

## Privacy policy

### 1. Information on the collection of personal data

1.1 In this privacy policy, we inform you about the collection of personal data from you as the data subject and its processing in the context of the use of our website.

1.2 The entity responsible for data processing is: GBC AG  
Halderstrasse 27  
86150 Augsburg  
Phone: +49 (0) 821 / 241133-0  
Fax: +49 (0) 821 / 241133-30  
E-mail: [office@gbc-ag.de](mailto:office@gbc-ag.de)

1.3 You can reach our data protection officer at Jochen Jahn  
BGfD Bayreuther Gesellschaft für Datenschutz mbH  
Telemannstr. 1  
95444 Bayreuth  
Phone: +49 (0) 921 / 163245-40  
Fax: +49 (0) 921 / 163245-41  
E-mail: [datenschutz@gbc-ag.de](mailto:datenschutz@gbc-ag.de)

### 2. Definitions

2.1 The data protection declaration of GBC is based on the terms used by the European legislator for the adoption of the General Data Protection Regulation (GDPR). Our privacy policy should be easy to read and understand for the public as well as for our customers and business partners. To ensure this, we would like to explain the terms used in advance.

#### 2.1.1 Personal data

Personal data means any information relating to an identified or identifiable natural person (hereinafter "data subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic or mental characteristics of that natural person,

The data subject is a natural person whose identity, mental, economic, cultural or social identity can be identified.

### **2.1.2 Person concerned**

Data subject is any identified or identifiable natural person whose personal data is processed by the controller responsible for the processing.

### **2.1.3 Processing**

Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### **2.1.4 Restriction of processing**

Restriction of processing is the marking of stored personal data with the aim of restricting its future processing.

### **2.1.5 Profiling**

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements.

### **2.1.6 Pseudonymization**

Pseudonymization is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

### **2.1.7 Controller and person responsible for processing**

Controller or controller responsible for the processing is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. Where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

### **2.1.8 Processor**

Processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

### **2.1.9 Receiver**

Recipient is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients.

### **2.1.10 Third**

Third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

### **2.1.11 Consent**

Consent is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

### **3. Collection of personal data when visiting our website**

#### **3.1 General**

If you only use our website for informational purposes, i.e. if you do not register or otherwise provide us with information, we only collect the personal data that your browser automatically transmits to our server. If you wish to view our website, we therefore collect the following data in this way, which is technically necessary for us and the purpose of which is to enable the website to be delivered to your computer, to display our website to you and to ensure stability and security:

- IP address
- Host name of the accessing computer
- Date and time of the server request
- Time zone difference to Greenwich Mean Time (GMT)
- Content of the request (specific page)
- Access status/HTTP status code
- Amount of data transferred in each case
- Website from which the request comes
- Browser type and browser version
- Operating system used
- Language and version of the browser software.

This data is stored in so-called server log files.

The legal basis for the processing in this regard is Art. 6 para. 1 sentence 1 lit. f GDPR. The legitimate interest lies in the delivery of the website to the user's computer and the proper display of the website.

The data is deleted as soon as it is no longer required to achieve the purpose for which it was collected. In the case of the collection of data for the provision of the website, this is the case when the respective session has ended.

The collection of this data for the provision of the website and the storage of the data in log files is absolutely necessary for the operation of the website. Consequently, the user has no option to object.

#### **3.2 Cookies**

In addition to the aforementioned data, cookies are stored on your computer when you use our website. Cookies are small text files that are stored on your hard disk - assigned to the browser you are using - and through which the body that sets the cookie (here

us) to certain information. Cookies cannot execute programs or transfer viruses to your computer. They serve the purpose of making the website more user-friendly and effective overall.

The legal basis for the processing of personal data using cookies is Art. 6 para. 1 sentence 1 lit. f GDPR.

The data will be deleted as soon as it is no longer required to achieve the purpose for which it was collected.

### **3.3 Objection and removal options for all services that use cookies**

**3.3.1** Cookies are stored on the user's computer and transmitted by it to our website. You therefore have full control over the use of cookies. You can deactivate or restrict the transmission of cookies by changing the settings in your Internet browser. You can delete cookies that have already been saved at any time. This can also be done automatically. If you deactivate cookies for our website, you may no longer be able to use all the functions of our website to their full extent.

