

Privacy Policy

The protection of personal data is important to us. We therefore conduct our activities in accordance with the applicable legal provisions on the protection of personal data and data security.

Please read the following privacy policy carefully, with which we intend both to inform you about our processing activities and to fulfil our legal obligations, in particular those arising from the EU General Data Protection Regulation ("GDPR"). If you have any questions about data protection that you cannot answer with the help of this privacy policy, please contact us at datenschutz@secusmart.com.

1.) **Ambit**

In the following, we provide information about the processing of personal data when you use our website or contact us by email or post. Personal data is all data that can be related to you personally, such as name, address, e-mail addresses, user behaviour.

When you access certain links on our website, you may be automatically redirected to the website www.blackberry.com of BlackBerry Deutschland GmbH or BlackBerry Limited. In these cases, the respective operator is the data controller under data protection law for your personal data processed on these pages. You can access the privacy policy of BlackBerry Limited and its affiliated companies at <https://www.blackberry.com/us/en/legal/privacy-notice>.

2.) **Controller, Contact**

The controller pursuant to Art. 4 (7) GDPR is

Secusmart GmbH
Heinrichstraße 155
40239 Düsseldorf
Email: info@secusmart.com
(see also our legal notice)

You can reach our data protection officer at datenschutz@secusmart.de or at our postal address with the addition "the data protection officer".

3.) **Processing of personal data when you contact us**

When you contact us by email or post, the data you provide (your email address or postal address, your name and, if applicable, your telephone number) will be stored by us in order to answer your questions (legal basis is Art. 6 (1) sentence 1 lit. f GDPR).

We delete the data arising in this context, if the enquiry is assigned to a contract, after the contract period, otherwise after the storage is no longer necessary, or restrict the processing if there are legal storage obligations.

If we use contracted service providers for individual functions of our offer or wish to use your data for advertising purposes, we will always carefully select and monitor these service providers and inform you in detail below about the respective processes. We will also state the specified criteria for the storage period.

4.) Processing of personal data when visiting our website

When using the website for information purposes, i.e. simply viewing it without registering and without providing us with any other information, we process the personal data that your browser transmits to our server. The data described below is technically necessary for us to display our website to you and to ensure stability and security and must therefore be processed by us. The legal basis is Art. 6 (1) sentence 1 lit. f GDPR.

- IP address
- Date and time of the enquiry
- Time zone difference to Greenwich Mean Time (GMT)
- Content of the request (page visited)
- Access status/HTTP status code
- amount of data transferred in each case
- previously visited page
- browser
- operating system
- Language and version of the browser software.

5.) Use of cookies

(1) In addition to the aforementioned data, we use technical aids for various functions when you use our website, in particular cookies, which can be stored on your end device. When you access our website and at any time thereafter, you have the choice of whether you generally allow cookies to be set or which individual additional functions you would like to select. You can make changes in your browser settings or via our Consent Manager. In the following, we first describe cookies from a technical perspective (2) before going into more detail about your individual choices by describing technically necessary cookies (3) and cookies that you can voluntarily select or deselect (4).

(2) Cookies are text files or information in a database that are stored on your hard drive and assigned to the browser you are using so that certain information can flow to the organization that sets the cookie. Cookies cannot execute programs or transfer viruses to your computer, but are primarily used to make the website more user-friendly and faster overall. This website uses the following types of cookies, whose function and legal basis are explained below:

- a) Transient cookies: Such cookies, especially session cookies, are automatically deleted when the browser is closed or by logging out. They contain a so-called

session ID. This allows various requests from your browser to be assigned to the shared session and your computer can be recognized when you return to our website.

- b) Persistent cookies: These are automatically deleted after a specified period, which varies depending on the cookie. You can view the cookies set and the duration at any time in your browser settings and delete the cookies manually.

(3) **Mandatory** functions that are technically necessary to display the website: The technical structure of the website requires us to use technologies, in particular cookies. Without these technologies, our website cannot be displayed (completely correctly) or the support functions cannot be enabled. These are generally transient cookies that are deleted at the end of your website visit, at the latest when you close your browser. You cannot deselect these cookies if you wish to use our website. The individual cookies can be seen in the Consent Manager. The legal basis for this processing is Art. 6 (1) sentence 1 lit. f GDPR.

