

# Privacy policy

Thank you for visiting the Atlas Copco website and for your interest in our company!

## **Privacy policy (information on data protection regarding our data processing in accordance with Articles 13, 14 and 21 of the General Data Protection Regulation)**

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### **Atlas Copco Tools Central Europe GmbH**

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Central Europe GmbH B - 3740 Bilzen  
Langemarckstraße 35  
D - 45141 Essen

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Thank you for visiting our website or our social media pages and for your interest in our company. The protection of your personal data is important to us. In compliance with Articles 13, 14 and 21 of the General Data Protection Regulation (GDPR), we provide the following information regarding the processing of your personal data when you use our websites <https://www.atlascopco.com/nl-be/itba>, <https://www.atlascopco.com/nl-be/itba/products> (hereinafter: “Website”) and our social media presence (hereinafter: “Presence”).

Personal data is individual information about the personal or factual circumstances of an identified or identifiable natural person. This includes information such as name, address, telephone number and date of birth.

## **1. Data controller**

### **A. Atlas Copco Tools Central Europe GmbH**

– Industrial tightening technology and assembly and software solutions, material processing tools, engineering and comprehensive (after-sales) services –

Langemarckstraße 35

45141 Essen

Phone: +49 201 2177 0

E-Mail: [communications.tools@atlascopco.com](mailto:communications.tools@atlascopco.com)

### **B. Atlas Copco IAS GmbH**

– Product lines SCA, Henrob, K-Flow and Quiss –

Gewerbestr. 52

75015 Bretten

Germany

Also applies to the premises at Oststraße 72, 32051 Herford and Wöhlerweg 9,

82538 Geretsried

Phone: +49 (0) 7252 5560 0

E-mail: [ias.de@atlascopco.com](mailto:ias.de@atlascopco.com)

## **2. Data protection officer**

Silvia C. Bauer

– Data Protection Officer –

c/o Atlas Copco Tools Central Europe GmbH

Langemarckstr. 35  
45141 Essen  
Germany  
Phone: +49 (0) 201 2177 0  
E-mail: [datenschutz@luther-lawfirm.com](mailto:datenschutz@luther-lawfirm.com)

### **3. Purposes and legal bases of data processing when using the website**

#### **3.1. Using the website for information purposes**

You can visit our website without providing any personal information. If you only use our website for information purposes, i.e. if you do not register, place an order or otherwise provide us with information about yourself, we do not process any personal data, with the exception of the data that your browser transmits to enable you to visit the website and information that is transmitted to us as part of the cookies used.

##### **3.1.1. Technical provision of the website**

For the purpose of the technical provision of the website, our system (i.e. the web server) automatically collects information from your browser each time you access the website.

The temporary storage of your IP address by our system is required to enable delivery of the website to your computer. For this purpose, it is necessary to store the user's IP address for the duration of the session.

The IP address is stored in the log files in order to ensure the functionality of our website. In addition, we use this data to optimize the website and to ensure the security of our information technology systems (e.g. detection of a cyberattack). In addition, the data is analyzed for marketing purposes in connection with the tool described under 3.1.2. Analysis and tracking.

The following information is collected:

- IP address;
- Browser type/version (e.g: Firefox 59.0.2 (64-bit));
- Browser language (e.g: German);
- Operating system used (e.g: Windows 10);
- Inner resolution of the browser window;
- Screen resolution;

- JavaScript activation;
- Java On / Off;
- Cookies On / Off;
- Color depth;
- Time of access
- The previous website from which you reached us.

We also use cookies to enable you to access our website. Cookies are text files that are stored in the Internet browser or by the Internet browser on your computer system when you access a website. A cookie contains a characteristic string of characters that enables the browser to be uniquely identified when the website is called up again. Among other things, we use these cookies to provide you with access to our website and its technical functions. Some website functions cannot be accessed without the use of cookies. The following information is stored in the cookies and transmitted to us:

- The language you have selected on our website,
- an identification code of the service providers we use so that you can be recognized when you visit our website again.

Further information on the handling of cookies can be found in the help pages of the browser used and, for example, on the website <https://allaboutcookies.org/>.

To ensure that your visit to our website is as pleasant as possible, we use Adobe Experience Manager from Adobe Systems Software Ireland Limited (4-6 Riverwalk Citywest Business Campus, Dublin 24, Republic of Ireland) to deliver our content. The Adobe Experience Manager enables us to deliver our website content to you efficiently and as quickly as possible.

We process your personal data for the technical provision of our website based on the following legal grounds:

- to fulfill a contract or to carry out pre-contractual measures in accordance with Article 6 1(b) GDPR, insofar as you visit our website to find out about our company and our products/services; and
- to safeguard our legitimate interests in accordance with Article 6(1)(f) GDPR in order to make the website technically available to you. Our legitimate interest is to be able to provide you with an attractive, technically

functioning and user-friendly website and to take measures to protect our website from cyber risks and to prevent our website from posing cyber risks to third parties.

### **3.1.2. Analysis and tracking**

For the purpose of analyzing and tracking the use of our website, we or the service providers working on our behalf use cookies that permit analysis of your browsing behavior. This enables us to improve the quality of our website and its content. We learn how the website is used, enabling us to continually optimize our services. Web analysis is the collection, compilation and evaluation of data regarding the behavior of website visitors. A web analysis service collects data such as the website from which a user arrived (referred to as a referrer), which subpages were accessed, and how often or for how long a subpage was viewed. Web analysis is regularly used to optimize a website and for the cost-benefit analysis of Internet advertising. The information obtained in the course of analyzing and tracking our website may be merged with other personal data collected in the course of using the website. If you register on the website in order to order a newsletter or request documents, for example, we can link data relating to your website activities with your personal details (including name/email address) on the basis of your consent, e.g. using Marketo and Salesforce software, and so collect personal data to provide you with personalized and targeted information on your preferred topics, among other things.

We process your personal on the following legal basis:

- Your consent in accordance with Article 6(1)(a) GDPR;
- Your consent in accordance with Section 25(1) TDDDG with regard to the initial storage and reading out of data and;
- to safeguard our legitimate interests in accordance with Article 6(1)(f) GDPR, our legitimate interest is to analyze the traffic on our website in order to be able to constantly adapt our quality and our marketing and the economic interest in order to provide you with targeted offers and information corresponding to your interests.

#### **3.1.2.1. Google Analytics 4 (GA4)**

On our website, we use Google Analytics 4, a web analytics service provided by of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland (“Google”). Google Analytics uses cookies to analyze how you use the website. The

information collected by the cookie about the use of our website is usually transmitted to a Google server in the USA and stored there. However, if IP anonymization is activated on our website, your IP address will be truncated by Google within member states of the European Union (“EU”) or other parties to the Agreement on the European Economic Area (“EEA”) before transmission. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and truncated there.