**3.3.2** Below you will find links where you can find out how to manage and deactivate cookies for some of the most important browsers:

Mozilla Firefox:

<https://support.mozilla.org/de/kb/cookies-erlauben-und-ablehnen>

Internet Explorer:

<https://support.microsoft.com/de-de/help/17442/windows-internet-explorer-delete-manage-cookies>

Chrome

Browser:

<https://support.google.com/accounts/answer/61416?hl=de>

**3.3.3** We also offer you the option of opting out of the analysis process on our website. To do this, you must follow the corresponding link. In this way, another cookie is set on your computer, which signals our website the user's data.

not to be saved. However, if you delete the corresponding cookie from your computer in the meantime, you must set the opt-out cookie again.

#### **4. Further functions and offers of our website and related data processing**

**4.1** In addition to the option of using our website purely for information purposes, we offer other services that you can use if you are interested. To do so, you must generally provide additional personal data that we use to provide the service.

#### **4.2 Contact via e-mail and post**

On our website, we offer you the opportunity to contact us via an e-mail address provided by us. In this case, the personal data transmitted by you with the e-mail will be stored. In any case, this is your e-mail address. You can also contact us by post via our address. The data you send us by post will also be stored in this context. This includes, for example, your address.

When you contact us, the data you provide will be processed by us solely for the purpose of processing your contact. No data will be passed on to third parties in connection with this data processing.

If you send us an e-mail or contact us by post, the legal basis for processing is Art. 6 para. 1 sentence 1 lit. f GDPR. If the contact is aimed at the conclusion of a contract, the additional legal basis for processing is Art. 6 para. 1 sentence 1 lit. b GDPR.

We delete the data collected in this context when it is no longer required to achieve the purpose. For personal data sent by you by email or post, this is the case when the respective conversation has ended. The conversation is ended when it can be inferred from the circumstances that the matter in question has been conclusively clarified.

If you have contacted us by e-mail or post, you can object to the storage of your personal data. You can send your revocation or objection to the contact details given in section 1.2.

Please note that in such a case the conversation cannot be continued and must be terminated. We will then delete the data transmitted and stored in the course of establishing contact.

#### **4.3 Newsletter**

On our website, we offer you the opportunity to subscribe to a free newsletter. We would like to inform you about our current interesting offers.

The data is entered into the form and transmitted to us and stored. The data will not be passed on to third parties and will only be used to send the newsletter. As part of the registration process, we only ask for your e-mail address. The provision of further, separately marked data is voluntary and is used to address you personally. In addition to your IP address, the time of registration is also stored.

As part of the sending process, we will obtain your consent and refer you to this privacy policy.

We use the so-called double opt-in procedure to subscribe to our newsletter. This means that after you have registered, we will send you an e-mail to the e-mail address you have provided in which we ask you to confirm that you wish to receive the newsletter. If you do not confirm your registration within 24 hours, your information will be blocked and automatically deleted after one month. The purpose of this procedure is to be able to verify your registration and, if necessary, to clarify any possible misuse of your personal data.

The legal basis for the processing is Art. 6 para. 1 sentence 1 lit. a GDPR.

We delete the data as soon as it is no longer required to achieve the purpose for which it was collected. Your e-mail address will therefore be stored for as long as your subscription to the newsletter is active.

You can revoke your consent to the sending of the newsletter at any time and unsubscribe from the newsletter. You can declare your revocation by clicking on the link provided in every newsletter e-mail, by e-mail to [datenschutz@gbc-ag.de](mailto:datenschutz@gbc-ag.de) or by sending a message to the contact details given in the imprint.

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

**4.5** If our service providers or partners are based in a country outside the European Union, we will inform you of the consequences of this circumstance in the description of the offer.

## **5. Use of Matomo (formerly Piwik)**

**5.1** This website uses the web analysis service Matomo to analyze and regularly improve the use of our website. We are in the process of

We use the data obtained to compile information about the use of the individual components of our website. We can use the statistics obtained to improve our offer and make it more interesting for you as a user.

