

Data Protection Information

Facebook Page ETO GRUPPE

Below, we are informing you about the mutual processing of your personal data by Facebook Ireland Limited (“Facebook” or “Facebook Ireland”, and by us, ETO GRUPPE Beteiligungen GmbH, when you use our Facebook page as well as about the data protection rights you have towards us.

Please check carefully which personal data you exchange and share with us via Facebook.

Information on our products and services can also be found on our website at www.etogruppe.com. In this case Facebook does not receive any information.

I. Processing of Personal Data by Us When Using Our Facebook Page

The data provided by you on our website such as comments, ratings, photos, likes or Tweets are published by the social network Facebook and at no time are used or processed by us for purposes other than those specified below. We process the data shared by you to our Facebook page by commenting and sharing, where applicable, and on the basis of which we communicate with you via the social network.

We reserve the right in this context to delete content where we deem it necessary. The legal basis for the processing of data in these cases is our legitimate interest in our public relations work and our product and corporate advertising pursuant to Art. 6 Sect. 1 Clause 1 lit. f GDPR. Where the objective of your contact inquiry is the conclusion of a contract or the implementation of pre-contractual measures, the additional legal foundation for the processing is Art. 6 Sect. 1 Clause 1 lit. b GDPR.

When you contact us via our Facebook page or send us inquiries, the data provided by you are used exclusively for processing and responding to the contact inquiry and the corresponding technical administration. The legal basis for the processing of the data is our legitimate interest in responding to the contact inquiry pursuant to Art. 6 Sect. 1 Clause 1 lit. b GDPR. The data processing in connection with your contact inquiry will be deleted by us from our systems after storage is no longer necessary or the processing will be restricted if statutory retention of records duties prevent deletion of the data. For the personal data from the contact inquiry, we assume that further storage is not necessary where it can be concluded from the circumstances that the facts of the case in question have been conclusively settled.

We may refer to alternative, secure communication channels for responding to your inquiries. If you wish to prevent Facebook from processing the personal data provided by you, please contact us in a different way, such as via the address specified in the legal notice.

Where you are not exercising your right to objection to the processing of your personal data on the basis of a weighing of interests, we will delete your data from our systems immediately after the aforementioned legitimate interests cease to exist or we will restrict the processing if there are legal obligations preventing erasure as defined by Art. 6 Sect. 1 Clause 1 lit. c GDPR.

II. Processing of Personal Data by the Operator of the Social Network

When you visit our Facebook page, Facebook processes your activities as “page insights”. Page insights are summarized statistics on the basis of which specific events are prepared. They are documented by the Facebook servers when users interact with the sites and the associated content. Events consist of diverse data points which may be personal data. Which data points i. a. are stored in the events is shown under https://www.facebook.com/legal/terms/page_controller_addendum by Facebook. As operators of the page, we have no access to this data; only to the summarized page insights. Events are exclusively determined by Facebook. We are unable to set up, change or influence them in any way. Which data points are actually recorded by Facebook depends on your activities when visiting our Facebook page.

Facebook uses cookies stored on your PC in order to generate events via your data points. When you are logged onto our Facebook page as a registered user of Facebook, there is a cookie with your Facebook user ID on your PC through which Facebook can identify that you visited our Facebook page and how you used it. If you want to prevent this you should log out of Facebook or deactivate the function “stay logged in”, delete the cookies on your device and close and re-start your browser.

Only few events can be generated if you are not logged in. As operators of the Facebook account, we are neither able to identify in which countries within or outside the EU, to what extent and for how long your data are stored by Facebook, nor whether and to what extent Facebook complies with any erasure duties in force or which assessments and associations are made using the data and to whom the data are forwarded.

