requests (Article 6 (1) (b) GDPR).

- **Technical and Engineering services:** We process the data of our customers and clients (hereinafter uniformly referred to as "customers") in order to enable them to select, acquire or commission the selected services or works as well as associated activities and to pay for and make available such services or works or to perform such services or works. The required information is indicated as such within the framework of the conclusion of the agreement, order or equivalent contract and includes the information required for the provision of services and invoicing as well as contact information in order to be able to hold any consultations. Insofar as we gain access to the information of end customers, employees or other persons, we process it in accordance with the legal and contractual requirements; **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR).
- **Amazon Web Services (AWS):** Services in the field of the provision of information technology infrastructure and related services (e.g. storage space and/or computing capacities); **Service provider:** Amazon Web Services EMEA SARL, 38 avenue John F. Kennedy, 1855, Luxembourg; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://aws.amazon.com/>; **Privacy Policy:** <https://aws.amazon.com/privacy/>; **Data Processing Agreement:** <https://aws.amazon.com/compliance/gdpr-center/>; **Standard Contractual Clauses (Safeguarding the level of data protection when processing data in third countries):** Inclusion in the Data Processing Agreement.
- **Internet-Services:** Services in the field of the provision of information technology infrastructure and related services (e.g. storage space and/or computing capacities); **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).
- **Microsoft Cloud Services:** Cloud storage, cloud infrastructure services and cloud-based application software; **Service provider:** Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland, parent company: Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399 USA; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://microsoft.com>; **Privacy Policy:** <https://privacy.microsoft.com/de-de/privacystatement>, Security information: <https://www.microsoft.com/de-de/trustcenter>; **Data Processing Agreement:** <https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA>; **Standard Contractual Clauses (Safeguarding the level of data protection when processing data in third countries):** <https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA>.

- **Microsoft Single-Sign-On:** Authentication service; **Service provider:** Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland, parent company: Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399 USA; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.microsoft.com/en-gb/security/business/identity-access-management/single-sign-on>; **Privacy Policy:** <https://privacy.microsoft.com/en-gb/privacystatement>; **Further Information:** <https://www.microsoft.com/en-gb/trust-center>.

Providers and services used in the course of business

As part of our business activities, we use additional services, platforms, interfaces or plug-ins from third-party providers (in short, "services") in compliance with legal requirements. Their use is based on our interests in the proper, legal and economic management of our business operations and internal organization.

- **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); Content data (e.g. text input, photographs, videos); Contract data (e.g. contract object, duration, customer category); Usage data (e.g. websites visited, interest in content, access times).
- **Data subjects:** Customers; Prospective customers; Users (e.g. website visitors, users of online services); Business and contractual partners.
- **Purposes of Processing:** Provision of contractual services and customer support; Office and organisational procedures; Conversion tracking (Measurement of the effectiveness of marketing activities); Clicktracking; A/B Tests; Heatmaps ("Heatmaps" are mouse movements of the users, which are combined to an overall picture.); Profiles with user-related information (Creating user profiles); Provision of our online services and usability.
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); Consent (Article 6 (1) (a) GDPR).

Further information on processing methods, procedures and services used:

- **Microsoft Clarity:** Software for the analysis and optimisation of online services on the basis of feedback functions as well as pseudonymously conducted measurements and analyses of user behaviour, which may include in particular A/B tests (measurement of the preference and user-friendliness of different contents and functions), measurement of click paths and other

interactions with contents and functions of the online services; **Service provider:** Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399 USA; **Legal Basis:** Consent (Article 6 (1) (a) GDPR); **Website:** <https://clarity.microsoft.com/>; **Privacy Policy:** <https://privacy.microsoft.com/en-GB/privacystatement>, Security information: <https://www.microsoft.com/en-GB/trust-center>.

- **Microsoft Cloud Services:** Cloud storage, cloud infrastructure services and cloud-based application software; **Service provider:** Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland, parent company: Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399 USA; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://microsoft.com>; **Privacy Policy:** <https://privacy.microsoft.com/de-de/privacystatement>, Security information: <https://www.microsoft.com/de-de/trustcenter>; **Data Processing Agreement:** <https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA>; **Standard Contractual Clauses (Safeguarding the level of data protection when processing data in third countries):** <https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA>.
- **Microsoft Single-Sign-On:** Authentication service; **Service provider:** Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland, parent company: Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399 USA; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.microsoft.com/en-gb/security/business/identity-access-management/single-sign-on>; **Privacy Policy:** <https://privacy.microsoft.com/en-gb/privacystatement>; **Further Information:** <https://www.microsoft.com/en-gb/trust-center>.
- **Microsoft Teams:** Conference and communication software; **Service provider:** Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland, parent company: Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399 USA; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.microsoft.com/de-de/microsoft-365>; **Privacy Policy:** <https://privacy.microsoft.com/de-de/privacystatement>, Security information: <https://www.microsoft.com/de-de/trustcenter>; **Standard Contractual Clauses (Safeguarding the level of data protection when processing data in third countries):** <https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA>.

