

# **Data privacy statement**

The data controller as defined in the General Data Protection Regulation and other national data protection laws of the Member States as well as other data protection regulations is:

CleanControlling GmbH Gehrenstraße 11A 78576 Emmingen-Liptingen Germany

Tel.: +49 (0)7465 929 6780 E-mail: <u>info@cleancontrolling.de</u> Website: <u>www.cleancontrolling.de</u>

## General information about data processing

### Description and scope of personal data processing

Our website can be visited without registration. Data such as the pages visited or the name of the retrieved file, date and time are stored on the server for statistical purposes, without directly relating this data to you.

Insofar as there is an option to enter personal data on our website (for instance, in our contact form), this data is entered on a voluntary basis. The required mandatory information is clearly marked and required for the respective service and its personalization.

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

When processing personal data necessary for the performance of a contract on which the data subject is a party, Art. 6, Para. 1 lit. b of the GDPR serves as the legal basis. This also applies to processing operations required to carry out precontractual measures.

Insofar as the processing of personal data is required to fulfill a legal obligation that applies to our company, Art. 6, Para. 1 lit. c of the GDPR serves as the legal basis.

#### Data deletion and storage duration

The personal data of the data subject will be deleted or blocked as soon as the purpose for storage expires. It may be stored for longer than this period if provided for by the European or national legislator in EU regulations, laws or other regulations to which the data controller is subject. Blocking or deletion of the data also takes place when a storage period prescribed by the aforementioned regulations expires, unless there is a need for further storage of the data for the conclusion or fulfillment of a contract.

## Website provision and log file creation

#### Description and scope of data processing

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

The following data is collected:

- (1) Name of retrieved file
- (2) Date and time of retrieval
- (3) Transferred data amount, message about successful retrieval
- (4) Web browser and requested domain



The IP addresses of requesting computers are also logged. Further personal data is only collected if the website user and/or customer voluntarily provides it, such as through an inquiry or registration or to conclude a contract or through their browser settings.

The data is also stored in our system's log files. This data is not stored together with other personal data pertaining to the user.

#### Purpose of data processing

The temporary storage of the IP address by the system is necessary to enable the website to be delivered to the user's computer. To do this, the user's IP address must be stored for the duration of the session.

Storage in log files is done to ensure the functionality of the website. The data is also used to optimize the website and ensure the security of our IT systems. The data is not evaluated for marketing purposes in this context.

The legal basis for the temporary storage of data and log files is Art. 6 Para. 1 lit. f of the GDPR.

## Duration of storage

The data will be deleted as soon as it is no longer necessary to achieve the purpose of its collection. In the case of data collection for the provision of the website, this happens when the respective session has ended or, in the case of data storage in log files, after a maximum of seven days. Longer storage periods are possible. In this case, the user's IP addresses will be deleted or encrypted to prevent them from being assigned to the respective user.

## Right of objection and deletion

The collection of data for website provision and the storage of data in log files is necessary for website operation. The user does not have any right of opposition.

## Use of cookies

# Description and scope of data processing

Our website uses cookies. Cookies are text files that are stored in the Internet browser or the Internet browser on the user's computer system. When a user accesses a website, a cookie may be stored on the user's operating system. This cookie contains a characteristic string that allows the browser to be uniquely identified when the website is reopened.

We use cookies to make our services more user-friendly. Some elements of our website require the accessing browsing to be identifiable even after changing website.

The following data is stored and transmitted in cookies:

- (1) Language settings
- (2) Items in a shopping trolley
- (3) Log-in information

#### Purpose of data processing

The purpose of using technically necessary cookies is to simplify website navigation for users. Some features of our website cannot be offered without the use of cookies. For this, it is necessary for the browser to be recognized even after the user changes website.

The user data collected via technically necessary cookies will not be used to create user profiles. The legal basis for the processing of personal data using cookies is Art. 6 Para. 1 lit. f of the GDPR.

#### Duration of storage, right to opposition and deletion

Cookies are stored on the user's computer and transmitted from there to our website. Therefore, as a user, you have full control over the use of cookies. By changing the settings in your Internet



browser, you can disable or restrict the transmission of cookies. Cookies that have already been stored can be deleted at any time. This can happen automatically. If cookies are deactivated for our website, it may not be possible to fully use all the functions of the website.