Data Protection Information

Facebook Page ETO GRUPPE

In particular, we are unable to identify whether and to what extent Facebook, regardless of whether you as the user of the social network are registered or not, uses web tracking tools and uses your profile and behavior data in order to assess your habits, personal relationships or preferences, for example, or to what extent activities on our fan page are allocated to individual users. Neither are we informed if and to what extent data processed by Facebook from your visit to our website are being used by Facebook for its own purposes or if these are passed on to third parties. However, Facebook is responsible for ensuring the security of the data processing.

Information regarding data processing by Facebook and the possibilities for the management and erasure of the data processed by Facebook is provided in the privacy policy in the respective valid version at https://www.facebook.com/legal/terms/page_controller_addendum.

Information on data processing by Facebook and from the possibilities provided by Facebook for management and erasure of the data processed by Facebook can be found in the privacy policy of the provider in the respective applicable version at <https://www.facebook.com/privacy/explanation> and under the items "Privacy" and "Ad Choices" on the homepage of the social network.

III. Your Data Subject Rights

Where data are recorded for safeguarding our interests on the basis of Art. 6 Sect. 1 Clause 1 lit. f GDPR, you have the right to lodge a complaint against the processing at any time on grounds arising from the particular situation.

Pursuant to Art. 15 GDPR, you have the right to access the personal information stored about you as well as to rectification of wrong data or to erasure where one of the grounds specified in Art. 17 GDPR is given, e.g. where the data are no longer required for the purpose being pursued. Moreover, you have the right to restriction of the processing if one of the prerequisites specified under Art. 18 GDPR exists and in cases of Art. 20 GDPR, the right to data portability. Moreover, pursuant to Art. 22 GDPR, you have the right not to be subject to a decision based exclusively on automated processing including profiling which has a legal effect on you or otherwise significantly impairs you.

If you believe that the processing of the respective data violates the applicable data protection regulations, you have the right pursuant to Art. 77 GDPR to lodge a complaint with a supervisory body. The right to lodge a complaint can in particular be exercised in the member state in which you reside or the site of the alleged violation.

IV. Mutual Responsibility Pursuant to Art. 26 GDPR and Contact Data

Facebook as the operator of the website and ETO GRUPPE BETEILIGUNGEN GmbH are mutually responsible for the processing pursuant to Art. 26 GDPR. The mutual responsibility comprises the declarations listed below, in particular the generation of the events and their compilation in page insights provided to us. A corresponding agreement on mutual responsibility between Facebook and ETO GRUPPE BETEILIGUNGEN GmbH was defined. The details of the agreement have been recorded at

https://www.facebook.com/legal/terms/page_controller_addendum.

We process data as shown under I. Facebook records and processes data as described under II. You can assert your rights specified under III. at any time towards us as well as against Facebook Ireland Limited at any time provided that the data processing falls under the scope of application of the GDPR. Where you assert your rights towards us, you can contact us via mail at our office address in Hardtring 8, 78333 Stockach or by telephone at +49 7771 809-0. Our data protection officer can be contacted at the address above or at datenschutz@etogruppe.com.

We are obligated to forward your enquiry to Facebook Ireland. Facebook Ireland will inform you and ensure that your rights can be asserted (i.a. information duties Art. 12-13 GDPR, data subject rights Art. 15-22 GDPR and data security and reporting of data protection violations Art. 32-34 GDPR).

We have no control over how Facebook complies with its duties or takes its decisions. If you would like to contact Facebook Ireland directly, please contact Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland. You can contact the data protection representative online via the contact form on the pages of the social network at <https://www.facebook.com/help/contact/540977946302970>.

Notice on the Processing of Your Personal Data by Facebook

When using Facebook it is possible for Facebook Ireland to relay your data to a server of the parent company in the US and to process them there. The European Court of Justice regards the data protection standards in the US as deficient in relation to EU standards. The processing of your personal data in the US is associated with the

Data Protection Information

Facebook Page ETO GRUPPE



corresponding risks, such as secret access by US agencies for supervisory and monitoring purposes. If you would like to avoid data transfer in future, visit our website directly at www.etogruppe.com.