

## **Privacy policy for our social media channels**

### **I. Preamble**

The protection of your personal data is of great importance and concern to us. The following provides information on how we handle data that are collected when you interact with our social media presence on social networks and platforms. Your data are processed in accordance with statutory requirements.

### **II. Provider**

#### **1. Facebook Fan Page**

##### **1.1 Responsible Body**

In the event that the data you provide us with are also or exclusively processed by Facebook, Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland is considered the controller or joint controller (with us) within the meaning of the General Data Protection Regulation (GDPR). To this end, we have signed an agreement with Facebook on shared responsibility for the processing of data (Controller Addendum) in accordance with Art. 26 GDPR. This agreement determines which data processing operations we or Facebook are responsible for when you visit our Facebook fan page. This agreement can be viewed at the following link:

[https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum).

If you, as a page visitor, wish to exercise your rights (access, rectification, erasure, restriction, data portability, complaint with a supervisory authority, objection/revocation), you can contact either us or Facebook. You can modify your advertising preferences in your user account. To do so, just click on the following link and log in: <https://www.facebook.com/settings?tab=ads> or <http://www.youonlinechoices.com>

Please refer to Facebook's Privacy Policy for additional information:

<https://www.facebook.com/about/privacy/>

## **1.2 Facebook Data Protection Officer**

To contact Facebook's Data Protection Officer, you can use the online contact form provided by Facebook at the following link

<https://www.facebook.com/help/contact/540977946302970>.

## **1.3 Data processing for statistical purposes using page insights**

Facebook provides so-called page insights for our Facebook fan page: <https://www.facebook.com/business/a/page/page-insights>. These are aggregated data that tell us how people interact with our page. Page insights may be based on personal data collected in connection with a visit to or an interaction of a user with our page and in connection with content provided. Please take note of the type of personal information you share with us through Facebook. Your information may be processed for market research and promotional purposes, even if you are not logged in to Facebook or do not have a Facebook account. For example, user profiles can be created on the basis of user behavior and the resulting interests of users. These user profiles can in turn be used, for example, to place advertisements within and outside of the platforms that presumably correspond to the interests of the users. This data collection takes place via cookies, which are stored on your end device. In addition, data that are independent of the devices used by users can also be stored in user profiles; in particular, if the users are members of the respective platforms and are logged in to them. The legal basis for the processing is [Art. 6 \(1\) lit. f GDPR](#). Our legitimate interest lies in the optimized presentation of our offer, effective information sharing and communication with customers and interested parties as well as in the targeted placement of advertisements. Please note that we have no influence on the data collection and further processing by Facebook. As a result, we cannot provide any information about the extent to which, where and for how long the data are stored by Facebook. Furthermore, we cannot make any statements about

the extent to which Facebook complies with existing deletion obligations, which evaluations and links are made by Facebook with the data and to whom the data are passed on by Facebook. If you wish to avoid the processing of your personal data by Facebook, please contact us by other means.

## **2. Other social media providers**

### **2.1 Responsible Body**

If your personal data are processed by one of the providers listed below, this provider is the data controller within the meaning of the GDPR. If you would like to exercise your data subject rights, we would like to point out that the most efficient way to do so is to contact the respective providers directly. They are the only ones with access to the data collected from you. Should you nevertheless require help, please do not hesitate to contact us at any time.

We have online presences on the social media platforms of the following providers:

1. YouTube, Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland
2. LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland
3. XING SE, Dammtorstraße 29-32, 20354 Hamburg, Germany

### **2.2 Data Protection Officer**

Information on how to contact the Data Protection Officers of the other social media providers can be found here:

1. LinkedIn Ireland Unlimited Company:  
<https://www.linkedin.com/help/linkedin/ask/TSO-DPO>
2. XING SE: [Datenschutzbeauftragter@xing.com](mailto:Datenschutzbeauftragter@xing.com)

To get in touch with YouTube's Data Protection Officer, please contact Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

