

Privacy Notice

01.09.2024

When you visit a website, register for a service, handle contracts, or interact with us in other ways, personal data is processed. This happens both automatically (e.g. your IP address) and when you actively provide data (e.g. when you place an order). The General Data Protection Regulation (GDPR) requires us to inform you about this processing. For example, you should know what purposes we pursue, how long your information is stored, which legal basis the processing is based on, and which recipients of data there may be. This is what this privacy policy is about.

As a rule, the controller responsible for the processing of personal data is ZEIT Sprachen GmbH, Kistlerhofstraße 172, 81379 Munich. Further information about the company as well as contact options can be found at the end of this Privacy Notice.

Customer Service ZEIT Sprachen

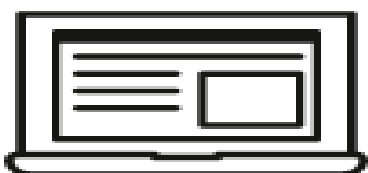
If you have any questions about your subscription, cancellations, or a withdrawal, please contact our Customer Service exclusively.

Companies of the ZEIT publishing group

The ZEIT publishing group includes the following companies:

Zeitverlag Gerd Bucerius GmbH & Co. KG, ZEIT Online GmbH, ZEIT Digital GmbH, ZEIT Sprachen GmbH, ZEIT Akademie GmbH, Studio ZX GmbH, ZEIT Weltkunst Verlag GmbH, academics GmbH, Good Jobs GmbH, and e-fellows.net GmbH & Co. KG.

For example, we offer journalistic content, travel, products, seminars, events, and special offers for subscribers.



Use of the website

Websites have different functions and ways to interact. Sometimes you can view content or use an online form to contact us. On other pages, you can register. Depending on the website, the scope of data processing varies.

Logfiles

When you visit a website, technical usage data (so-called log data) is processed temporarily. This data is transmitted by your browser and

includes, among other things, your computer's IP address, the client request (file name and URL), the HTTP response code, and the website from which you came to our website.

The data processing described is permitted to protect legitimate interests (Art. 6(1)(f) GDPR). We depend on achieving the greatest possible reach for our companies and content. Operating a website is essential for this. The processing happens automatically and cannot be prevented. It is technically necessary in order to access a website.

The log data is deleted or anonymized as soon as it is no longer needed.

Data processing on end devices

When you access the website, a so-called consent banner appears with information about data processing on your end device. There you will find details about the services we use and the cookies that are set. Cookies are small text files that are stored on your end device when you visit a website. Cookies are used to store information related to a website locally on your computer for a certain period of time and to transmit it back to a server upon request. This can serve different purposes.

Some of the data processing that takes place is legally permitted for providing the website (§ 25(2) TDDDG). This includes setting cookies that are strictly necessary for certain actions to work. Some processing only takes place if you have given your consent (Art. 6(1)(a) GDPR, § 25(1) TDDDG). In the consent banner, you can agree to or refuse specific types of processing. You are not required to consent to the data processing options offered. However, you cannot prevent the technically necessary processing, as the website's functionality could otherwise not be ensured.

Detailed information about the services used, the purposes of processing, the storage period, and other conditions can be found in the consent banner and in the following paragraphs.

Functionality, analytics, and performance

Um unsere Angebote zu verbessern, analysieren wir die Nutzung unserer Website. Dazu verwenden wir Tools, die jeweils unterschiedliche Daten erheben und für uns auswerten. Dies geschieht teilweise durch auf Ihrem Endgerät abgelegte Cookies und andere Technologien. Anhand der entstehenden Statistiken und Reports können wir sehen, welche Inhalte besonders beliebt sind, welche Unterseiten wann aufgerufen werden und ob es technische Probleme gibt. Welche Tools eingebunden sind, ergibt sich aus dem Consent-Banner.

Die stattfindende Datenverarbeitung ist von Ihrer Einwilligung abhängig (Art. 6 Abs. 1 a) DSGVO). Das gleiche gilt für die Speicherung von Informationen auf Ihrem Endgerät und den Zugriff auf Informationen, die bereits gespeichert sind (§ 25 Abs. 1 TDDDG). Sie können im Consent-Banner auswählen, ob Sie die Verarbeitung für einen bestimmten Zweck insgesamt zulassen oder konkret einzelne Dienste auswählen. Die Bereitstellung Ihrer Daten ist freiwillig und hat keine Auswirkung auf die Nutzung unserer Websites und Produkte.