Credit Assessment

Insofar as we make advance payments or enter into comparable economic risks (e.g. when ordering on account), we reserve the right to obtain identity and credit information from specialised service providers (credit agencies) for the purpose of assessing the credit risk on the basis of mathematical-statistical procedures in order to safeguard legitimate interests.

We process the information received from credit agencies on the statistical probability of non-payment as part of an appropriate discretionary decision on the establishment, execution and termination of the contractual relationship. In the event of a negative result of the credit assessment, we reserve the right to refuse payment on account or any other advance payment.

In accordance with Article 22 GDPR, the decision as to whether we will provide goods or services prior to payment is made solely on the basis of an automated decision in the individual case, which our software makes on the basis of the information provided by the credit agency.

If we obtain the express consent of contractual partners, the legal basis for the credit information and the transmission of the customer's data to the credit agencies is consent. If no consent is obtained, the credit rating will be based on our legitimate interests in the security of our payment claims.

- **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).
- **Data subjects:** Customers; Prospective customers.
- **Purposes of Processing:** Assessment of creditworthiness.
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).
- **Automatisierte Entscheidungen im Einzelfall:** Credit report (Decision based on a credit report).

Further information on processing methods, procedures and services used:

- **KSV1870 - Kreditschutzverband von 1870:** Credit agency; **Service provider:** KSV1870 Holding AG, Wagenseilgasse 7, A-1120 Wien, Austria; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.ksv.at/>; **Privacy Policy:** <https://www.ksv.at/datenschutzerklaerung>.

Provision of online services and web hosting

We process user data in order to be able to provide them with our online services. For this purpose, we process the IP address of the user, which is necessary to transmit the content and functions of our online services to the user's browser or terminal device.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times); Meta, communication and process data (e.g. IP addresses, time information, identification numbers, consent status); Content data (e.g. text input, photographs, videos).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Provision of our online services and usability; Information technology infrastructure (Operation and provision of information systems and technical devices, such as computers, servers, etc.); Security measures.
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

Further information on processing methods, procedures and services used:

- **Provision of online offer on rented hosting space:** For the provision of our online services, we use storage space, computing capacity and software that we rent or otherwise obtain from a corresponding server provider (also referred to as a "web hoster"); **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).
- **Provision of online services on own/ dedicated server hardware:** For the provision of our online services, we use server hardware operated by us as well as, the storage space, computing capacity and software associated with it; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).
- **Collection of Access Data and Log Files:** The access to our online services is logged in the form of 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; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Retention period:** Log file information is stored for a maximum period of 30 days and then deleted or anonymized. Data, the further storage of which is

necessary for evidence purposes, are excluded from deletion until the respective incident has been finally clarified.

- **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; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).
- **SolarWinds:** Monitoring, analysis and management services with the purpose of ensuring the availability, performance, functionality and optimization of IT and cloud infrastructures; **Service provider:** SolarWinds Worldwide, LLC, 7171 Southwest Parkway Building 400, Austin, Texas, 78735, USA; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.solarwinds.com/>; **Privacy Policy:** <https://www.solarwinds.com/legal/privacy>; **Data Processing Agreement:** <https://www.solarwinds.com/en/legal/legal-documents>; **Standard Contractual Clauses (Safeguarding the level of data protection when processing data in third countries):** Inclusion in the Data Processing Agreement; **Further Information:** <https://www.solarwinds.com/trust-center>.

Contact and Inquiry Management

When contacting us (e.g. via mail, contact form, e-mail, telephone or via social media) as well as in the context of existing user and business relationships, the information of the inquiring persons is processed to the extent necessary to respond to the contact requests and any requested measures.

- **Processed data types:** 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 and process data (e.g. IP addresses, time information, identification numbers, consent status).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of Processing:** Contact requests and communication; Managing and responding to inquiries; Feedback (e.g. collecting feedback via online

form); Provision of our online services and usability.

- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); Performance of a contract and prior requests (Article 6 (1) (b) GDPR).

Further information on processing methods, procedures and services used:

- **LiveAgent:** Management of contact requests and communication; **Service provider:** Quality Unit, s. r. o. Vajnorska 100/A, 83104 Bratislava, Slovakia; **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.liveagent.com>; **Privacy Policy:** <https://www.liveagent.com/security-privacy-policy/>.