### **III. General information on social media platforms by the ACCONSIS Group**

#### **1. Responsible Body**

Data controller within the meaning of the GDPR is the following entity, insofar as the data transmitted to us by you via one of the social media platforms are processed directly by us:

##### **Acconsis GmbH Wirtschaftsprüfungsgesellschaft**

Schloßschmidstraße 5, D-80639 München

Phone: +49 89 54 71 43

Fax: +49 89 54 71 45

00, [Info@acconsis.de](mailto:Info@acconsis.de)

##### **Managing Director:**

Stefan Herzer, Chartered Accountant, Tax Consultant, MBA

Wolfgang Stamnitz, Chartered Accountant, Tax Consultant

Dr. Andreas Hofner, Lawyer, Tax Consultant

##### **Acconsis GmbH Steuerberatungsgesellschaft**

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##### **Managing Director:**

Stefan Herzer, Chartered Accountant, Tax Consultant, MBA

Wolfgang Stamnitz, Chartered Accountant, Tax Consultant

Dr. Andreas Hofner, Lawyer, Tax Consultant

Dr. Christopher Arendt, Lawyer

Rolf Hackspiel, Tax Consultant

Tobias Hangl, Dipl.-Betriebswirt (FH), Tax Consultant

Renate-Carolin Hoser, Tax Consultant

Thomas Knopf, Dipl.-Kfm., Tax Consultant

Robert Niederberger, Tax Consultant

Jörn Rathjen, Tax Consultant

Rainer Schmidt-Raquet, Chartered Accountant, Tax Consultant

##### **Acconsis GmbH Rechtsanwaltsgesellschaft**

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[Info@acconsis.de](mailto:Info@acconsis.de)

##### **Managing Director:**

Dr. Andreas Hofner, Lawyer, Tax Consultant

Dr. Christopher Arendt, Lawyer

cf. also our [Legal Notice](#).

<https://www.acconsis.de>

## **2. Our Data Protection Officer**

If you have any concerns about data processing carried out by us as the responsible party, please contact our Data Protection Officer at the following contact details: [dsb@proprivacy.de](mailto:dsb@proprivacy.de)

## **3. General data processing on social media platforms**

### **3.1 Data processing for market research and advertising**

On the company side, personal data are usually processed for market research and advertising purposes. For this purpose, a cookie is set in your browser, which enables the respective provider to recognize you when you visit a website. The collected data can be used to create user profiles. Based on these, advertisements are placed within and outside of the platform that presumably correspond to your interests. Furthermore, data can also be stored in user profiles independently of the devices you use. This is regularly the case if you are a member of the respective platforms and are logged in to them.

### **3.2 Data processing when contacting us**

We ourselves collect personal data when you contact us, for example via a contact form or through a messenger service such as Facebook Messenger. Which data are collected depends on your details and the contact data you provide or release. These will be stored by us for the purpose of processing your inquiry and in the event of follow-up questions. Under no circumstances will this data be passed on to third parties without your consent. The legal basis for processing the data is our legitimate interest in responding to your inquiry pursuant to Art. 6 (1) lit. f GDPR and, if applicable, Art. 6 (1) lit. b GDPR if your inquiry is aimed at the conclusion of a contract. Your data will be deleted after your inquiry has been processed, provided that there are no statutory retention

periods. We assume a final processing if it can be inferred from the circumstances that the relevant facts have been conclusively clarified.

### **3.3 Data processing for contract execution**

If your contact via a social network or other platform is aimed at the conclusion of a contract for the delivery of goods or the provision of services with us, we process your data in order to be able to fulfill the contract, carry out pre-contractual measures or provide the desired services. The legal basis for the processing of your data in this case is Art. 6 (1) lit. b GDPR. Your data will be deleted when they are no longer required for the execution of the contract or if it is certain that the pre-contractual measures will not lead to the conclusion of a contract corresponding to the purpose of establishing contact. Please note, however, that even after conclusion of the contract it may be necessary to store personal data of our contractual partners in order to comply with legal or contractual obligations.