Informationen zu den einzelnen Tools und der konkreten Verarbeitung (insbesondere Name des Anbieters, Datenkategorien, Zweck, Speicherdauer) finden Sie im Consent-Banner.

Marketing Measures

We ourselves depend on advertising our services on the internet. We use various forms of personalised advertising to reach you and other potential customers directly. For this purpose, we use different tracking tools to track online activities across different websites and link them together. The processing is carried out using technologies such as cookies, pixels, or scripts and includes information about which pages you visit and for how long, which offers you view, which device and operating system you use, and your approximate geographical location (which can be determined based on the IP

address). The data is linked with other information to create a meaningful profile. This helps us better understand who you are and what interests you have. The collected information is used to show you personalised advertising. This means that you may see ads on our websites and on those of other providers that are tailored to your interests, preferences, and previous activities. Personalised advertising increases the likelihood that you click on our ads and use our services. We can also offer our advertising customers better opportunities to present their products or services to a relevant target group.

The processing described only takes place if you have given your consent via the consent banner (Art. 6(1)(a) GDPR, Section 25(1) TDDDG). Providing your data for the purpose described is voluntary.

You can find information about the individual tools and the specific processing (in particular the name of the provider, data categories, purpose, storage period) in the consent banner.

Third-Party Content, Features and Services

Various external media from third-party providers are embedded on our website (e.g. videos, audio recordings, interactive maps, or social media posts). Due to this embedding (e.g. via HTML or JavaScript), your browser is instructed to establish a connection to the server of the respective third-party provider. This results in data being transmitted (at least the IP address, but also the referrer URL) and, where applicable, information being stored on or read from your device. The third-party provider may, under certain circumstances (in particular if you are actively logged in there), link this information with data about you that it has already stored. In this way, it may receive very detailed information about your interests outside its own platform.

If, when accessing the external media and content, the linking described above of personal data takes place, the processing depends on your consent (Art. 6(1)(a) GDPR and Section 25(1) TDDDG). You are

free to allow this. However, if you do not agree to the processing, you cannot use the corresponding external media and content (and, for example, cannot watch a video embedded on our site). Not all third-party providers link personal data. If, for the embedding, only usage data that is technically necessary is processed, the processing is permitted to safeguard our legitimate business interests (Art. 6(1)(f) GDPR and Section 25(2) TDDDG).

You can find information about the individual tools and the specific processing (in particular the name of the provider, data categories, purpose, storage period) in the consent banner.

Consent Management Platform

To control data processing on the website in compliance with data protection law, we use a consent banner to obtain consent. We store the settings you have chosen by placing cookies.

The data processing that takes place on your device is permitted or necessary to safeguard our legitimate interests and to provide our service (Art. 6(1)(f) GDPR, Section 25(2) No. 2 TDDDG). In order to operate our website in compliance with data protection law, we must electronically document whether consent has been given and whether it has been withdrawn. Otherwise, in case of doubt, we may not be able to prove that you have consented to certain processing operations. In this respect, the data processing is necessary in order to use our website.

The cookies used to store your settings are stored until you withdraw your consent.

Requests via the Website

We offer various ways to contact us (e.g., online contact form, email contact address, feedback form). We process the data and information

you provide in order to respond to your request. We use feedback on our products or reports of errors to improve them and to fix errors.

The data processing in a (pre-)contractual context, for communication and for fixing errors is permitted by law (Article 6(1)(b), (f) GDPR, Section 25(2) TDDDG). Providing your personal data is necessary in order to communicate with us and, in the case of feedback, to enable error correction.

We store the data for a period of 6 months. If you register with us or if there is another type of further contact, your data will continue to be stored and will only be deleted after the applicable statutory retention obligations have expired.

Registration

You have the option to register using your email address and gain access to extended functions and content of the website. In this process, a user account linked to the email address is created, to which the actions you carry out on the website can be assigned.