#### Contact

## Description and scope of data processing

A contact form is available on our website, which can be used for electronic contact. If the user uses this facility, the data entered in the input mask will be transmitted to us and saved. This data is:

- (1) Title
- (2) Name, surname
- (3) Telephone and fax numbers
- (4) E-mail address and website
- (5) Company and company address

When the message is sent, the following data is also stored:

- (1) The IP address of the user
- (2) Date and time of registration

In order to process the data, you consent is obtained as part of the sending process and reference is made to this privacy policy.

Alternatively, contact can also be made via e-mail or telephone. In this case, the user's personal data provided via e-mail or telephone will be stored.

There is no disclosure of data to third parties in this context. The data will be used solely to process the conversation and any business contacts that may result in order to fulfill a contract or perform pre-contractual measures.

#### Purpose of data processing

The processing of the personal data from the input mask is used only to process the contact. In the case of contact via e-mail, this also constitutes the required legitimate interest in the data processing.

Other personal data processed during the sending process serve to prevent misuse of the contact form and to ensure the security of our information technology systems.

The legal basis for the processing of data with the consent of the user is Art. 6 Para. 1 lit. a of the GDPR. The legal basis for the processing of data transmitted in the course of sending an e-mail is Art. 6 Para. 1 lit. f of the GDPR. If the e-mail contact aims to conclude a contract, the additional legal basis for processing Art. 6 Para. 1 lit. b of the GDPR is still valid.

#### Duration of storage

The data will be deleted as soon as it is no longer necessary to achieve the purpose of its collection. If other business transactions arise from the contact, (contract, pre-contractual measures), the data required for the execution of the contract will continue to be stored. The duration of storage then results from the contractual or legal requirements (e.g. legal retention period). Such contract data is therefore kept by us for ten years.

#### Right of objection and deletion

The user has the right to revoke their consent to the processing of their personal data at any time. Revocation should be e-mailed in writing to: <a href="mailto:service@cleancontrolling.de">service@cleancontrolling.de</a> If the user contacts us by e-mail, they may object to the storage of their personal data at any time. In such a case, the conversation cannot be continued. The same applies to contact made by telephone. In this case, all personal data stored in relation to the contact will be deleted.



## Online registration for events

## Description and scope of data processing

On our website, clients of CleanControlling GmbH have the opportunity to register for events offered by CleanControlling GmbH, such as specialist conferences and seminars.

When registering for the event, the following data is transmitted to us from the input mask (mandatory fields are clearly marked):

- (1) First name and last name
- (2) Function
- (3) Company
- (4) Street
- (5) Postal code, city, country
- (6) E-mail address
- (7) Phone number
- (8) Remarks

For the processing of data, your consent is obtained during the registration process and reference is made to this privacy policy. For the confirmation of the registration, you will receive an e-mail with a confirmation link for the binding confirmation of the registration.

No data will be passed on to third parties in connection with the data processing. The data will be used exclusively for registration of participation in the CleanControlling GmbH event and for order confirmation and invoicing.

## Purpose of data processing

The processing of personal data from the input mask serves us solely for the processing and invoicing of the registration for participation in the event. In the case of contact by e-mail, this also constitutes the necessary legitimate interest in processing the data.

The other personal data processed during the submission process serve to prevent misuse of the registration and to ensure the security of our information technology systems.

The legal basis for the processing of the data is Art. 6 para. 1 lit. a DSGVO if the user has given his consent. The legal basis for the processing of data transmitted while sending an e-mail is Art. 6 (1) lit. f DSGVO. If the e-mail contact aims at the conclusion of a contract, additional legal basis for the processing is Art. 6 para. 1 lit. b DSGVO still valid.

#### Duration of storage

If the registration results in further business processes (contract, pre-contractual measures), the data required for the execution of the contract will continue to be stored. The duration of storage then results from the contractual or legal requirements (e.g., legal retention period). Such contractual data is therefore regularly stored by us for ten years. The data is deleted as soon as it is no longer required to achieve the purpose for which it was collected.

## Possibility of objection and removal

The user has the possibility to revoke his consent to the processing of personal data at any time. The revocation must be made in writing by e-mail to the address: service@cleancontrolling.de. If the user contacts us by e-mail, he can object to the storage of his personal data at any time. In such a case, the conversation cannot be continued. The same applies to contact by telephone. All personal data stored during registration will be deleted in this case.



## CleanControlling Portal

## Description and scope of data processing

On our CleanControlling Portal, clients of CleanControlling GmbH have the opportunity to register for digital access to their analysis data, protocols, test specifications and evaluations. The access will be approved by CleanControlling after verification.