Google will use this information on our behalf for the purpose of evaluating your use of the website, compiling reports on website activity and providing us with other services relating to website activity and Internet usage. The IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data.

We have also activated Google Signals in Google Analytics. If you have activated personalized advertising in your Google account (<https://adssettings.google.com/authenticated>) and are logged in to your Google account, our Google Analytics statistics (advertising reports, information for remarketing, cross-device reports) will therefore be expanded to include demographic characteristics and interests that Google collects and transmits to us anonymously. Google Signals can also be used to carry out remarketing to logged-in Google users.

Google carries out cross-device tracking so that your data is analyzed across devices (e.g. when using your smartphone or laptop) and also uses the data for cross-device marketing. The data collected by Google is linked by Google to your Google account. This may include information about your interests and demographic characteristics, such as age, language, gender, place of residence, occupation, marital status or income, which Google collects directly or via partners. Google Signals is only used with activated IP anonymization.

#### Withdrawal of consent

We only use Google Analytics with your consent. You can withdraw your consent once you have given it by

- preventing the storage of cookies by setting your browser software accordingly; however, we would like to point out that in this case you may not be able to use all functions of our website to their full extent;

- download and install the browser plugin available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=en> to prevent Google Analytics from collecting data on our website in the future. An opt-out cookie is stored in your browser. Please note that you must activate the opt-out cookie in every browser you use on all your end devices and, if necessary, reactivate it if you delete all cookies in a browser.

You can find more information on the terms of use and data protection of Google Analytics at <https://marketingplatform.google.com/about/analytics/terms/us/> or <https://policies.google.com/?hl=en&gl=us>.

### **3.1.2.2. Google Ads remarketing**

We use Google Ads remarketing from Google to advertise this website in Google search results and on third-party websites. For this purpose, the remarketing cookie is set by Google when you visit our website or the Google Analytics cookie is also used. In this case, both cookies automatically enable Interest-based advertising by means of a pseudonymous cookie ID and on the basis of the pages you visit.

The use of these tools serves to safeguard our legitimate interests, which predominate in the context of a balancing of interests, in the optimal marketing of our website in accordance with Article 6(1)(1)(f) GDPR. Once we no longer need Google services and have finished using them, the data collected in this context will be deleted.

Any further data processing will only take place if you have consented to Google linking your web and app browsing history to your Google account and using information from your Google account to personalize ads you see on the web. In this case, if you are logged in to Google while visiting our website, Google will use your data together with Google Analytics data to create and define target group lists for cross-device remarketing. For this purpose, your personal data is temporarily linked by Google with Google Analytics data in order to create target groups.

#### *Withdrawal of consent*

We only use Google Ads remarketing with your consent. You can withdraw your consent once you have given it by:

- preventing the storage of cookies by setting your browser software accordingly; however, we would like to point out that in this case you may not be able to use all functions of our website to their full extent;
- deactivate the remarketing cookie  
here [https://adssettings.google.com/anonymous?sig=ACi0TCgii2wklRCNHUQ4C\\_aW4yJgcu6sul8HGvp2SWcPktG3umS9aUyUB8koBhRzkzOqyaTC8gVbzeMWB\\_ZSyQwSqsWxtstg&hl=en](https://adssettings.google.com/anonymous?sig=ACi0TCgii2wklRCNHUQ4C_aW4yJgcu6sul8HGvp2SWcPktG3umS9aUyUB8koBhRzkzOqyaTC8gVbzeMWB_ZSyQwSqsWxtstg&hl=en).

You can find more information on the terms of use and data protection of Google Ads remarketing at <https://policies.google.com/?hl=en&gl=us>.

### **3.1.2.3. Google Tag Manager**

On our website we use the Google Tag Manager of Google Inc. Google Tag Manager is a solution that allows marketers to manage website tags via a single interface. The *Google Tag Manager* service itself (which implements the tags) is a cookie-less domain and does not collect any personal data. The *Google Tag Manager* service triggers other tags, which in turn may collect data. Google Tag Manager does not access this data. If deactivation has been made at domain or cookie level, this remains in effect for all tracking tags that are implemented with Google Tag Manager.

### **3.1.2.4. IPinfo**

In order to provide you with location-based or country-specific content, we use the ipinfo.io service to determine your two-digit country code. To do this, we access the ipinfo.io service directly from your browser using JavaScript. The service uses your IP address and returns a range of information, such as the aforementioned country code or your Internet provider. However, we do not know your IP address and only store the two-digit country code locally in a cookie (e.g. DE for Germany).

### **3.1.2.5. Marketo**

On our website, we use Marketo, a web analysis service from Adobe (Adobe Systems Software Ireland Limited, 4-6 Riverwalk, Citywest Business Campus, Dublin 24, Ireland) for our marketing activities. Marketo uses cookies to analyze your use of our website. The information collected by the cookie about your use of our website is usually transmitted to a Marketo server and stored there. If individual pages of our website are accessed, the following data is stored:



- three bytes of the IP address of the user's accessed system (anonymized IP address);
- the website accessed;
- the website from which you accessed the page on our website (referrer);
- the subpages that are accessed from the page accessed;
- the time spent on the website;
- the frequency with which the website is accessed.

Marketo processes this information on our behalf for the purpose of evaluating your use of the website, compiling reports on website activity and providing us with other services relating to website activity, marketing and Internet usage. If you register on the website, your website activities may be linked to the data you provided during registration in order to provide you with targeted information, for example. We use Marketo in particular in conjunction with our CRM system Salesforce. Marketo can send queries to Salesforce via an API connector to check whether the data you have transmitted (e.g. email addresses) is already stored as a contact (lead) in the Salesforce CRM system. This allows us to avoid duplicate data storage and match new data with existing records. Marketo can also access the forms provided by Adobe Experience Management in order to forward them to Salesforce.

The IP address transmitted by your browser within the framework of Marketo is not merged with other Marketo data.

#### Withdrawal of consent

We only use Marketo with your consent. You can withdraw your consent once you have given it by

- prevent the storage of cookies by setting your browser software accordingly (<https://docs.marketo.com/display/public/DOCS/Understanding+Privacy+Settings>); however, we would like to point out that in this case you may not be able to use all functions of our website to their full extent;

You can find more information on terms of use and data protection from or at Marketo at <https://www.adobe.com/legal.html>.

#### **3.1.2.6. Hotjar**

We use [Hotjar](https://www.hotjar.com/) analysis software from Hotjar Ltd. (“Hotjar”) (<https://www.hotjar.com/>, Hotjar Ltd, Level 2, St Julians Business Centre, 3, Elia Zammit Street, St Julians STJ 1000, Malta, Europe) to better understand your needs and to optimize the offer on this website by recording and analyzing your usage behavior and through your user feedback. Hotjar works with cookies and other technologies and stores this information in a pseudonymized user profile. The information is not used by Hotjar or by us to identify individual users, nor is it combined with other data about individual users.