The legal basis for the processing of personal data is the user relationship created by the registration (Art. 6(1)(b) GDPR). Providing your data is necessary for the registration, as otherwise no user account can be created for you.

Your data will be stored for the duration of the user relationship and any statutory retention obligations.



Promotions, contracts, and subscriptions

The companies of the ZEIT publishing group offer various products and services. If you, for example, take out a subscription, book a trip, or participate in a competition, different personal data will be collected, used, and passed on to other companies for the purpose of contract fulfillment.

Taking out a subscription

When you take out a subscription, we collect various data from you. We use this data to provide the subscription and to invoice you.

The data processing is permitted by law for the performance of the resulting contract (Article 6(1)(b) GDPR). Providing the requested data is required in order to conclude the subscription.

Your data record is stored in our customer database for the duration of your subscription. Any storage beyond this period serves to comply with the statutory retention obligations applicable to us.

Taking out a trial subscription

We regularly offer the option of taking out a trial subscription so that you can test our services. Depending on the product, different data is collected and used to provide the offer.

The data processing is permitted for the performance of resulting contracts as well as for the purposes of our legitimate interests (Article 6(1)(b), (f) GDPR). Providing your data is voluntary, but necessary for us to provide our offer. If taking out a trial subscription is a prerequisite for participating in a competition, failure to provide your data will result in you being unable to participate.

Contract documents inevitably include tax-relevant commercial and business correspondence, which is subject to a statutory retention period of up to 8 years. In order to be able to trace all processes and

provide information in the event of an official audit, we store all documents and data for at least this period.

Payment (service providers)

We use payment service providers to offer you as many payment methods as possible with a single click. These providers are responsible in particular for forwarding the amounts paid to us and for controlling payment flows.

The integration of payment service providers and the transfer of your data that takes place in this context is permitted for the purposes of our legitimate business interests (Article 6(1)(f) GDPR). We are not able to map the necessary processes in a legally compliant manner ourselves. For this reason, we have chosen external payment service providers. Data processing occurs automatically when you select one of the payment methods offered and complete the payment on the provider's website. The data processing is necessary for the payment.

We do not store any bank details in our systems. We only retain information on the amounts to be paid and whether they have been settled.

Prize draw

We regularly conduct prize draws and collect various data for this purpose. We process this data to verify eligibility, determine and notify the winner, send the prize, and, if applicable, publish a winner list.

The data processing carried out in the context of a prize draw is permitted by law (Article 6(1)(b) GDPR). Participation constitutes a type of contract for which the data we request is necessary. If you do not provide the requested data, you cannot participate in the prize draw.

The data collected in connection with our prize draws is stored until the process has been fully completed (determination and notification of the winners, dispatch of the prize). Further storage may occur as part of associated processing activities (e.g., taking out a trial subscription or signing up for a newsletter, if this was a prerequisite for participating in the prize draw). Any publications are not subject to a time limit.

Surveys

We conduct online surveys to assess the quality of our services or to gather information about interests. Opinions and views are collected, which we analyze and use to improve our services. If prizes are drawn among survey participants, we additionally collect contact details that are not linked to the survey results.

The data processing carried out serves the purposes of our legitimate business interests (Article 6(1)(f) GDPR). We want to take our customers' opinions into account when developing our services and need data that is as meaningful as possible for this. Participation in our surveys is voluntary. Providing contact details is necessary in order to be considered for a prize draw.

We store the anonymized survey results for an unlimited period. Non-anonymizable data is stored for a period of 6 months from the time of collection. Contact details are stored for the duration of their subsequent use.

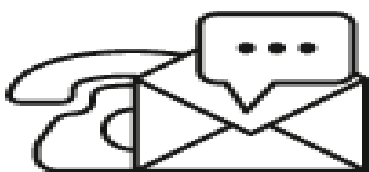
Umfrage zur Sprachen-App

Um unsere Sprachen-App zu verbessern, führen wir Umfragen zu Ihren Gewohnheiten, Vorlieben und Stärken beim Lernen durch. Erhoben werden Ihre Selbsteinschätzung und Meinung zum Umgang mit der Sprachen-App sowie zu Ihren Fähigkeiten beim Erlernen einer Sprache.