- 5.2 The legal basis for the use of Matomo is Art. 6 para. 1 sentence 1 lit. f GDPR.
- 5.3 Cookies (see section 3.2. for more details) are stored on your computer for this analysis. The information collected in this way is stored by the controller exclusively on its server in Germany. You can stop the analysis by deleting existing cookies and preventing the storage of cookies. If you prevent the storage of cookies, we would like to point out that you may not be able to use this website to its full extent. You can prevent the storage of cookies by changing the settings in your browser. You can prevent the use of Matomo by unchecking the following box to activate the opt-out plug-in: Matomo iFrame.
- 5.4 This website uses Matomo with the "AnonymizeIP" extension. As a result, IP addresses are shortened to 2 bytes for further processing, so that direct personal identification - in particular an assignment of the shortened IP address to the calling computer - can be ruled out. The IP address transmitted by your browser via Matomo is not merged with other data collected by us.
- 5.5 The Matomo program is an open source project. Information from the third-party provider on data protection can be found at <https://matomo.org/docs/privacy/>.
- 5.6 We delete the data as soon as it is no longer required for our recording purposes.

## 6. External hosting

- 6.1 This website is hosted by the external service provider online.net. The company behind it is ONLINE SAS, 8 rue de la ville l'Evêque, 75008 Paris, France.

Hosting is a service in which a web space provider makes storage space available on its server. Web space refers to storage space that is placed on a web server so that the homepage can be stored there and made accessible to the public. Provider means the provider, which in our case is online.net.



The personal data collected on this website is stored on the hoster's servers. This may include IP addresses, contact requests, meta and communication data, contact details, names, website accesses and other data generated via a website.

Our hoster will only process your data to the extent necessary to fulfill its performance obligations and follow our instructions with regard to this data.

- 6.2** The hoster is used for the purpose of fulfilling the contract with our potential and existing customers, Art. 6 para. 1 sentence 1 lit. b GDPR, and in the interest of a secure, fast and efficient provision of our online offer by a professional provider, Art. 6 para. 1 sentence 1 lit. f GDPR.

## **Rights of data subjects**

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

- 7.1** You have the following rights vis-à-vis us with regard to your personal data:

#### **7.1.1 Information**

You have the right to request information from us about the personal data we have stored about you. We will be happy to provide you with this information on request. Furthermore, we will be happy to inform you on request to which third parties your personal data has been transmitted.

#### **7.1.2 Confirmation**

You have the right to request confirmation from us as to whether personal data concerning you is being processed. If you wish to exercise this right of confirmation, you can contact one of our employees at any time.

#### **7.1.3 Correction**

You have the right to demand that we correct or complete your personal data. If you do not notify us accordingly, we will do so immediately if we become aware that the data we have stored is incorrect or incomplete.

#### **7.1.4 Deletion**

You have the right to demand that we delete the personal data stored by us. The possibility of an actual deletion depends on

We do so on the basis of whether the fulfillment of a legal obligation by us, such as compliance with statutory retention obligations and the assertion, exercise and defense of legal claims, makes this possible.

Statutory retention periods based on commercial and tax law provisions are up to 10 years. Limitation periods for claims are up to 30 years.

You have the right to demand that we restrict processing. This is particularly relevant if there are reasons preventing deletion. From this point on, your personal data will only be processed with your consent.

#### **7.1.5** Restriction of processing

You have the right to demand that we restrict processing. This is particularly relevant if there are reasons preventing deletion. From this point on, your personal data will only be processed with your consent.

#### **7.1.6** Information

If you have asserted the right to rectification, erasure or restriction of the data concerning you, we are obliged to notify all recipients to whom personal data concerning you have been disclosed of this rectification or erasure of the data or the restriction of the processing of the data, unless this proves impossible or involves a disproportionate effort. You also have the right to be informed about these recipients.

#### **7.1.7** Right to data portability

You have the right to request that we transfer your personal data to you or a third party in a structured, commonly used and machine-readable format.

#### **7.1.8** Automated decisions in individual cases incl. profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

However, this does not apply if the decision

- is necessary for the conclusion or performance of a contract between us and you, or

- is authorized by Union or Member State law to which we are subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or
- with your express consent.

If the decision is necessary for the conclusion or performance of a contract between us and you or if it is made with your express consent, GBC AG shall take appropriate measures to safeguard your rights and freedoms and legitimate interests, including at least the right to obtain the intervention of a person by the controller, to state his or her point of view and to challenge the decision.

If you wish to assert rights relating to automated decisions, you can contact one of our employees at any time.