The following information may be recorded by your device and browser:

- The IP address of your device (collected and stored in an anonymized format)
- Screen size of your device (Unique Device Identifiers)
- Device type and browser information
- Geographical position (country only)
- Log data

The following data is automatically generated by our servers when Hotjar is used

- Referring domain
- Visited pages
- Geographical position (country only)
- The preferred language to display our website
- Date and time at which the website was accessed.

### Withdrawal of consent

We only use Hotjar with your consent. You can withdraw your consent once you have given it by:

- preventing the storage of cookies by setting your browser software accordingly; however, we would like to point out that in this case you may not be able to use all functions of our website to their full extent;
- prevent the collection of data by Hotjar by clicking on the following link and following the instructions there: <https://www.hotjar.com/policies/do-not-track/>
- Hotjar also uses services from third-party companies, such as Google Analytics and Optimizely, to provide its services. These third-party

companies may store information that your browser sends when you visit the website, such as cookies or IP requests. For more information on how Google Analytics and Optimizely store and use data, please refer to their respective privacy policies.

Further information and Hotjar's privacy policy can be found at <https://www.hotjar.com/legal/policies/privacy>.

### **3.1.2.7. Drift live chat**

On our website we use Drift, a live chat software from Drift, Inc, 3 Copley Place, Suite 7000, Boston, MA 02116, USA (hereinafter "Drift"). Among other things, Drift uses cookies, text files that are stored on your computer and that enable a conversation in the form of a real-time chat on the website between you and our customer service or a chatbot (i.e. a technical system) (see also [section 3.2.1.](#)). The information generated by the cookie about the use of this website, including your IP address, is transmitted to Drift and stored there. The text messages in the live chat, and therefore any personal data you enter yourself, are also transmitted to Drift and stored on Drift's servers in the USA. Drift is certified under the EU-U.S. Data Privacy Framework (EU-U.S. DPF), so that the legal requirements for the adequacy of the level of data protection pursuant to Article 45 GDPR are met. If you do not want data to be processed and stored by Drift, you must not use the tool. If you have any questions, you are welcome to contact us by other means, e.g. via one of the contact forms provided.

#### *Withdrawal of consent*

We only use Drift with your consent. You can withdraw your consent once you have given it by

- preventing the storage of cookies by setting your browser software accordingly; however, we would like to point out that in this case you may not be able to use all functions of our website to their full extent;

For more information about how Drift works, please refer to the Drift Inc. privacy policy, available at: <https://www.drift.com/privacy-policy/>.

### **3.1.2.8. SalesViewer**

This website uses SalesViewer® technology from SalesViewer® GmbH to collect and store data for marketing, market research and optimization purposes on the basis of the website operator's legitimate interests (Article 6(1)(f) GDPR).

For this purpose, a JavaScript-based code is used to collect and use company-related data. The data collected using this technology is encrypted using a non-reversible one-way function (known as hashing). The data is immediately pseudonymized and is not used to personally identify the visitor to this website.

The data stored within the framework of SalesViewer will be deleted as soon as it is no longer required for its intended purpose, and the deletion does not conflict with any statutory retention obligations.

You can object to the collection and storage of data at any time with effect for the future by clicking on this link <https://www.salesviewer.com/opt-out> to prevent the collection of data by SalesViewer® within this website in the future. An opt-out cookie for this website is stored on your device. If you delete your cookies in this browser, you must click on this link again.

### **3.1.2.9. Microsoft Advertising**

On our website, we use conversion tracking from Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA. When you visit our website, Microsoft places a cookie on your computer, provided that you have given your consent for Microsoft cookies, which you can set in your individual browser settings. With Microsoft Advertising, for example, we can record and evaluate which advertisements brought you to our website and whether you reached a previously defined target page (conversion page). We only find out the total number of users who clicked on an ad and were then redirected to the conversion page. No personal information about the identity of the user is disclosed.

If you do not want information about your behavior to be used by Microsoft as explained above, you can refuse the setting of a cookie required for this – for example, by setting your browser to generally deactivate the automatic setting of cookies. You can also prevent the collection of data generated by the cookie and related to your use of the website and the processing of this data by Microsoft. You can state your objection to this by clicking the following link: <http://choice.microsoft.com/en-us/opt-out>.

Additional information on data protection and the cookies used by Microsoft Advertising can be found on the Microsoft website at <https://www.microsoft.com/en-us/privacy/privacystatement>.

### **3.1.2.10. SalesForce**

When you use our website, for example by filling out a contact form or registering for the newsletter, etc., we record the content you enter (e.g. your contact details, such as company name, etc.) in our CRM system using SalesForce (Sales-Force Germany GmbH, Erika-Mann-Str. 31, 80636 Munich (hereinafter “SalesForce”). When you sign up for the newsletter or submit a contact form, we can assign your previous interactions on our website to your person or your company by Marketo comparing whether previous data records relating to you or your company has already been stored in SalesForce. The processing of your data at SalesForce is based on our legitimate interest in using a CRM system in accordance with Article 6(1)(f) GDPR, and otherwise on your consent in accordance with Article 6(1)(a) GDPR.

You can find more information on data protection at SalesForce at <https://www.salesforce.com/company/legal/privacy/>.

### **3.1.2.11. YouTube**

We integrate videos from the YouTube service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland (“Google”). To make the videos accessible, Google processes the necessary technical data for this purpose. Google is responsible for this processing. You can find further information on how Google handles your personal data at <https://policies.google.com/privacy?hl=en>.

The integration of YouTube is essential for tailoring our website to meet user needs. This is also our legitimate interest in data processing in accordance with Article 6(1)(f) GDPR. Consent can be withdrawn at any time. If corresponding consent has been requested, the processing is carried out exclusively on the basis of Article 6(1)(a) GDPR and Section 25(1) TDDDG, insofar as the consent includes the storage of cookies or access to information on the user’s end device (e.g. device fingerprinting) within the meaning of the TDDDG.

The company is certified in accordance with the EU-US Data Privacy Framework (DPF).

### **3.1.2.12. Google Maps**

We integrate maps from the Google Maps service provided by Google LLC, 1600 Amphitheater Parkway, Mountain View, CA 94043, USA. To make the map material accessible, Google processes the necessary technical data for this purpose. Google LLC. is responsible for this processing. You can find further information on how Google handles your personal data at <https://policies.google.com/?hl=en&gl=us>. The integration of Google Maps is essential for tailoring our website to meet user needs. This is also our legitimate interest in data processing in accordance with Article 6(1)(f) GDPR. If corresponding consent has been requested, the processing is carried out exclusively on the basis of Article 6(1)(a) GDPR and Section 25(1) TDDDG, insofar as the consent includes the storage of cookies or access to information on the user's end device (e.g. device fingerprinting) within the meaning of the TDDDG. Consent can be withdrawn at any time.