Die Angaben helfen uns dabei, die Funktionsweise der Sprachen-App sowie die Lerninhalte noch besser und zielgruppengerechter zu gestalten. Neben automatisierten Umfragen führen wir auch persönliche Interviews durch, um noch gezielter bestimmte Themen abfragen zu können. Diese Interviews finden über eine Online-Meeting-Software statt und beinhalten auch die Übertragung von Audio- und Videodaten. Sofern Gewinne unter den Teilnehmern verlost werden, fragen wir weitere Kontaktdaten ab und verwenden diese zur Bereitstellung der Preise.

Die stattfindende Datenverarbeitung dient der Wahrung unserer berechtigten Unternehmensinteressen (Art. 6 Abs. 1 f) DSGVO). Wir möchten die Meinung unserer Kunden bei der Weiterentwicklung unserer Leistungen berücksichtigen und benötigen hierfür möglichst aussagekräftige Daten. Die Teilnahme an unseren Umfragen und Interviews ist freiwillig. Die Angabe von weiteren Kontaktdaten ist erforderlich, um bei der Verlosung eines Gewinns berücksichtigt werden zu können.

Die Umfrageergebnisse werden anonymisiert, sodass kein Personenbezug mehr herstellbar ist. Die zusätzlichen Kontaktdaten werden für die Dauer ihrer anschließenden Verwendung gespeichert.



Communication

Wir nutzen verschiedene Kommunikationskanäle, um mit Ihnen in Verbindung zu treten, Mitteilungen entgegenzunehmen oder Ihnen interessante Angebote und Informationen zukommen zu lassen. Werbliche Ansprache ist wichtig für unser Unternehmen, um wirtschaftlich erfolgreich zu sein. Sie können der Nutzung Ihrer personenbezogenen Daten zu werblichen Zwecken jederzeit

widersprechen und / oder sich von unseren E-Mail-Newslettern über den Abmelde-Link am Ende jedes Newsletters austragen.

Newsletter

We offer various newsletters that you can subscribe to by providing your email address. You will then receive information about various offers (from us or from third parties).

Using your email address to send our newsletters depends on your consent (Art. 6(1)(a) GDPR). Providing your data is voluntary and has no effect on any contractual relationship you may have with us. If subscribing to a newsletter is a requirement for participating in a prize draw or receiving editorial content (e.g. in the form of an eBook), failure to provide the data means that you cannot participate or will not receive the content.

Your email address will be stored in our newsletter database for as long as your consent remains in place. As soon as you withdraw your consent, it will be deleted from the relevant database.

Editorial Newsletters

We offer various editorial newsletters, which you can in some cases subscribe to separately or receive automatically as an additional part of a subscription.

We use your email address to send our editorial newsletters either based on your consent (Art. 6(1)(a) GDPR) or because this is legally permitted on the basis of a contract (Art. 6(1)(b) GDPR). Where consent is used, providing your data is voluntary. If the sending takes place as part of a contract, providing your data is required.

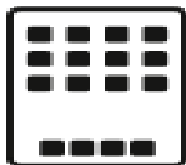
Your email address is stored in our newsletter database for as long as your consent remains in place and/or a contract exists.

Recommendation of Similar Offers

We use the email address you provide when you log in, register, place an order, or make a booking to send you advertising for our own similar offers.

The use of email addresses to send our own similar offers is expressly permitted by law and does not depend on consent (Section 7(3) UWG). However, providing your personal data in this context is voluntary, and you can object at any time (either by contacting us or via the link at the end of each advertising email).

If you object to the use for advertising purposes, your data will be deleted or blocked for advertising. Deletion is usually not possible because we must continue to store the data collected during a login, registration, order, or booking in order to comply with statutory retention obligations.



Mobile apps

In order to enable you to use our content optimally on all devices, we offer mobile apps for common smartphones and tablets. Whether a mobile app is available for your device and operating system can be seen in the respective platform's app store.

Download and installation

When you download our mobile app, information is transferred to the app store. This includes, in particular, the username, email address and customer number of your account, the time of the download, payment information and the individual device identifier. We have no influence

on this data collection and are not responsible for it. We process the data only to the extent necessary for downloading the app to your mobile device.