#### **7.1.9** Objection to data processing

Insofar as we base the processing of your personal data on the balancing of interests, you can object to the processing. This is the case if, in particular, the processing is not necessary for the performance of a contract with you. When exercising such an objection, we ask you to explain the reasons why we should not process your personal data as we have done. In the event of your justified objection, we will examine the situation and either discontinue or adapt the data processing or point out to you our compelling reasons worthy of protection, on the basis of which we will continue the processing.

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

GBC AG  
Halderstrasse 27  
86150 Augsburg  
Phone: +49 (0) 821 / 241133-0  
Fax: +49 (0) 821 / 241133-30  
E-mail: [office@gbc-ag.de](mailto:office@gbc-ag.de)

#### **7.1.10** Revocation of consent

If you have given your consent to data processing, you have the right to withdraw your consent at any time. This affects

However, this does not affect the lawfulness of processing based on consent before its withdrawal. If you wish to exercise your right to withdraw consent, you can contact us free of charge using the following contact details:

GBC AG  
Halderstrasse 27  
86150 Augsburg  
Phone: +49 (0) 821 / 241133-0  
Fax: +49 (0) 821 / 241133-30  
E-mail: [office@gbc-ag.de](mailto:office@gbc-ag.de)

#### 7.1.11 Right of appeal

You also have the right to complain to a data protection supervisory authority about the processing of your personal data by us.

## Further information

### 8. No automated decision-making

8.1 We do not carry out automated decision-making within the meaning of Art. 22 GDPR.

### 9. SSL encryption

9.1 This site uses SSL encryption for security reasons and to protect the transmission of confidential content, such as orders or inquiries that you send to us as the site operator. You can recognize an encrypted connection by the fact that the address line of the browser changes from "http://" to "https://" and by the lock symbol in your browser line.

9.2 If SSL encryption is activated, the data you transmit to us cannot be read by third parties.

### 10. Data protection in the application process

10.1 We offer you the opportunity to apply to us (e.g. by e-mail or post).

If you send us an application, we will process your associated personal data (e.g. contact and communication data, application documents, notes taken during interviews, etc.) insofar as this is necessary for the decision on the establishment of an employment relationship. Your personal data will only be passed on within our company to persons who are involved in processing your application.

If the application is successful, the data you submit will be stored in our data processing systems for the purpose of implementing an employment relationship.

If we do not make you a job offer, you may have the option of being included in our applicant pool. If you are accepted, all documents and details from your application will be transferred to the applicant pool so that we can contact you in the event of suitable vacancies.

- 10.2** The legal basis in the case of contract initiation is Art. 6 para. 1 sentence 1 lit. b GDPR and - if you have given your consent - Art. 6 para. 1 sentence 1 lit. a GDPR.

If the application is successful, the data submitted by you will be stored in our data processing systems on the basis of Art. 6 para. 1 sentence 1 lit. b GDPR for the purpose of implementing the employment relationship.

Inclusion in the applicant pool takes place exclusively on the basis of your express consent pursuant to Art. 6 para. 1 sentence 1 lit. a GDPR.

- 10.3** Your personal application data is collected and processed for the specific purpose of filling vacancies within our company. The purpose of data collection is also to be able to carry out a lawful review of your application as part of the application process. For this purpose, we store all the data you provide to us as part of your application. Based on the data submitted as part of your application, we will check whether you can be invited to an interview as part of the selection process. Then, in the case of generally suitable applicants, we collect certain other personal data that is important for the selection decision. If you are considered for employment, you will be informed separately about the personal data to be collected as part of the recruitment process. Further storage also serves as evidence in the event of a legal dispute.

**10.4** If we are unable to make you a job offer, you reject a job offer or withdraw your application, we reserve the right to retain the data you have submitted on the basis of our legitimate interests, Art. 6 para. 1 sentence 1 lit. f GDPR, for up to six months from the end of the application process (rejection or withdrawal of the application). The data will then be deleted and the physical application documents destroyed. The retention serves in particular as evidence in the event of a legal dispute. If it is evident that the data will be required after the expiry of the 6-month period (e.g. due to an impending or pending legal dispute), deletion will only take place when the purpose for further storage no longer applies.

Longer storage may also take place if you have given your consent in accordance with Art. 6 para. 1 sentence 1 lit. a GDPR or if legal storage obligations prevent deletion.