The company is certified in accordance with the EU-US Data Privacy Framework (DPF).

### **3.1.3. Social media links**

A link to the Facebook, Twitter, LinkedIn, YouTube and Instagram services is integrated into the website. After clicking on the link, for example, you will be redirected to our Facebook or Instagram page, i.e. only then will user information be transmitted to the respective page. For information on the handling of your data when using the social media pages, please refer to the data protection information:

- Facebook: <https://www.facebook.com/privacy/policy/>
- Twitter (now "X"): <https://x.com/en/privacy>
- LinkedIn: <https://www.linkedin.com/legal/privacy-policy>
- YouTube: <https://policies.google.com/privacy?hl=en&gl=us>
- Instagram: [https://privacycenter.instagram.com/policy/?entry\\_point=ig\\_help\\_center\\_data\\_policy\\_redirect](https://privacycenter.instagram.com/policy/?entry_point=ig_help_center_data_policy_redirect)

### **3.2. Active use of the website**

In addition to using our website purely for information purposes, you can also actively use our website to order one of our products, download information, sign up for a newsletter, register for an event or to contact us. In addition to the processing of your personal data described above for information purposes, we also process additional personal data necessary for tasks such as processing your order.

### **3.2.1. User inquiries**

In order to process and respond to your inquiries to us, e.g. via the contact form or to our email address, we process the personal data you provide in this context. In any case, this includes your name and your email address in order to send you an answer, along with the other information you send us in your message (especially in the mandatory fields “Type of inquiry” and “Your inquiry”). If you have submitted a contact form, you will receive an automatic confirmation to the email address you provided that we have received your request.

We process your personal data to respond to user inquiries based on the following legal grounds:

- to safeguard our legitimate interests in accordance with Article 6(1)(f) GDPR; our legitimate interest lies in responding appropriately to customer inquiries;
- if the inquiry is aimed at concluding a contract, the additional legal basis is Article 6(1)(b) GDPR.

You can also contact us via our chatbot on the website (see section [3.1.2.7](#) above). When contacting us via our chatbot, you may chat with a chatbot (i.e. with a technical system) and/or with our customer service. If necessary, we will ask you for your name or email address. We store your data so that we can continue communicating with you at a later date or send you the chat history. If required, we will also send you emails containing the requested information and our offers following the conversation through the chatbot.

We process your data for the above purposes based on the following legal grounds:

- Your consent, Article 6(1)(a) GDPR.

### **3.2.2. Creating a customer account on the Smart Portal e-commerce platform/our web store (also called “Smart Portal”)**

You can register for our webshop in order to place orders, view delivery times or manage orders, billing and delivery addresses on the e-commerce platform Smart Portal (“Smart Portal”), available at <https://www.atlascopco.com/nl-be/itba/products>, under the following link: <https://www.atlascopco.com/nl-be/itba/> If you are already one of our certified dealers, it

is possible that we have already activated your account. To register, you must enter the following personal data in the registration form provided in the Smart Portal under the link above and send it to us:

- Title
- Country, city, zip code
- Email address
- First and last name
- Company name
- VAT number
- Address
- Telephone number
- Specify which rights you require (with ordering rights/without ordering rights)

Our colleagues will then check your request as quickly as possible and send you an email, which you must confirm so that your personal account can be set up and activated. You will also receive your login data by email. If you click on the login link sent to you by email, you will be redirected to Microsoft (single sign-on service) so that you can log in to our e-commerce platform/webshop using your own Microsoft Office account.

The following data is also stored at the time of login:

- The IP address of the user,
- Date and time of login.

If you have an account, you can view the prices, stock availability, order history, place orders and manage deliveries (e.g. select a partial or full delivery) in the Smart Portal, depending on your authorization level. You can also manage your billing and delivery addresses. For further information on the handling of your data in the Smart Portal, please refer to the data protection information available [here](#).

We process your data for the above purposes based on the following legal grounds:

- for the performance of a contract or for the implementation of pre-contractual measures pursuant to Article 6(1)(b) GDPR, as the creation of the



account and the login area are required for the performance of the contract or the implementation of pre-contractual measures;

- with your consent, if the registration is for advertising purposes, such as receiving the newsletter, Article 6(1)(a) GDPR.

### **3.2.3. Registration for the Atlas Copco service tool ‘Where-is-my-Tool’**

You can register for our service tool “Where-is-my-Tool” (hereinafter “WIMT”) by going to <https://www.atlascopco.com/nl-be/itba/local/where-is-my-tool> and clicking on “Register now”. You will then be automatically redirected to our landing page <https://www.whereismytool.com/login>. You can click on “Request Account” here to open the registration form. In order to create an account for you, we need the following information: First and last name, country, email address, company name, telephone number, company address. When you submit your registration form, our staff will check your registration request and send a login link with your access data to the email address you have provided. If you click on the login link sent to you by email, you will be redirected to your Microsoft account (single sign-on service) so that you can log in to WIMT using your own Microsoft account.

The following data is also stored at the time of login:

- The IP address of the user,
- Date and time of login.

Once you have verified your Microsoft account, you can log in and use WIMT.

WIMT is an online platform which you can use to query the service status of your tools and measuring equipment in real time. Here you will find useful information and helpful functions, enabling you to actively shorten the throughput times of your tools, for example.

Where Is My Tool allows you to view and manage your orders and current contracts, among other things. You will receive:

- Overview of the entire tool inventory
- Overview of the current status of workshop orders and field service assignments
- Overview of due inspections and maintenance

- Access to relevant documentation (e.g. repair reports, test certificates)
- Access to the tool history
- Reminder/notification function for: Inspection & maintenance, quote approval, receipt & dispatch
- Registration of tools in the maintenance and repair process
- Viewing offers & placing orders

In order to constantly improve and optimize the features and functions of WIMT, We gather statistics on your usage behavior within the context of WIMT and analyze this data statistically as needed for this purpose.

We process your data for the above purposes based on the following legal grounds:

- For the fulfillment of a contract or pre-contractual measures pursuant to Article 6(1)(b) GDPR;
- to safeguard our legitimate interests in accordance with Article 6(1)(f) GDPR; our legitimate interests are based on our interest in being able to make WIMT available only to authorized users and securely, and to constantly improve the functions and features of WIMT for you.

#### **3.2.4. Registration for marketing materials**

You can request materials and documents (e.g. white papers) on our website or register for our newsletter. Your email address and, if applicable, your name and contact details are required for this purpose. You can also provide us with voluntary information, such as your telephone number, so that we can contact you.