The processing that takes place is permitted in order to enable use (Art. 6(1)(b) GDPR). It is necessary to establish a connection between your device and the app store and to download the data packages required for installation.

We do not store the data separately on our side.

ZEIT Sprachen App

Mit unserer ZEIT Sprachen App können Sie Ihren Lernfortschritt nachvollziehen, Bookmarks setzen und andere Funktionen und Angebote nutzen. Die Anmeldung erfolgt über Ihr vorhandenes Nutzerkonto (E-Mail-Adresse und Passwort). Sie können in der ZEIT Sprachen App auch Ihren Abo-Status nachvollziehen (aktives oder inaktives Abo, Test-Abo). Um unsere Leistungen zu verbessern, analysieren wir die Nutzung der App und wie Sie mit den Inhalten interagieren. Die Verarbeitung findet sowohl lokal auf Ihrem Endgerät als auch in unserer Datenbank statt.

Die stattfindende Verarbeitung ist gesetzlich erlaubt, um Ihnen die Nutzung der verschiedenen Funktionen zu ermöglichen (Art. 6 Abs. 1 b) DSGVO). Die Bereitstellung Ihrer Daten ist in diesen Fällen erforderlich, um die App verwenden zu können. Die Nutzungsanalyse findet nur mit Ihrer Einwilligung statt (Art. 6 Abs. 1 a) DSGVO, § 25 Abs. 1 TDDDG). Sie können entsprechende Einstellungen innerhalb der App treffen und Ihre Einwilligung jederzeit erteilen oder widerrufen.

Wenn Sie die ZEIT Sprachen App löschen, gehen nur die lokal gespeicherten Inhalte verloren. Ihr Nutzerkonto bleibt unabhängig davon bestehen.

Push notifications

You have the option to receive breaking news and recommendations as push notifications on your mobile device. In addition to article recommendations, you will also receive information about new features and offers. For this purpose, we process your device's push token, an assigned channel ID, and, if applicable, your user ID. You can switch these push notifications on and off in the app settings.

The data processing takes place exclusively on the basis of your consent (Art. 6(1)(a) GDPR). Providing your data is voluntary. Please note, however, that you may miss notifications if you do not give your consent. You can disable push notifications at any time in the app settings.

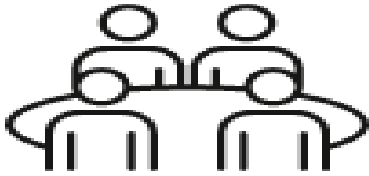
The data generated will be deleted from the database no later than 13 months after the last time the app was started.

Registration

You have the option to register using your email address and gain access to extended functions and content of the website. In this process, a user account linked to the email address is created, to which the actions you carry out on the website can be assigned.

The legal basis for the processing of personal data is the user relationship created by the registration (Art. 6(1)(b) GDPR). Providing your data is necessary for the registration, as otherwise no user account can be created for you.

Your data will be stored for the duration of the user relationship and any statutory retention obligations.



Joint controllers

ZEIT publishing group

Due to the close cooperation within the ZEIT publishing group, mutual data exchange as well as the shared use of systems and applications are unavoidable. For this reason, some processing operations take place under joint controllership. The agreement concluded accordingly between the involved ZEIT companies pursuant to Article 26 GDPR regulates in particular who is responsible for complying with the various obligations under the GDPR.

General infrastructure and communication

The companies of the ZEIT publishing group use a shared infrastructure and communicate via centrally managed devices. Zeitverlag Gerd Bucerius GmbH & Co. KG provides the essential telecommunications services and applications and, together with the other companies, is jointly responsible for the data processing that takes place.

Joint controllers: Zeitverlag Gerd Bucerius GmbH & Co. KG, ZEIT DIGITAL GmbH, ZEIT Akademie GmbH, Studio ZX GmbH, ZEIT Sprachen GmbH, academics GmbH, ZEIT Online GmbH, ZEIT Weltkunst Verlag GmbH

Data Warehouse

To analyze, monitor, and optimize advertising measures, we process personal data in a data warehouse that is separate from the production

systems. The information is pseudonymized there and used for specific questions, for group profiling, and for creating engagement and propensity scores.