Inclusion in the applicant pool takes place exclusively on the basis of consent pursuant to Art. 6 para. 1 sentence 1 lit. a GDPR. Giving consent is voluntary and is not related to the current application process. The data subject can withdraw their consent at any time. In this case, the data will be irrevocably deleted from the applicant pool, provided there are no legal grounds for retention.

The data from the applicant pool will be irrevocably deleted no later than two years after consent has been granted.

## **11. Duration of storage of personal data**

**11.1** The criterion for the duration of the storage of personal data is the respective statutory retention period. After this period has expired, the corresponding data is routinely deleted, provided that it is no longer required for contract fulfillment or contract initiation.

## **12. Routine deletion and blocking of personal data**

**12.1** We process and store personal data of the data subject only for the period necessary to achieve the purpose of storage or if this has been provided for by the European legislator or another legislator in laws or regulations to which the controller is subject. If the purpose of storage no longer applies

or if a storage period prescribed by the European legislator or another competent legislator expires, the personal data are routinely blocked or erased in accordance with the statutory provisions.

### **13. Transfer of personal data to third countries**

**13.1** The European General Data Protection Regulation (GDPR) has created a uniform legal basis for data protection in the European Union. Your personal data is therefore mainly collected and processed by companies to which the European General Data Protection Regulation applies.

**13.2** If we process data in a third country, i.e. a country outside the European Union (EU) or the European Economic Area (EEA), or if this is done in the context of the use of third-party services or the disclosure or transfer of data to third parties, this will only take place if it is done to fulfill our (pre-)contractual obligations, on the basis of your consent, due to a legal obligation or on the basis of our legitimate interests.

**13.3** Subject to legal or contractual permissions, we process or have the data processed in a third country only if the special requirements of Art. 44 ff. GDPR, i.e. the processing is carried out, for example, on the basis of special guarantees. This is the case, for example, if the European Commission has decided that a certain third country offers an adequate level of protection in the area of data protection or officially recognized special contractual obligations, so-called "standard contractual clauses", are observed. If, for example, an American company submits to the so-called "Privacy Shield", i.e. the data protection agreement between the USA and the European Union, the aforementioned requirements are currently met.

### **14. Transfer of data to third parties and processors**

**14.1** In principle, we only pass on data with your consent. If we forward data despite the absence of such consent, this is done on the basis of the aforementioned legal bases. This is the case, for example, when forwarding data to payment service providers for the purpose of contract fulfillment, to credit reference agencies for the purpose of age verification, to credit agencies for the purpose of data protection.

This is the case if the data is transferred to public authorities for the fulfillment of overriding legal obligations or due to a court order or due to a legal obligation to disclose for the purpose of criminal prosecution, to avert danger or to protect and enforce intellectual property rights.

**14.2** According to the above, the recipients of your personal data may be third parties and processors.

**14.3** If data is forwarded to a processor, this is done on the basis of an agreement on order processing and on the basis of Art. 28 GDPR. Processors must ensure that suitable technical and organizational measures are implemented in such a way that the processing of personal data is carried out in accordance with the requirements of the GDPR and the BDSG. The processor and any person subordinate to us or the processor who has access to personal data may only process this data on our instructions, unless they are obliged to do so under Union law or the law of the Member States. We select our processors carefully and check them at regular intervals

**15. Legal or contractual obligation to provide the personal data; Requirement necessary to enter into a contract; Obligation of the data subject to provide the personal data; possible consequences of failure to provide such data**

**15.1** We inform you that the provision of personal data is partly required by law (e.g. tax regulations) or can also result from contractual regulations (e.g. information on the contractual partner). Sometimes it may be necessary for a contract to be concluded for a data subject to provide us with personal data that must subsequently be processed by us. Failure to provide the personal data would mean that the contract with the data subject could not be concluded. Before personal data is provided by the data subject, the data subject can contact one of our employees. Our employee will inform the data subject on a case-by-case basis whether the provision of the personal data is required by law or contract or is necessary for the conclusion of the contract, whether there is an obligation to provide the personal data and what the consequences would be if the personal data were not provided.



**16. Changes to our privacy policy**

- 16.1** We reserve the right to adapt this privacy policy so that it always complies with current legal requirements or to implement changes to our services in the privacy policy, e.g. when introducing new services. The new privacy policy will then apply to your next visit.