We use the double opt-in procedure for ordering newsletters. This means that your registration is only complete once you have actively confirmed your registration by clicking on the link contained in a confirmation email sent to you for this purpose. If you request our materials and documents or subscribe to our newsletter, Marketo will automatically compare your data with any data we may already have stored in Salesforce, and your data will be stored in Salesforce for marketing purposes (see sections [3.1.2.5](#) and [3.1.2.10](#) for details).

We process your data for the above purposes based on the following legal grounds:

- for the performance of a contract or for the implementation of pre-contractual measures pursuant to Article 6(1)(b) GDPR, as registration and the login area are required for the performance of the contract or the implementation of pre-contractual measures;

with your consent, if the registration is for advertising purposes, such as receiving the newsletter, Article 6(1)(a) GDPR.

### **3.2.5. Registration for webinars**

If you register for an event or webinar on our website, we process your personal data in order to accept your registration.

We process the following data:

- Company
- Street
- Zip code
- City
- Country
- Information about the participant (title, department, position, first and last name, title if applicable, email, telephone)

For webinars we use the tool “TwentyThree” from TwentyThree ApS, Sortedam Dosserring, 7E 2200 Copenhagen N, Denmark. When you register for a webinar, your information is automatically matched with any existing data we may have stored in Salesforce through the Marketo integration with Twenty-Three, and your data is retained in Salesforce for marketing purposes (see sections [3.1.2.5](#) and [3.1.2.10](#) for details).

We process your personal data on the following legal basis:

- for the performance of a contract or for the implementation of pre-contractual or contractual measures pursuant to Article 6(1)(b) GDPR.

### **3.2.6. Advertising purposes, such as newsletters, document downloads**

With your consent, we use your data for advertising purposes, such as sending you our newsletter, sending you information via download links, e-books or white papers, advertising surveys, sending you product information, inviting you to events of interest, follow-ups, status messages or we use your data for market research purposes. We collect mandatory information such as your email address, but also information that you provide to us voluntarily. We use the voluntary information to continuously improve our customer relationship.

If you have provided us with your email address in connection with the purchase of goods or services, we may subsequently use it to send you a newsletter. In such cases, only direct advertising for our own similar goods or services will be sent via the newsletter.

We process your data to send newsletters, surveys, etc. and to personalize our communication on the basis of the following legal grounds:

- if you have given us your consent, in accordance with Article 6(1)(a) GDPR;
- if you have provided us with your email address in connection with the purchase of goods or services, or if we send you personalized advertising, to protect our legitimate interests in accordance with Article 6(1)(f) GDPR in conjunction with Article 7(3) UWG (German Unfair Competition Act); our legitimate interest is based on our economic interests in the implementation of advertising measures and target group-oriented advertising.

### **Right to object to use in the context of the conclusion of a contract**

If we receive your email address in connection with the conclusion of the contract and the provision of our products and you have not objected to the same, we reserve the right to regularly send you offers for similar products from our range by email. You can withdraw your consent this use of your email address at any time by sending a message to the contact option described below or via a link provided for this purpose in the newsletter email, without incurring any costs other than the transmission costs according to the basic rates.

### **Analysis of the response to marketing communication**

When we send you marketing information, we also analyze when and how you open it with the help of the software Marketo from the service provider Adobe (Adobe Systems Software Ireland Limited, 4-6 Riverwalk, Citywest Business Campus, Dublin 24, Republic of Ireland).

As a rule, the following data is stored:

- Sent/delivered
- Opening rate: Open/not open with date/time of 1st opening and number of openings
- Click on links (number of clicks, date/time of 1st clicks)
- Click-to-open rate,
- Country of opening and device used
- Cancellations
- Bounces (soft and hard bounces – indication of non-delivery).

Marketo processes this information on our behalf in order to create an evaluation and analysis for us. This helps us to avoid sending you unsolicited advertising. Instead, we send you advertising, such as newsletters or product recommendations that correspond to your areas of interest. In this regard, we also analyze which of our advertising emails you open to prevent sending you unnecessary emails. We also aim to provide you with relevant information. By monitoring open and click rates, we can better understand which content interests you.

The legal basis for analyzing the response to our newsletter is your consent in accordance with Article 6(1)(a) GDPR. Insofar as we send personalized and/or interest-based advertising, we collect preferences and evaluate the results, the legal basis is also Article 6(1)(f) GDPR (“legitimate interest”). Our legitimate interest is our economic interest in the implementation of advertising measures and target group-oriented advertising as well as in the maintenance of the customer base, the interest-based, optimized and personalized approach and support of customers. You can find more information on terms of use and data protection from or at Marketo at <https://www.adobe.com/legal.html>.

### **3.2.7. Compliance with legal regulations**

We also process your personal data in order to fulfill other legal obligations. These may impact us, particularly in relation to order processing or business communications. This includes, in particular, retention periods mandated by commercial, trade or tax laws.

We process your personal data on the following legal basis:

- to fulfill a legal obligation to which we are subject pursuant to Article 6(1)(c) GDPR in connection with commercial, trade or tax law, insofar as we are obliged to record and store your data.

### **3.2.8 Law enforcement**

We also process your personal data in order to assert our rights and enforce our legal claims. We also process your personal data in order to be able to defend ourselves against legal claims. Finally, we process your personal data insofar as this is necessary for the prevention or prosecution of criminal offenses.

We process your personal data for this purpose on the following legal basis:

- to safeguard our legitimate interests in accordance with Article 6(1)(f) GDPR, insofar as we assert legal claims or defend ourselves in legal disputes or we prevent or investigate criminal offenses.

### **3.2.9 Sale of companies, mergers, etc.**

We may process your personal data in order to complete a (partial) sale of the company or a merger (or similar processes such as a takeover in the context of liquidation, insolvency, dissolution, etc.) with another company. In the event that another company acquires or intends to acquire the assets/capital, which may include your personal data, from us or we carry out or seek to carry out a merger with another company, we may have to grant this company access to your personal data stored by us or transfer it for the purpose of examining and implementing the company sale/merger (e.g. to determine the value of the company, business risks, etc.).

We process your personal data on the following legal basis:

- to safeguard our legitimate interests pursuant to Article 6(1)(f) GDPR in order to plan and implement a planned sale of the company or a planned merger.

## **4. Purposes and legal bases of data processing for social media use**

To present our company and communicate directly with you, we use social media platforms from providers such as LinkedIn, Facebook, etc. (“providers”), through which we maintain our presence (e.g. in the context of company and employee profiles) and process your data.