(4) **Optional** cookies if you give your consent: There are various cookies that we only set with your consent, which you can select when you first visit our website using the so-called Consent Manager Tool. The functions are only activated if you give your consent and can be used in particular to enable us to analyze and improve visits to our website, to make it easier for you to use our website via different browsers or end devices, to recognize you when you visit us again or to place advertising (possibly also to tailor advertising to your interests, measure the effectiveness of advertisements or show interest-based advertising). The legal basis for this processing is Art. 6 (1) sentence 1 lit. a GDPR. You can withdraw your consent at any time without this affecting the lawfulness of processing up to the point of withdrawal. The functions we use, which you can select and revoke individually via the Consent Manager, are described below.

6.) Other functions and offers on our website

In addition to the purely informational use of our website, we offer various services that you can use if you are interested and use other common functions to analyze or market our offers, which are presented in more detail below. For this purpose, you must generally provide additional personal data and we process such additional data that we use to provide the respective service. The aforementioned data processing principles apply to all data processing purposes described here.

In some cases, we use external service providers to process your data. These have been carefully selected and commissioned by us, are bound by our instructions and are regularly monitored.

Furthermore, we may pass on your personal data to third parties if we offer participation in promotions, competitions, contracts or similar services together with partners. Depending on the service, your data may also be collected by the partners on their own account. You will receive

more detailed information on this at the time you provide your personal data or in the description of the respective offers below.

If our service providers or partners are based in a country outside the European Economic Area (EEA), we will inform you of the consequences of this circumstance in the description of the offer.

7.) Our presence on social networks

We have various presences on social media platforms. We operate these sites through the following providers:

- a.) **X**, Inc., 1355 Market St, Suite 900, San Francisco, California 94103, USA; <https://twitter.com/privacy>.
- b.) **Facebook** Inc., 1601 S California Ave, Palo Alto, California 94304, USA; www.facebook.com/policy.php; further information on data collection: www.facebook.com/help/186325668085084, www.facebook.com/about/privacy/your-info-on-other as well as www.facebook.com/about/privacy/your-info.
- c.) **LinkedIn** Corporation, 2029 Stierlin Court, Mountain View, California 94043, USA; www.linkedin.com/legal/privacy-policy.
- d.) **Instagram** Inc., 1601 Willow Road, Menlo Park, CA, 94025, USA; <https://help.instagram.com/519522125107875>.
- e.) **Youtube**, Diensteanbieterin: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4 Ireland, https://www.youtube.com/intl/ALL_en/howyoutubeworks/user-settings/privacy/ and <https://policies.google.com/privacy?hl=en>.

We use the technical platform and services of the providers for these information services. We would like to point out that you use our presence on social media platforms and their functions on your own responsibility. This applies in particular to the use of interactive functions (e.g. commenting, sharing, rating). When you visit our social media pages, the providers of the social media platforms collect your IP address and other information that is stored on your device in the form of cookies. This information is used to provide us, as the operator of the accounts, with statistical information about the interaction with us.

The data collected about you in this context is processed by the platforms and may be transferred to countries outside the European Union, in particular the USA. According to their own information, all of the aforementioned providers maintain an appropriate level of data protection, comply with the EU-US data privacy framework, and/or we have concluded the standard data protection clauses with the companies. We do not know how the social media platforms use the data from your visit to our account and interaction with our posts for their own purposes, how long this data is stored and whether data is passed on to third parties. Data processing may differ depending on whether you are registered and logged in to the social network or whether you visit the site as a non-registered and/or non-logged-in user. When you access a post or the account, the IP address assigned to your end device is transmitted to the provider of the social media platform. If you are currently logged in as a user, a cookie on your device can be used to track how

you have moved around the web. Buttons integrated into websites enable the platforms to record your visits to these pages and assign them to your respective profile. This data can be used to offer you customized content or advertising. If you want to avoid this, you should log out or deactivate the "stay logged in" function, delete the cookies on your device and restart your browser.