If the specific contact person (customer's employee) is stored in our customer account, the release for the CleanControlling portal is carried out by us. If we grant the release, a usage contract is concluded with the client. The release refers to the respective employee of the customer, specified by his individual company e-mail address, and by the company data and customer number of the customer. When registering for access to the CleanControlling Portal, the following data is transmitted to us from the input mask (mandatory fields are clearly marked):

- (1) individual company e-mail address
- (2) first name and last name
- (3) country/region
- (4) company name
- (5) company location
- (6) customer number
- (7) Telephone number

For the processing of the data, your consent is obtained during the registration process and reference is made to this data protection declaration.

No data will be passed on to third parties in connection with the data processing. The data will be used exclusively for providing access to the CleanControlling portal.

#### Purpose of data processing

The collection of e-mail address, company data and possibly other personal data during the registration process serves to prevent misuse of the services.

The legal basis for the processing of the data after registration to the CleanControlling Portal by the user is Art. 6 Para. 1 lit. a of the GDPR if the user has given his consent.

#### Duration of storage

The data will be deleted as soon as they are no longer required to achieve the purpose for which they were collected. Accordingly, the above-mentioned user data will be stored for as long as access to the CleanControlling Portal is active.

## Possibility of objection and removal

User registration is required for the provision of content and services on our CleanControlling Portal. After the user has finished using the access, the data will be deleted. The use of the portal is governed by the *General Terms of Use CleanControlling Portal*, which are accepted by the user upon registration.

#### Newsletter

#### Description and scope of data processing

Our website offers uses the opportunity to subscribe to a free newsletter. The data entered in the input mask for newsletter registration is transmitted to us.

The following data is collected during registration (obligatory fields are clearly marked):

- (1) Title
- (2) Name and surname
- (3) E-mail address
- (4) Company



In order to process the data, your consent is obtained as part of the registration process and reference is made to this privacy policy.

There is no disclosure of data to third parties within the context of data processing for sending the newsletter. The data is only used for the purpose of sending the newsletter.

## Purpose of data processing

The e-mail address of the user is stored in order to send them the newsletter. The collection of any other personal data as part of the registration process serves to prevent any misuse of the services or the e-mail address used.

The legal basis for the processing of data after newsletter registration by the user is, with the consent of the user, Art. 6 Para. 1 lit. a of the GDPR.

## Duration of storage

The data will be deleted as soon as it is no longer necessary to achieve the purpose of its collection. The aforementioned user data is only stored for as long as newsletter subscription is active.

## Right of objection and deletion

User registration is required for the provision of certain content and services on our website. For the purpose of unsubscribing from the newsletter, a link to a subscribe and unsubscribe form appears on the website to collect your data for subscribing and unsubscribing. Once you have subscribed, you will receive a confirmation e-mail with the details entered.

When unsubscribing, you will also receive an e-mail to confirm this.

During registration, the following data is also stored:

- (1) The IP address of the user
- (2) Date and time of registration
- (3) Browser and operating system

#### Usage evaluation using Google Analytics

# Description, scope and purpose of the data processing

We use Google Analytics, an analytics service provided by Google Inc. ("Google"), to evaluate the browsing behavior of our users. This tool uses cookies (see above), which forward the generated information to Google for further analysis. The IP addresses are truncated to ensure that no clear assignment to the accessing computer is possible.

On our behalf, Google uses the information generated to evaluate your use of our site, compile reports on the website activity for our site, and provide other services related to website activity and Internet usage. Google will also transfer this information to third parties if required by law or if third parties process this data on behalf of Google. You can prevent the storage of cookies by setting your browser accordingly (see next section). By using this site, you expressly agree to the processing of your data by Google in the aforementioned manner and for the purposes set out above. In order to fully comply with legal data protection requirements, we have entered into a processing contract with Google.

#### Right of objection and deletion

Data collection and storage by Google Analytics may be objected to at any time with future effect. You have the option to install a Google browser plugin. This is available for different browser versions and can be downloaded at http://tools.google.com/dlpage/gaoptout?hl=de



# Use of Google AdWords and conversion measurement

## Description, scope and purpose of the data processing

Our website uses Google AdWords, a service provided by Google LLC ("Google").

This application is an online advertising program designed to place ads on the Google advertising network (e.g. in search results, videos, on websites, etc.) in order to display them to users who are believed to have an interest in them. This enables ads to be more targeted and only show users ads that potentially match their interests.

For this purpose, an individual cookie is generated on the device of the user, which records which websites the user visited, what content they are interested in and what offers they clicked, in addition to technical information about the browser and operating system, referring web pages, visiting time and other information on the use of the online offer.