### **4.1. Shared responsibility**

If data is collected on our website that is processed and utilized by both the provider and us for shared purposes (such as analysis or advertising), the operator and we share joint responsibility. Often, we are unable to deactivate this function. You can therefore contact both the respective provider and us with your request. We currently use the following providers:

- LinkedIn (including LinkedIn Sales Navigator) of LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland;
- Facebook (including Facebook Business Manager) of Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland;
- Instagram of Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland;
- Twitter (now “X”) of Twitter International Company, 1 Cumberland Place, Fenian Street, Dublin 2, D02 AX07, Ireland;
- YouTube and Google My Business of Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland.

Below you will find the links to the data protection declarations and information of the respective providers:

- LinkedIn (including LinkedIn Sales Navigator): <https://www.linkedin.com/legal/privacy-policy>
- Facebook: <https://www.facebook.com/privacy/policy/>
- Instagram: [https://www.facebook.com/help/instagram/155833707900388?cms\\_id=155833707900388](https://www.facebook.com/help/instagram/155833707900388?cms_id=155833707900388)
- Twitter (now “X”): <https://x.com/en/privacy>
- Google: <https://policies.google.com/privacy?hl=en>
- YouTube: <https://policies.google.com/privacy?hl=en>.

#### **4.2. Data protection officers of the providers**

In addition to our data protection officer (Section 2 of this Privacy Policy), you can also contact the following data protection officers of the respective providers:

- LinkedIn: <https://www.linkedin.com/help/linkedin/ask/TSO-DPO>
- Facebook: <https://www.facebook.com/help/contact/540977946302970>
- Instagram: <https://www.facebook.com/help/contact/540977946302970>

- Twitter (now “X”): [https://twitter.ethicspointvp.com/custom/twitter/forms/data/form\\_data.asp](https://twitter.ethicspointvp.com/custom/twitter/forms/data/form_data.asp)
- Google: [https://support.google.com/policies/contact/general\\_privacy\\_form](https://support.google.com/policies/contact/general_privacy_form)

## **4.3 Purposes and legal bases of data processing**

### **4.3.1 Informational use of our website**

You can visit our website without providing any personal details. If you only use our website for information purposes, i.e. if you do not register or otherwise provide us with information about yourself, we do not process any personal data, with the exception of the data that the operator collects and transmits to us within the scope of the cookies it uses.

### **4.3.2. Analysis and tracking**

For the purpose of analyzing and tracking the use of its social media platform and our website, the provider uses cookies that enable evaluation of your browsing behavior. This can improve the quality of the platform and website and their content. We learn how the platform and the website are used and so can constantly optimize our offering.

However, we have no influence on the data collected and data processing procedures, nor are we aware of the full extent of the data collection, the exact purposes of the processing or the retention periods. We also do not have any information regarding the deletion of the data collected by the platform operator. Web analysis is the collection, compilation and evaluation of data regarding the behavior of website visitors. A web analysis service collects data such as the website from which a user arrived (referred to as a referrer), which subpages were accessed, and how often or for how long a subpage was viewed. Web analysis is regularly used to optimize a website and for the cost-benefit analysis of Internet advertising. It is possible that the information gathered through the analysis and tracking of our website may be combined with other data collected during your use of the website and the platform. If you register on the platform, the operator may link data relating to your platform activities with your personal details (e.g. name/email address) on the basis of your consent, and so collect personal data to provide you with personalized and targeted information on your preferred topics, among other things.



Regarding the statistics provided to us by the platform operator, we can only influence them to a limited extent and cannot disable them. However, we make sure that no additional optional statistics are made available to us.

We process your personal on the following legal basis:

- Your consent in accordance with Article 6(1)(a) GDPR, which you gave to the provider when registering for the respective social media platform.

#### **4.3.3. Active use of the website**

In addition to using our website purely for information purposes, you can also actively use our website to get in touch with us. In addition to the processing of your personal data described above for information purposes, we also process additional personal data necessary for tasks such as processing your inquiry. This also applies when we actively use the website, such as when we contact you proactively or initiate business contacts.

##### **4.3.3.1. Sharing and publishing interactions with posts, reviews, photos, etc.**

You can comment, share or otherwise interact (like, recommend, review, etc.) with posts, photos, videos, etc. created by us on the provider's platform and on our website. We may share your content on our website if this is a function of the operator's platform, and communicate with you via the platform. Public messages etc. may be published by the operator, but will not be used or processed by us for any other purpose at any time.

In the case of reviews, we reserve the right to publish a response (e.g., to address an issue, offer goodwill gestures, etc.) to your message and encourage you to contact us again. The personal data that you publish voluntarily in the review may be processed.

Otherwise, we reserve the right to delete content only if deemed necessary.

We process your personal on the following legal basis:

- To safeguard our legitimate interests in accordance with Article 6(1)(1)(f) GDPR. Data processing is carried out in the interest of our public relations work and communication.

##### **4.3.3.2. User inquiries**

In order to process inquiries you submit to us, e.g. via contact forms, a chat or our email address, to answer them specifically and to provide you with the requested

information, we process the personal data provided by you in this context. This includes your contact details in order to send you an answer or to make any necessary queries, as well as any other information that you send us in this context. If you submit a request via the platform, we may also refer you to other, secure communication channels that guarantee confidentiality, depending on the required response. You always have the option of sending us confidential inquiries to the address stated in the legal notice or in this privacy policy. We may contact you electronically, by telephone or by post, depending on the nature of the request and its necessity.

We process your personal data to respond to user inquiries, requests for materials, etc. on the basis of the following legal grounds:

- to safeguard our legitimate interests in accordance with Article 6(1)(f) GDPR; our legitimate interest lies in responding appropriately to and implementing customer inquiries;
- if the inquiry is aimed at concluding a contract, the additional legal basis is Article 6(1)(b) GDPR;
- with your consent in the context of using the live chat, Article 6(1)(a) GDPR.

#### **4.3.3.3. Active use of social media by Atlas Copco**

We also actively use our presence on business-oriented platforms such as LinkedIn and associated tools such as the LinkedIn Sales Navigator to approach, communicate or initiate business contacts, etc. with you.

For this purpose, we process the data provided to us by the respective platform. In particular, this may include your name, your employer, your position at your employer, your education and other contacts on the respective platform.

Depending on how we contact you, additional data – such as the nature of the business relationship or the content of our communication – may be processed by us. In this case, we may also transfer your data to our CRM system and merge or link it with your existing data there.

We currently use the following providers and tools:

- LinkedIn
- LinkedIn Sales Navigator
- LinkedIn (Lead Gen) Ads
- Google My Business

We use LinkedIn Lead Gen Ads, among other tools, to acquire new customers and seek out applicants. Lead Gen Ads are advertising placements on LinkedIn that allow for the integration of forms, functions and content provided by LinkedIn to generate contacts on our LinkedIn profile. If you are a member of the LinkedIn platform, LinkedIn can assign access to the above-mentioned forms, content and functions to the user profiles there.