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 services, 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 service providers themselves. You should always use a current version of the messenger service 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 services, 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 services 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 messenger services. 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 services at any time. In the case of communication via messenger services, 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 services. This is the case if, for example, internal contractual matters require special secrecy or if an answer via the messenger services does not meet the formal requirements. In such cases we refer you to more appropriate communication channels.

- **Processed data types:** Contact data (e.g. e-mail, telephone numbers); Usage data (e.g. websites visited, interest in content, access times); Meta, communication and process data (e.g. IP addresses, time information, identification numbers, consent status); 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).

Further information on processing methods, procedures and services used:

- **Apple iMessage: Service provider:** Apple Inc., Infinite Loop, Cupertino, CA 95014, USA; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.apple.com/>; **Privacy Policy:** <https://www.apple.com/privacy/privacy-policy/>.
- **Microsoft Teams:** Microsoft Teams - Messenger; **Service provider:** Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland, parent company: Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399 USA; **Legal**

Basis: Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.microsoft.com/de-de/microsoft-365>; **Privacy Policy:** <https://privacy.microsoft.com/en-GB/privacystatement>, Security information: <https://www.microsoft.com/en-GB/trust-center>; **Standard Contractual Clauses (Safeguarding the level of data protection when processing data in third countries):** <https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA>.

- **Signal:** Signal Messenger with end-to-end encryption; **Service provider:** Privacy Signal Messenger, LLC 650 Castro Street, Suite 120-223 Mountain View, CA 94041, USA; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://signal.org/>; **Privacy Policy:** <https://signal.org/legal/>.

Video Conferences, Online Meetings, Webinars and Screen-Sharing

We use platforms and applications of other providers (hereinafter referred to as "Conference Platforms") for the purpose of conducting video and audio conferences, webinars and other types of video and audio meetings (hereinafter collectively referred to as "Conference"). When using the Conference Platforms and their services, we comply with the legal requirements.

Data processed by Conference Platforms: In the course of participation in a Conference, the Data of the participants listed below are processed. The scope of the processing depends, on the one hand, on which data is requested in the context of a specific Conference (e.g., provision of access data or clear names) and which optional information is provided by the participants. In addition to processing for the purpose of conducting the conference, participants' Data may also be processed by the Conference Platforms for security purposes or service optimization. The processed Data includes personal information (first name, last name), contact information (e-mail address, telephone number), access data (access codes or passwords), profile pictures, information on professional position/function, the IP address of the internet access, information on the participants' end devices, their operating system, the browser and its technical and linguistic settings, information on the content-related communication processes, i.e. entries in chats and audio and video data, as well as the use of other available functions (e.g. surveys). The content of communications is encrypted to the extent technically provided by the conference providers. If participants are registered as users with the Conference Platforms, then further data may be processed in accordance with the agreement with the respective Conference Provider.

Logging and recording: If text entries, participation results (e.g. from surveys) as well as video or audio recordings are recorded, this will be transparently

communicated to the participants in advance and they will be asked - if necessary - for their consent.

Data protection measures of the participants: Please refer to the data privacy information of the Conference Platforms for details on the processing of your data and select the optimum security and data privacy settings for you within the framework of the settings of the conference platforms. Furthermore, please ensure data and privacy protection in the background of your recording for the duration of a Conference (e.g., by notifying roommates, locking doors, and using the background masking function, if technically possible). Links to the conference rooms as well as access data, should not be passed on to unauthorized third parties.

Notes on legal bases: Insofar as, in addition to the Conference Platforms, we also process users' data and ask users for their consent to use contents from the Conferences or certain functions (e.g. consent to a recording of Conferences), the legal basis of the processing is this consent. Furthermore, our processing may be necessary for the fulfillment of our contractual obligations (e.g. in participant lists, in the case of reprocessing of Conference results, etc.). Otherwise, user data is processed on the basis of our legitimate interests in efficient and secure communication with our communication partners.

- **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 and process data (e.g. IP addresses, time information, identification numbers, consent status).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.); Users (e.g. website visitors, users of online services); Persons depicted.
- **Purposes of Processing:** Provision of contractual services and customer support; Contact requests and communication; Office and organisational procedures.
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

Further information on processing methods, procedures and services used:

- **TeamViewer:** Conference and communication software; **Service provider:** TeamViewer GmbH, Jahnstr. 30, 73037 Göppingen, Germany; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.teamviewer.com/en/>; **Privacy Policy:** <https://www.teamviewer.com/en/privacy-policy/>.