Furthermore, we receive an individual "conversion cookie". The information obtained through the cookie is used by Google to generate conversion statistics for us. However, we only receive information on the anonymous total number of users who clicked on our ad and were redirected to a page with a conversion tracking tag. However, we do not receive information that personally identifies users.

For details on Google AdWords and Google Conversion Tracking, see the Google Privacy Policy: https://www.google.de/policies/privacy/

## Duration of storage

Google AdWords cookies expire after 30 days and do not serve to identify the user personally. User data is stored and processed within the Google Advertising Network so that no conclusions can be made about natural persons. All data is pseudonymized and only displays the user profile of a cookie holder.

#### Right of objection and deletion

You can monitor, restrict or prevent the setting of cookies with a modern web browser. Deactivating cookies may result in the limited functionality of our website.

#### Use of social media, tools, links and third-party content

#### Description and scope of data processing

We currently use the following social media plug-ins and tools:

- (1) YouTube
- (2) Google Maps
- (3) Google ReCaptcha
- (4) Links to other websites

In principle, no personal data is passed on to the providers of the plug-ins or tools.

#### YouTube

Our website uses plugins from YouTube for the integration and presentation of video content. The provider of the video portal is YouTube, LLC, 901 Cherry Ave., San Bruno, CA 94066, USA. When you visit a page with integrated YouTube plugin, a connection is made to YouTube's servers. YouTube will therefore receive information on which websites you have accessed.

YouTube may associate your browsing behavior directly with your personal profile if you are logged into your YouTube account. You have the option to prevent this by logging out beforehand.

The use of YouTube is in the interest of an attractive presentation of our online offer. This constitutes a legitimate interest as defined in Art. 6, Para. 1 lit. f of the GDPR.



For details on how user data is handled, please see the YouTube privacy policy https://www.google.de/intl/de/policies/privacy

#### Google ReCaptcha

We integrate the function to detect bots, e.g. when entering information on online forms ("ReCaptcha"), provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Privacy policy: https://www.google.com/policies/privacy/, Opt-Out: https://adssettings.google.com/authenticated.

#### Google Maps

We integrate the maps from the Google Maps service provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. The processed data may include, in particular, users' IP addresses and location data, but these are not collected without their consent (usually as part of the settings of their mobile devices). The data can be processed in the USA. Privacy policy: https://www.google.com/policies/privacy/, Opt-Out: https://adssettings.google.com/authenticated.

## Purpose of data processing

We offer you the opportunity to communicate directly with the provider of the plug-in via these functions. Only through activation will the provider receive the information that you have accessed the corresponding website pertaining to our online service.

The legal basis for the use of plug-ins is Art. 6 Para. 1 p. 1 lit. f of the GDPR.

## Duration of storage, right to opposition and deletion

We have no control over the collected data and data processing operations, nor are we aware of the full scope of data collection, processing purposes, retention periods and deletions.

As data collection is usually done through cookies, it is recommended that you check your browser settings regularly (however, this may limit the use of websites and the services offered). You can delete saved cookies at any time.

# Administration, financial accounting, office organization, contact management Description, scope and purpose of the data processing

We process data in the context of administrative tasks and the organization of our business, financial accounting and compliance with legal obligations, such as archiving. In regards to this, we process the same data that we process as part of fulfilling our contractual services. The bases for processing are Art. 6 Para. 1 lit c. of the GDPR and Art. 6 Para. 1 lit f of the GDPR. The processing affects customers, interested parties, business partners and website visitors. The purpose and our interest in processing lies in administration, financial accounting, office organization and data archiving – in other words tasks that serve to maintain our business, perform our duties and provide our services. The information specified for these processing tasks also applies to the deletion of data with regard to contractual services and contractual communication.

In relation to this, we disclose or transmit data to the fiscal authorities, consultants such as tax accountants or auditors and other billing centers and payment service providers.

Based on our business interests, we also store information about suppliers, promoters and other business partners, e.g. for later contact. This data, the majority of which is company-related, is generally stored permanently.



# Rights of the data subject

You have the right to receive information about the personal data we hold about you at any time and free of charge. Furthermore, in cases indicated by law, you have the right to correct incorrect data, block or delete. You also have the right to object to the further use of your personal data at any time with future effect.

Please note that your right to delete data may be restricted by statutory retention requirements which we must observe.

For data protection concerns, please contact the data controller as specified above.

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