When you submit LinkedIn Gen forms to us, the information is transferred to Marketo (see section 3.1.2.5). This ensures that the submitted form information is integrated into your Marketo profile and subsequently into our CRM system, Salesforce, where it is linked and stored.

Further information on data protection and LinkedIn's Lead Gen Ads can be found at: <https://www.linkedin.com/legal/privacy-policy> or <https://business.linkedin.com/en-us/marketing-solutions/native-advertising/lead-gen-ads>.

You have the option of preventing this in future by setting an opt-out cookie: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.

We process your personal data to contact, communicate or initiate business contacts with you (including via our CRM) on the following legal bases:

- Your consent in accordance with Article 6(1)(a) GDPR, which you gave to the provider when registering for the respective social media platform, insofar as it concerns your platform user data (name, employer, position, usage behavior on the platform, etc.);
- to fulfill a contract or to carry out pre-contractual measures in accordance with Article 6(1)(b) GDPR, provided that we already have a business relationship with you or carry out pre-contractual measures via the platform based on your request (e.g. further contact or communication);
- to safeguard our legitimate interests in accordance with Article 6(1)(f) GDPR; our legitimate interest consists in the appropriate approach, communication or initiation of business contacts with you for the establishment, implementation, maintenance or termination of a business relationship with you.

Further information on data processing in our CRM system can be found in our privacy policy for customers and contacts.

#### **4.3.3.5. Compliance with legal regulations**

We also process your personal data in order to fulfill other legal obligations. These may impact us, particularly in connection with the processing of orders, bookings or business communication. This includes, in particular, retention periods mandated by commercial, trade or tax laws.

We process your personal data on the following legal basis:

- to fulfill a legal obligation to which we are subject pursuant to Article 6(1)(c) GDPR in connection with commercial, trade or tax law, insofar as we are obliged to record and store your data.

#### **4.3.3.6. Law enforcement**

We also process your personal data in order to assert our rights and enforce our legal claims. We also process your personal data in order to be able to defend ourselves against legal claims. Finally, we process your personal data insofar as this is necessary for the prevention or prosecution of criminal offenses.

We process your personal data for this purpose on the following legal basis:

- to safeguard our legitimate interests in accordance with Article 6(1)(f) GDPR, insofar as we assert legal claims or defend ourselves in legal disputes or we prevent or investigate criminal offenses.

## **5. Links**

Some sections of our website contain links to third-party websites. These websites are subject to their own data protection principles. We are not responsible for their operation, including data handling. If you transmit information to or via such third-party sites, you should check the data protection declarations of these sites before you submit any information that can be assigned to you personally.

## **6. Categories of recipients**

Initially, only our employees have access to your personal data.

Your data will only be shared with third parties if permitted or required by law, or if you have provided your consent. We also share your data with our service providers as necessary to deliver our services. We restrict the transfer of data to

what is necessary for us to provide our services to you. In certain cases, our service providers act as processors and are strictly required to follow our instructions when handling your data. In some cases, the recipients may independently manage the data that we transmit to them.

The categories of recipients of your data are listed below:

- Affiliated companies within the group of companies, insofar as they act as processors on our behalf and provide IT services, for example, or insofar as this is necessary for the provision of our services,
- Payment service providers and banks to collect outstanding payments from accounts or pay out refunds,
- E-commerce platforms (e.g. Intershop Communications AG)
- Call centers and complaint handlers to receive and process your inquiries and complaints,
- Agencies, printers and lettershops that help us with advertising measures, competitions, promotions, etc,
- Training providers to offer relevant eLearning programs,
- IT service providers who store data, support the administration and maintenance of systems, as well as file archivists and shredders;
- Logistics service providers to deliver goods etc,
- Credit agencies when accessing a credit report,
- Collection agencies and legal advisors for the enforcement of our claims,
- public authorities and institutions, to the extent that we are legally obliged to do so.

In addition, we may share your personal data within our global group of companies, e.g. with subsidiaries that require this data to fulfill our contractual and legal obligations or on the basis of our legitimate interests. This may be for economic, administrative or other internal business purposes; this applies only as long as your interests or fundamental rights and freedoms, which necessitate the protection of personal data, do not take precedence. Beyond this, we do not pass on your data to third parties.

Regarding our use of social media, we unfortunately cannot rule out or control whether the operator will share your data with other categories of recipients, due to insufficient information from the platform operators. Additional information about the recipients of data from the platform operators can be found in the privacy policies of the operators linked in [Section 4.1](#).

## **7. Third-country transfer**

We conduct business on a global scale. As a result, your personal data may be transferred to other parts of our company in countries outside the EU. Data is only transferred to countries outside the EU or the EEA (“third countries”) if this is required in the context of processing our contractual relationships or is required by law (e.g. reporting obligations under tax law), if you have given us your consent or during order processing.

When transferring data to third countries, we ensure compliance with a level of data protection within the meaning of Article 44 et seq. GDPR.

When using the tools Google Analytics 4, Google Adwords Remarketing, Drift, Marketo (etc.), we transfer your IP address or your truncated IP address to countries outside the EU, including the USA.

Your data may also be transferred to countries outside the EU, including the USA, as part of social media use. We have no influence on this. Additional information can be found in the data protection statements of the platform operators linked in section [4.1](#).

If we engage service providers in third countries and can influence this, they are required to comply with the European level of data protection, in addition to following written instructions, by agreeing to the EU standard contractual clauses. Alternatively, we transmit the data based on Binding Corporate Rules or an adequacy decision.

For further information, please contact our data protection officer.

Otherwise, we do not transfer your personal data to countries outside the EU or the EEA, or to international organizations.

## **8. Retention period**

### **8.1. Informational use of the website/social media presence**

If you use our website purely for information purposes, we store your personal data on our servers exclusively for the duration of your visit to our website. Once you have left our website, your personal data will be deleted within seven days.

If you use our social media presence purely for information purposes, the operator stores your personal data on its servers. Personal data and installed cookies are usually deleted by the operator. Unfortunately, we do not know the exact retention

and deletion periods, but these can be found in the respective data protection declarations linked in section [4.1](#).

Cookies installed by us are usually also deleted once you leave our website. However, this does not apply to cookies from Marketo and SalesForce. The data relating to the analysis of the response to the marketing communication will be stored for the duration of the respective marketing campaign (between one and 24 months, depending on the campaign) and deleted after the end of the campaign within two months at the latest, or following your valid objection. Google Analytics cookies are stored for a period of up to two years. Adobe Analytics cookies are stored for up to 24 months. You also have the option to delete installed cookies yourself at any time.