Furthermore, as the provider of the information service, we only process the data from your use of our service that you provide to us and that requires interaction. For example, if you ask a question that we can only answer by email, we will store your information in accordance with the general principles of our data processing, which we describe in this privacy policy. The legal basis for the processing of your data on the social media platform is Art. 6 (1) sentence 1 lit. f GDPR.

To exercise your rights as a data subject, you can contact us or the provider of the social media platform. If one party is not responsible for responding or must receive the information from the other party, we or the provider will then forward your enquiry to the respective partner. Please contact the operator of the social media platform directly for questions about profiling and the processing of your data when using the website. If you have any questions about the processing of your interaction with us on our site, please write to the contact details provided by us above.

What information the social media platform receives and how it is used is described by the providers in their privacy policies (see link in the table above). There you will also find information about contact options and the settings options for adverts.

8.) Integration of YouTube videos

We occasionally include YouTube videos in our online offering, which may be stored on <http://www.YouTube.com> and can be played directly from our website. These are all integrated in "extended data protection mode", i.e. no data about you as a user is transferred to YouTube if you do not play the videos. Only when you play the videos will the data mentioned in the following paragraph be transmitted. We have no influence on this data transfer.

When you visit the website, YouTube receives the information that you have accessed the corresponding subpage of our website. In addition, the data mentioned under 4.) of this privacy policy will be transmitted. This occurs regardless of whether YouTube provides a user account through which you are logged in or whether no user account exists. If you are logged into your Google account, your data will be assigned directly to your account. If you do not wish your data to be associated with your YouTube profile, you must log out before activating the button. YouTube stores your data as usage profiles and uses them for the purposes of advertising, market research and/or customizing its website. Such an analysis is carried out in particular (even for users who are not logged in) to provide customized advertising and to inform other users of the social network about your activities on our website. You have the right to object to the creation of these user profiles, although you must contact YouTube to exercise this right.

The information collected is stored on Google servers, including in the USA. In these cases, the provider, according to its own information, complies with the EU-US data privacy framework and has promised to comply with applicable data protection laws when transferring data internationally. We have also agreed so-called standard data protection clauses.

Further information on the purpose and scope of data collection and its processing by YouTube can be found in Google's privacy policy. There you will also find further information on your rights and setting options to protect your privacy: www.google.de/intl/en/policies/privacy.

9.) Use of our webshop

If you wish to place an order in our web shop, it is necessary for the conclusion of the contract that you provide your personal data, which we require for the processing of your order. Mandatory information required for the processing of contracts is marked separately, other information is voluntary. We process the data you provide to fulfil your order. For this purpose, we may pass on your payment details to our bank. The legal basis for this is Art. 6 (1) sentence 1 lit. b GDPR.

We may also process the data you provide in order to inform you about other interesting products from our portfolio or to send you emails with technical information.

Due to commercial and tax law requirements, we are obliged to store your address, payment and order data for a period of ten years.

10.) Integration Google Maps

We occasionally use Google Maps on this website. This enables us to show you interactive maps directly on the website and allows you to use the map function conveniently.

When you visit the website, Google receives the information that you have accessed the corresponding subpage of our website. In addition, the data mentioned under 3.) in this privacy policy will be transmitted. This occurs regardless of whether Google provides a user account through which you are logged in or whether no user account exists. If you are logged into your Google account, your data will be assigned directly to your account. If you do not wish your data to be associated with your Google profile, you must log out before activating the button. Google stores your data as usage profiles and uses them for the purposes of advertising, market research and/or customizing its website. Such an analysis is carried out in particular (even for users who are not logged in) to provide customized advertising and to inform other users of the social network about your activities on our website. You have the right to object to the creation of these user profiles, although you must contact Google to exercise this right.

The information collected is stored on Google servers, including in the USA. In these cases, the provider, according to its own information, complies with the EU-US data privacy framework and has promised to comply with applicable data protection laws when transferring data internationally. We have also agreed so-called standard data protection clauses.

Further information on the purpose and scope of data collection and its processing by the plug-in provider can be found in the provider's privacy policy. There you will also find further information on your rights in this regard and setting options to protect your privacy: www.google.de/intl/en/policies/privacy.