If we have obtained consent for the collection of the data, any further processing is also carried out on this basis (Art. 6(1)(a) GDPR).

Otherwise, the analysis and internal provision of the pseudonymised data are carried out to safeguard our legitimate corporate interests (Art. 6(1)(f) GDPR). In order to make economically sound decisions and remain competitive, we need to understand our customers' requirements, identify changes, and be able to respond to them.

The duration of pseudonymized storage in the data warehouse is based on the retention periods in our other systems (e.g., newsletter database, event database). When the data can be deleted there, it can no longer be accessed via the data warehouse.

Joint controllers: Zeitverlag Gerd Bucerus GmbH & Co. KG, ZEIT Online GmbH, ZEIT Sprachen GmbH, academics GmbH, Studio ZX GmbH, ZEIT Akademie GmbH

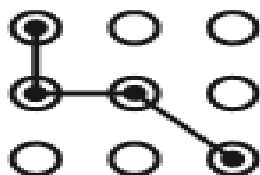
Other companies

The use of some services takes place jointly with the respective provider, so that an agreement on joint controllership pursuant to Article 26 GDPR must also be concluded here. As a rule, this is an integral part of the terms of use and is provided by the provider in a standardized form. In some cases, the joint controllership also concerns the organization of events or joint projects.

Providers of social media platforms

We maintain profiles on various social media platforms in order to present our services and to interact with users. The data processing that takes place when you visit our profiles is partly carried out under

joint controllership with the platform operator. Further information on this can be found in the section Social Media Profiles.



Recipients and Place of Processing

We process personal data in various systems and, depending on the processing activity, transfer it to other companies, public authorities or individuals. The location of the processing depends on our registered office as well as the locations of our service providers.

Processors

We use various processors, such as software providers, data centre operators, call centres and IT service providers. We have carefully selected these companies and concluded a data processing agreement pursuant to Art. 28 GDPR. If, in addition to the companies listed in the Privacy Center, other processors are involved in the processing of data, they are listed below.

List of companies

- DPV Deutscher Pressevertrieb GmbH (subscription processing)
- annodare GmbH (customer service)
- Emarsys Interactive Services GmbH (newsletter tool)
- Güll GmbH (shipping and returns processing)
- Freshworks Inc. (SaaS ticketing system provider)
- Microsoft Ireland Operations, Ltd. (SaaS provider)
- Usercentrics GmbH (CMP platform)
- Amplitude, Inc. (analytics tool)
- Arnia Software SRL (software development)

- Google Ireland Ltd. (SaaS provider)
- MGM Technologie Partners GmbH (hosting)
- Brandpfeil GmbH (web development)

Third parties

Some activities involve the disclosure of personal data to third parties. These may include providers of website tools, cooperation partners, shipping service providers or suppliers. These companies independently determine the purposes of further processing and must ensure compliance with data protection law. If, in addition to the companies already mentioned elsewhere, other third parties are involved in the processing of data, they are listed below.

List of companies

- Telecommunications provider (for telephone contact)
- Shipping service provider (for postal delivery)

Place of processing

As a rule, data processing takes place in the European Union and/or the European Economic Area. However, we also use applications and tools where a transfer of data to third countries cannot be ruled out. In such cases, we ensure that appropriate safeguards are in place to guarantee an adequate level of data protection in these third countries. As a rule, the Standard Contractual Clauses provided by the European Commission have been agreed with the providers, or the provider is certified under the Data Privacy Framework.



Rights of the data subject and Contact

Under the GDPR, data subjects generally have a number of rights. You can exercise these at any time. However, we are not always obliged to grant a right. For example, a request for erasure may be refused due to statutory retention obligations. Where processing is carried out under joint controllership, you may exercise your rights against any of the companies involved.

Rights of the data subject

You have the right of access (Art. 15 GDPR), rectification (Art. 16 GDPR), erasure (Art. 17 GDPR), restriction of processing (Art. 18 GDPR) and data portability (Art. 20 GDPR).