Cloud Services

We use Internet-accessible software services (so-called "cloud services", also referred to as "Software as a Service") provided on the servers of its providers for the storage and management of content (e.g. document storage and management, exchange of documents, content and information with certain recipients or publication of content and information).

Within this framework, personal data may be processed and stored on the provider's servers insofar as this data is part of communication processes with us or is otherwise processed by us in accordance with this privacy policy. This data may include in particular master data and contact data of data subjects, data on processes, contracts, other proceedings and their contents. Cloud service providers also process usage data and metadata that they use for security and service optimization purposes.

If we use cloud services to provide documents and content to other users or publicly accessible websites, forms, etc., providers may store cookies on users' devices for web analysis or to remember user settings (e.g. in the case of media control).

- **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 and process data (e.g. IP addresses, time information, identification numbers, consent status).
- **Data subjects:** Customers; Employees (e.g. Employees, job applicants); Prospective customers; Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of Processing:** Office and organisational procedures; Information technology infrastructure (Operation and provision of information systems and technical devices, such as computers, servers, etc.).
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

Further information on processing methods, procedures and services used:

- **Microsoft Cloud Services:** Cloud storage, cloud infrastructure services and cloud-based application software; **Service provider:** Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland, parent company: Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399 USA; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://microsoft.com>; **Privacy Policy:** <https://privacy.microsoft.com/de-de/privacystatement>, Security

information: <https://www.microsoft.com/de-de/trustcenter>; **Data Processing Agreement:**
<https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA>; **Standard Contractual Clauses (Safeguarding the level of data protection when processing data in third countries):**
<https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA>.

Web Analysis, Monitoring and Optimization

Web analysis is used to evaluate the visitor traffic on our website and may include the behaviour, interests or demographic information of users, such as age or gender, as pseudonymous values. With the help of web analysis we can e.g. recognize, at which time our online services or their functions or contents are most frequently used or requested for repeatedly, as well as which areas require optimization.

In addition to web analysis, we can also use test procedures, e.g. to test and optimize different versions of our online services or their components.

Unless otherwise stated below, profiles, i.e. data aggregated for a usage process, can be created for these purposes and information can be stored in a browser or in a terminal device and read from it. The information collected includes, in particular, websites visited and elements used there as well as technical information such as the browser used, the computer system used and information on usage times. If users have agreed to the collection of their location data from us or from the providers of the services we use, location data may also be processed.

Unless otherwise stated below, profiles, that is data summarized for a usage process or user, may be created for these purposes and stored in a browser or terminal device (so-called "cookies") or similar processes may be used for the same purpose. The information collected includes, in particular, websites visited and elements used there as well as technical information such as the browser used, the computer system used and information on usage times. If users have consented to the collection of their location data or profiles to us or to the providers of the services we use, these may also be processed, depending on the provider.

The IP addresses of the users are also stored. However, we use any existing IP masking procedure (i.e. pseudonymisation by shortening the IP address) to protect the user. In general, within the framework of web analysis, A/B testing and optimisation, no user data (such as e-mail addresses or names) is stored, but pseudonyms. This means that we, as well as the providers of the software used, do not know the actual identity of the users, but only the information stored in their

profiles for the purposes of the respective processes.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times); Meta, communication and process data (e.g. IP addresses, time information, identification numbers, consent status).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Web Analytics (e.g. access statistics, recognition of returning visitors); Profiles with user-related information (Creating user profiles); Targeting (e.g. profiling based on interests and behaviour, use of cookies); Provision of our online services and usability.
- **Security measures:** IP Masking (Pseudonymization of the IP address).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR).

Further information on processing methods, procedures and services used:

- **Google Analytics:** Web analytics, reach measurement and measurement of user traffic; **Service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; **Legal Basis:** Consent (Article 6 (1) (a) GDPR); **Website:** <https://marketingplatform.google.com/intl/en/about/analytics/>; **Privacy Policy:** <https://policies.google.com/privacy>; **Data Processing Agreement:** <https://business.safety.google/adsprocessor/terms/>; **Standard Contractual Clauses (Safeguarding the level of data protection when processing data in third countries):** <https://business.safety.google/adsprocessor/terms/>; **Opt-Out:** Opt-Out-Plugin: <https://tools.google.com/dlpage/gaoptout?hl=en>, Settings for the Display of Advertisements: <https://adssettings.google.com/authenticated>; **Further Information:** <https://privacy.google.com/businesses/adsservices> (Types of processing and data processed).

Profiles in Social Networks (Social Media)

We maintain online presences within social networks and process user data in this context in order to communicate with the users active there or to offer information about us.