### **3.4 Data processing based on consent**

If you are asked by the respective platform providers to consent to the processing of your data for a specific purpose, the legal basis for the processing is Art. 6 (1) lit. a and Art. 7 GDPR. A granted consent can be revoked at any time with effect for the future.

## **IV. Data transfer and recipients**

Please note that when using social media platforms, data processing may take place outside the EU and the European Economic Area, so that the European level of data protection cannot be guaranteed. The mentioned social media providers based in the US are certified for the US-European data protection agreement "Privacy Shield," which guarantees compliance with the data protection level applicable in the EU.

We have no influence on the processing and handling of your personal data by the respective providers. We also do not have any information on this. For further information, please check the Privacy Policy of the respective provider:

1. YouTube/Google Privacy Policy:

<https://policies.google.com/privacy?hl=de&gl=de>, Opt-out:

<https://adssettings.google.com/authenticated>, Privacy Shield:

<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>

2. LinkedIn Privacy Policy: <https://www.linkedin.com/legal/privacy-policy>,

Opt-Out: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>, Privacy Shield:

<https://www.privacyshield.gov/participant?id=a2zt0000000LOUZAA0&status=Active>

3. XING Privacy Policy

<https://privacy.xing.com/de/privacypolicy>

## V. Your rights

In the following you will find information about the rights of data subjects vis-à-vis the controller under applicable data protection law. You have the right to: Request information about your personal data processed by us; Art. 15 GDPR. In particular, you may request information on the processing purposes, the category of personal data, the categories of recipients to whom your data has been or will be disclosed, the planned storage period, the existence of a right to rectification, erasure, restriction of processing or objection, the existence of a right to lodge a complaint, the origin of your data if they were not collected by us, as well as the existence of an automated decision-making process including profiling and, if applicable, meaningful information on its details.

Immediately request the correction of incorrect or incomplete personal data stored by us; Art. 16 GDPR.

Demand the deletion of your personal data stored by us, unless processing is necessary for the exercise of the right to freedom of expression and information, for the fulfillment of a legal obligation, for reasons of public interest or for the assertion, exercise or defense of legal claims; Art. 17 GDPR.

Demand the restriction of the processing of your personal data insofar as the accuracy of the data is disputed by you, the processing is unlawful but you refuse the deletion of the data and we no longer need them, but you need the data to assert, exercise or defend legal claims, or you have lodged an objection against the processing pursuant to Art. 21 GDPR; Art. 18 GDPR.

Receive your personal data which you have provided to us in a structured, common and machine-readable format or to request their transfer to another controller; Art. 20 GDPR.

Lodge a complaint with a supervisory authority pursuant Art. 77 GDPR. As a rule, you should contact the supervisory authority of the federal state in which our registered office is located (see above) or that of your habitual place of residence or work.

Revoke previously issued consent to the processing of data at any time with future effect; Art. 7 (3) GDPR. In the event of a revocation, we will immediately delete the data concerned provided that further processing cannot be based on a legal basis for processing without consent. The revocation of the consent does not affect the legality of the processing carried out on the basis of the consent up to the revocation.

### **Right to object**

**If your personal data are processed by us on the basis of legitimate interests pursuant to Art. 6 (1) lit. f GDPR, you have the right pursuant to Art. 21 GDPR to object to the processing of your personal data, to the extent that it is for reasons arising from your particular situation. Insofar as the objection is directed against the processing of personal data**

**for the purpose of direct marketing, you have a general right to object without the need to specify a particular situation.** If you wish to exercise your right of revocation or objection, simply send an e-mail to [info@acconsis.de](mailto:info@acconsis.de).

## **VI. Duration of storage**

The personal data collected by us will be deleted from our system when they are no longer required for the purposes specified at the time of collection or if you have exercised your right of revocation or objection. Statutory retention periods remain unaffected. We have no influence on the storage period of your data which are stored by the providers of social media for their own purposes. For further details, please contact them directly.