Right to object

We have checked whether we are allowed to process your personal data. This applies in particular to all processing carried out for the purposes of legitimate interests (Art. 6(1)(f) GDPR). If you believe that a specific processing activity is not permissible, you can let us know. If, in your individual case, we come to the conclusion that we are indeed not permitted to process your data, we will stop doing so. If your objection relates to advertising messages, we will of course implement it immediately.

Right to withdraw consent

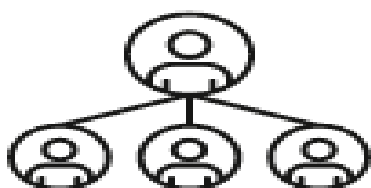
Some processing activities are based on consent you have given. You can withdraw this consent at any time with effect for the future.

However, this does not affect the lawfulness of the processing carried out up to that point.

Contact details

To exercise your data protection rights and for questions and complaints regarding data protection, please use exclusively the email address datenschutz@zeit-sprachen.de or our postal address.

You can reach our external data protection officer by post at Herting Oberbeck Datenschutz GmbH, Hallerstr. 76, 20146 Hamburg, or via the email address dsb@zeit.de. You also have the right to lodge a complaint at any time with a supervisory authority.



Social Media Profiles

We maintain profiles on social networks in order to publish our content and to get in touch with users. Like you, we have created an account for this purpose and have agreed to the terms of use of the respective social network.

Responsibility for data processing differs from network to network. It may be separate controllership or joint controllership pursuant to Art. 26 GDPR and, in some cases, even processing on behalf pursuant to Art. 28 GDPR. The assessment results from the terms of use and integrated agreements of the platform providers, which we use (and must use) as the basis for our information.

The data processing that takes place when you access the social networks is specified by the providers. We can only provide

information about the activities that are within our sphere of influence and that can be controlled by us.

Meta profiles

Joint controllership

We use our Meta profile to make information publicly available, place advertisements and communicate with users. The data processing that takes place when a profile is accessed is carried out under joint controllership between us and the platform provider. For this reason, we have concluded an agreement pursuant to Art. 26 GDPR, which in particular governs the fulfilment of data subject rights.

The various Meta platforms are operated by Meta Platforms Ireland Limited, Block J, Serpentine Avenue, Dublin 4, Ireland. The provider is responsible for the lawfulness of the data processing via the respective social network. The company is represented by director Gareth Lambe. Meta Platforms Ireland Limited has appointed a Data Protection Officer, whom you can contact at any time.

You can exercise your data subject rights at any time against us or Meta Platforms Ireland Limited. As a rule, however, these rights can usually only be fulfilled by the latter, so we will forward such requests.

Insights data

When you access our profile, Insights data is collected and analysed. These are aggregated statistics created based on certain actions logged by Meta Platforms Ireland Limited. This mainly concerns how you interact with our profile and other content. We have no way to identify you via the Insights data or to assign it to a profile. Insights data is also collected from people who do not have an account. In that case, however, the user is asked for consent when accessing the platform – without it, no content can be viewed.

Meta Platforms Ireland Limited bases the lawfulness of processing Insights data on legitimate interests in the form of optimising advertisements (Art. 6(1)(f) GDPR). We use it ourselves to improve our profile and to provide content that is read by many people. To improve our reach, we need many views and a lot of traffic on our profile. The more we tailor the content to the interests of our users, the more likely we are to achieve this.

For us, the Insights data is part of the functions provided by the social network. The processing is governed by the terms of use that all profile owners must accept. When you created your own account, you therefore contractually permitted the processing. If you do not accept the terms of use, you cannot maintain a profile. In this respect, providing the Insights data is necessary for use.

The Insights data collected via our profile is processed in anonymised form. This means that the data is modified so that it can no longer, or only with a disproportionately large amount of time, cost and labour, be attributed to a specific or identifiable natural person.

Direct messages and likes

We use our account to get in touch with you and to interact with you. This is possible via direct messages, the like function or comments. In this context, the name stored in your profile is always displayed.

The lawfulness of this processing is based on legitimate interests (Art. 6(1)(f) GDPR). Communicating with you is important to us in order to answer questions, address criticism and exchange information. This is the only way we can improve our services. You can use the various options for communication, but you do not have to. The content of our profile can be viewed independently of this.