11.) Use of Google Web Fonts

On our website, we use external fonts, so-called Google Fonts, which are provided by Google, for the purpose of uniform display of fonts on your device. Google Fonts is a service provided by Google Inc ("Google"), 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. When you access a page, your browser loads the required web fonts into your browser cache in order to display texts and fonts correctly. If your browser does not support web fonts, a standard font will be used by your computer.

The web fonts are integrated via an interface ("API") to the Google services. By integrating the web fonts, Google may collect information (including personal data) and process it in the USA.

We ourselves do not collect any data as part of the use of Google Fonts.

The legal basis for the processing of personal data described here is Article 6 (1) sentence 1 lit. (f) GDPR. Our legitimate interest required for this lies in the great benefit that a standardized presentation of the fonts offers. The possibility of a standardized presentation means that we keep the design effort lower than if we had to react to font standards of different operating systems or browsers with our own graphically adapted websites. Google also has a legitimate interest in the (personal) data collected in order to improve its own services.

The provision of your personal data is not required by law or contract and is not necessary for the conclusion of a contract. You are also not obliged to provide the personal data. However, if you do not provide it, you may not be able to use our website or not be able to use it to its full extent and the presentation of the website may change.

You can set your browser in such a way that the fonts are not loaded from the Google servers. If your browser does not support Google Fonts or you prevent access to the Google servers, the text will be displayed in the system's default font.

You can find more information at:

- www.google.com/fonts#AboutPlace:about
- <https://developers.google.com/terms/>
- <https://policies.google.com/privacy?hl=en>

12.) Your rights

You have the following rights against us in relation to the personal data concerning you:

- **Right to withdraw your consent and right to object**
If you have given us your consent to certain processing activities, you can withdraw this consent at any time with effect for the future. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. The easiest way to withdraw consent is via our Consent Manager or by sending a message to datenschutz@secusmart.de.

Insofar as we base the processing of your personal data on the assessment of interests, you can object to the processing. This is the case if, in particular, the processing is not

necessary for the fulfilment of a contract with you, which is described by us in the following description of the functions. When exercising such an objection, we ask you to explain the reasons why we should not process your personal data as we have done. In the event of your justified objection, we will examine the situation and will either discontinue or adapt the data processing or show you our imperative reasons warranting protection, on the basis of which we will continue the processing.

You can, of course, object to the processing of your personal data for advertising and data analysis purposes at any time. You can inform us of your objection to advertising using the following contact details:

By post: Secusmart GmbH, Heinrichstraße 155, 40239 Düsseldorf

By email: info@secusmart.com.

- **Right of access (Art. 15 GDPR):**
- Any data subject whose personal data is processed by us has the right to access their personal data by requesting information about the personal data we hold about them.
- **Right to rectification and erasure (Art. 16, 17 GDPR):**
Any data subject may request the rectification of inaccurate or incomplete personal data held by us. As a data subject, you can request the erasure of your personal data if this data is no longer required for the purposes of processing. It is possible that a request for erasure cannot be granted, for example if the retention of personal data is necessary to fulfil a legal requirement.
- **Right to restriction of processing (Art. 18 GDPR):**
Any data subject may request that the processing of their personal data be restricted or discontinued for a certain period of time or - under certain circumstances - for an indefinite period of time.
- **Right to object (Art. 21 GDPR):**
Any data subject may object to the further processing of their personal data that is in the legitimate interest of Secusmart or a third party.
- **Right to data portability (Art. 20 GDPR):**
On the basis of the right to data portability, a data subject may request to receive the personal data stored by Secusmart in a commonly used, machine-readable format, e.g. in CSV or Excel format.

In accordance with Art. 77 GDPR, you also have the right to complain to a data protection supervisory authority about the processing of your personal data by us.

The competent data protection authority for Secusmart GmbH is:

**Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen (Regional
Representative for Data Protection and Freedom of Information North Rhine-Westphalia)**
Kavalleriestraße 2-4
40213 Düsseldorf

If you have any further questions about data protection or wish to report a breach of data protection regulations, please contact datenschutz@secusmart.de.

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