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.

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:** 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 and process data (e.g. IP addresses, time information, identification numbers, consent status).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Contact requests and communication; Feedback (e.g. collecting feedback via online form); Marketing.
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

Further information on processing methods, procedures and services used:

- **LinkedIn:** Social network; **Service provider:** LinkedIn Ireland Unlimited Company, Wilton Plaza Wilton Place, Dublin 2, Ireland; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.linkedin.com>; **Privacy Policy:** <https://www.linkedin.com/legal/privacy-policy>; **Data Processing Agreement:** <https://legal.linkedin.com/dpa>; **Standard Contractual Clauses (Safeguarding the level of data protection when processing data in third countries):** <https://legal.linkedin.com/dpa>; **Opt-Out:** <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.

Plugins and embedded functions and content

Within our online services, we integrate functional and content elements that are obtained from the servers of their respective providers (hereinafter referred to as "third-party providers"). These may, for example, be graphics, videos or city maps (hereinafter uniformly referred to as "Content").

The integration always presupposes that the third-party providers of this content process the IP address of the user, since they could not send the content to their browser without the IP address. The IP address is therefore required for the presentation of these contents or functions. We strive to use only those contents, whose respective offerers use the IP address only for the distribution of the contents. Third parties may also use so-called pixel tags (invisible graphics, also known as "web beacons") for statistical or marketing purposes. The "pixel tags" can be used to evaluate information such as visitor traffic on the pages of this website. The pseudonymous information may also be stored in cookies on the user's device and may include technical information about the browser and operating system, referring websites, visit times and other information about the use of our website, as well as may be linked to such information from other sources.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times); Meta, communication and process data (e.g. IP addresses, time information, identification numbers, consent status).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Provision of our online services and usability; Provision of contractual services and customer support.
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

Further information on processing methods, procedures and services used:

- **Google Fonts (Provision on own server):** Provision of font files for the purpose of a user-friendly presentation of our online services; **Service provider:** The Google Fonts are hosted on our server, no data is transmitted to Google; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).
- **reCAPTCHA:** We integrate the "reCAPTCHA" function to be able to recognise whether entries (e.g. in online forms) are made by humans and not by automatically operating machines (so-called "bots"). The data processed may include IP addresses, information on operating systems, devices or browsers used, language settings, location, mouse movements, keystrokes, time spent on websites, previously visited websites, interactions with ReCaptcha on other websites, possibly cookies and results of manual recognition processes (e.g. answering questions asked or selecting objects in

images). The data processing is based on our legitimate interest to protect our online services from abusive automated crawling and spam; **Service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, , parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.google.com/recaptcha/>; **Privacy Policy:** <https://policies.google.com/privacy>; **Opt-Out:** Opt-Out-Plugin: <https://tools.google.com/dlpage/gaoptout?hl=en>, Settings for the Display of Advertisements: <https://adssettings.google.com/authenticated>.

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.

If we provide addresses and contact information of companies and organizations in this privacy policy, we ask you to note that addresses may change over time and to verify the information before contacting us.

Rights of Data Subjects

As data subject, you are entitled to various rights under the GDPR, which arise in particular from Articles 15 to 21 of the GDPR:

- **Right to Object:** You have the right, on grounds arising from your particular situation, to object at any time to the processing of your personal data which is based on letter (e) or (f) of Article 6(1) GDPR, including profiling based on those provisions. Where personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of the personal data concerning you for the purpose of such marketing, which includes profiling to the extent that it is related to such direct marketing.
- **Right of withdrawal for consents:** You have the right to revoke consents at any time.
- **Right of access:** You have the right to request confirmation as to whether the data in question will be processed and to be informed of this data and to receive further information and a copy of the data in accordance with the provisions of the law.

- **Right to rectification:** You have the right, in accordance with the law, to request the completion of the data concerning you or the rectification of the incorrect data concerning you.
- **Right to Erasure and Right to Restriction of Processing:** In accordance with the statutory provisions, you have the right to demand that the relevant data be erased immediately or, alternatively, to demand that the processing of the data be restricted in accordance with the statutory provisions.
- **Right to data portability:** You have the right to receive data concerning you which you have provided to us in a structured, common and machine-readable format in accordance with the legal requirements, or to request its transmission to another controller.
- **Complaint to the supervisory authority:** Without prejudice to any other administrative or judicial remedy, you shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the GDPR.

Supervisory authority competent for us:

Österreichische Datenschutzbehörde
Barichgasse 40-42,
1030 Vienna
Austria / Europe

Phone: +43 (1) 521 52-25 69

Email: dsb@dsb.gv.at