Comments are stored on our profile for an unlimited period of time and can be viewed by other users until you delete the comment yourself. The same applies to using the like function. Direct messages are also stored, but are deleted at regular intervals.

Objection to the processing of Insights data

Since Insights data is also used for advertising purposes, there is generally a right to object pursuant to Art. 21 GDPR. Meta Platforms Ireland Limited provides various forms for exercising rights in its privacy policy. There you can object to the processing of data. You can also exercise this right against us, and we will then forward the request to the provider.

Please note that, if you object to the processing of Insights data, use of the platform may be limited or may no longer be possible at all.

Data disclosure and third-country transfers

Data processing takes place on servers of Meta Platforms Ireland Limited. Direct messages are seen and answered by our employees. All other actions are publicly visible.

Our profile on the social network can be accessed worldwide via the internet, meaning that access from countries without an adequate level of data protection is possible. Meta Platforms Ireland Limited has taken various measures to ensure an adequate level of data protection.

LinkedIn profiles

LinkedIn account and communication with users

We maintain various LinkedIn accounts in order to network with companies and individuals. There we present ourselves, share posts and interact with other LinkedIn users. In doing so, we can see the content published on your profile and use it to communicate with you. For example, we share and comment on posts, tag LinkedIn users or use the messaging function.

The data processing carried out directly by us is for the purposes of our legitimate business interests (Art. 6(1)(f) GDPR). We rely on the widest possible reach and therefore on professional networks such as

LinkedIn. Making contact is facilitated by ongoing interaction with users and the information available in profiles. Communication with us and interaction with our profile is voluntary.

If you would like to learn more about data processing when using LinkedIn, please read the provider's [LinkedIn Privacy Policy](#) (LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland).

Page Insights

When you visit our LinkedIn profile, follow the page or engage with it, LinkedIn Ireland Unlimited Company processes personal data in order to provide us with statistics and insights in anonymised form. This gives us insights into the types of actions people take on our page (so-called Page Insights). For this purpose, the social network processes in particular data that you have made available in your profile (e.g. job function, country, industry, seniority, company size and employment status). In addition, information is processed about how you interact with our LinkedIn company page. The processing serves our legitimate interest in analysing the types of actions taken on our LinkedIn company page and improving our company page based on these insights (Art. 6(1)(f) GDPR).

With Page Insights, LinkedIn Ireland Unlimited Company does not provide us with any of your personal data. We only have access to aggregated and anonymised Page Insights. Nor is it possible for us to draw conclusions about individual members via Page Insights. The processing described is carried out by LinkedIn Ireland Unlimited Company and us as joint controllers. For this reason, there is a [joint controllership agreement pursuant to Art. 26 GDPR](#) with the provider, which stipulates the following:

LinkedIn Ireland Unlimited Company is responsible for enabling you to exercise your rights under the GDPR. You can [contact the company online](#) or reach it via the [contact details provided in the privacy policy](#). You can contact the [Data Protection Officer](#) via an online form. You can also contact us regarding the exercise of your rights in connection with

the processing of personal data as part of Page Insights. In such a case, we will forward your request to the social network.

LinkedIn Ireland Unlimited Company and we have agreed that the Irish Data Protection Commission is the lead supervisory authority for monitoring the processing of data via Page Insights. You always have the right to lodge a complaint with the Irish Data Protection Commission (see www.dataprotection.ie) or with any other supervisory authority.

Recipients of data

We use LinkedIn only as a platform and comply with the provider's terms of use. We ourselves have no influence on which data is processed when our profile is accessed or who can see your profile. In this respect, like you, we are only a user.

However, we have employees who take care of our LinkedIn profiles. Incoming messages are viewed and processed by them. Depending on how you interact with our content, your profile and your publications may be seen by other users. When using LinkedIn, data is transferred to third countries outside the European Union and the European Economic Area. According to the provider, this is legitimised by Standard Contractual Clauses.

Storage period

If you leave a comment, it will be stored on our profile for an unlimited period of time (until you delete it). The same applies to using the like function. Direct messages to us are also stored, but are deleted at regular intervals.