## **8.2. Active use of the website/social media presence**

If you actively engage with our website or social media presence, we initially store your personal data for the duration of responding to your inquiry, or for the length of our business relationship. This also encompasses both the potential and actual initiation of a contract (pre-contractual legal relationship) as well as the execution of a contract.

The login log files are retained for 90 days for security purposes and for support requests, after which they are deleted.

We process your data for the duration of your subscription to our newsletter or customer magazine, or until you withdraw your consent to receive them. This also includes the initiation of a contract (pre-contractual legal relationship) and the execution of a contract.

Additionally, we retain your personal data until any legal claims arising from our relationship with you are time-barred, in order to use it as evidence if necessary.

The period of limitation is usually between 1 and 3 years, but can also be up to 30 years.

We delete your personal data once the period of limitation has expired, unless there is a statutory retention obligation, for example under the German Commercial Code (Sections 238, 257(4) HGB) or the German Fiscal Code (Section 147(3), (4) AO). These retention obligations can range from two to ten years. During this period, the data will only be processed again in the event of an audit by the tax authorities.

## **9. Your rights as a data subject**

If your personal data is processed, you are a “data subject” within the meaning of the GDPR. You have the following rights vis-à-vis us as the controller, which you can also assert vis-à-vis the operator of the respective platform with regard to our social media presence. Please note that we do not have full control over the operator’s data processing operations. Our options depend largely on the company policy of the respective provider. Your rights as a data subject are as follows:

- Right to information

You can request information about whether we process your personal data. If this is the case, you have a right of access to this personal data and to further information related to the processing (Article 15 GDPR). Please note that this right to information may be restricted or excluded in certain cases.

- Right to rectification

In the event that personal data about you is not (or no longer) accurate or incomplete, you may request that this data be corrected and, if necessary, completed (Article 16 GDPR).

- Right to erasure or restriction of processing

If the legal requirements are satisfied, you can request the deletion of your personal data (Article 17 GDPR) or the restriction of the processing of this data (Article 18 GDPR). However, the right to erasure pursuant to Articles 17(1) and (2) GDPR does not apply, inter alia, if the processing of personal data is necessary for compliance with a legal obligation (Article 17(3)(b) GDPR).

- Right of objection

For reasons arising from your particular situation, you can also object to the processing of your personal data by us at any time (Article 21 GDPR). If the legal requirements are satisfied, we will no longer process your personal data.

- Right to data portability



Under the conditions outlined in Article 20 of the GDPR, you have the right to request that we provide you with the personal data you have submitted to us in a structured, commonly used and machine-readable format.

- Right to withdraw consent under data protection law

You have the right to withdraw your consent at any time. The revocation is only effective for the future, meaning it does not affect the legality of the processing carried out based on the consent prior to the revocation.

- Right to lodge a complaint with a supervisory authority

Without prejudice to any other administrative or judicial remedies, you, as a data subject, have the right to file a complaint with a supervisory authority – particularly in the Member State of your habitual residence – if you believe that the processing of your personal data by us violates the GDPR.

Our supervisory authority is:

State Commissioner for Data Protection and Freedom of Information North Rhine-Westphalia

Kavalleriestr. 2-4

40213 Düsseldorf

Germany

Phone: +49 (0) 211 38424 0

Fax: +49 (0) 211 38424 10

Email: [poststelle@ldi.nrw.de](mailto:poststelle@ldi.nrw.de)

The operators of the social media platforms have their registered office, and consequently their responsible supervisory authority, in other EU countries. As a rule, this is the Irish data protection authority (Data Protection Commission, 21 Fitzwilliam Square South, Dublin2, D02RD28, Ireland), but you can also address your complaints to the following German supervisory authorities:

- LinkedIn: The Bavarian State Office for Data Protection Supervision, Promenade 18, 91522 Ansbach;
- Facebook: The Hamburg Commissioner for Data Protection and Freedom of Information, Ludwig-Erhard-Str 22, 7. OG, 20459 Hamburg;

- Instagram: The Hamburg Commissioner for Data Protection and Freedom of Information, Ludwig-Erhard-Str 22, 7. OG, 20459 Hamburg;
- Twitter (now “X”): n/a, in the absence of an office in Germany, you can contact the supervisory authority in your federal state;
- Google: The Hamburg Commissioner for Data Protection and Freedom of Information, Ludwig-Erhard-Str 22, 7. OG, 20459 Hamburg.

**However, we recommend that you first direct any complaints to our data protection officer or the data protection contact of the respective platform operator. If possible, please send your requests to exercise your rights in writing to the address provided above or directly to our data protection officer.**

## **10. Scope of your obligations to provide data**

In principle, you are not obliged to provide us with your personal data. However, if you do not do so, we will be unable to provide access to our website or the operator of a social media platform, answer inquiries you submit to us, provide you with information etc. or enter into a contract with you.

## **11. Profiling / automated decision making**

When using Marketo, your data is processed in part automatically with the aim of evaluating certain personal aspects (profiling). This is done in order to provide you with targeted information and advice on products and services. This allows for communication and advertising that is tailored to your needs, including market and opinion research.

It is also possible that the operator of a social media platform may process your data in a partially automated manner with the aim of evaluating certain personal aspects (profiling). This may be done to offer you targeted information and advice regarding products and services. This allows for communication and advertising that is tailored to your needs, including market and opinion research.

Due to legal requirements, we are obliged to combat money laundering and fraud. Data analyses (including those for payment transactions) are also conducted.

These measures also serve to protect you.

Aside from this, we do not carry out any profiling and do not use any purely automated decision-making processes in accordance with Article 22 GDPR. If we

use additional procedures in specific cases in the future, we will notify you separately.

### **Right to object under Article 21 GDPR**

**You have the right to object at any time to the processing of your data on the basis of Article 6(1)(f) GDPR (data processing on the basis of legitimate interest) or Article 6(1)(e) GDPR (data processing in the public interest) if there are reasons for this based on your specific situation. This also applies to profiling based on this provision within the meaning of Article 4(4) GDPR. If you object, we will cease processing your personal data unless we can provide compelling legitimate grounds for the processing that outweigh your interests, rights, and freedoms, or if the processing is required for the establishment, exercise or defense of legal claims.**

**We also process your personal data in individual cases for the purpose of direct advertising. If you do not wish to receive advertising, you have the right to object to this at any time; this also applies to profiling insofar as it is linked to such direct advertising. We will take this objection into account in the future.**

**We will no longer process your data for direct marketing purposes if you object to processing for these purposes.**

**The objection can be made in any form and should be sent to the address stated in Section 1 if possible.**

## **12. Changes**

We reserve the right to change this privacy policy at any time. Any changes will be communicated by publishing the updated privacy policy on our website. Unless otherwise specified, such changes shall take effect immediately. Please check this privacy policy regularly to review the most current version.

Last updated in September 2024