# Data Protection Information ETO GRUPPE LinkedIn



The following text will inform you how LinkedIn Ireland Unlimited Company ("LinkedIn") and we, the ETO GRUPPE, jointly process your personal data when you use our LinkedIn website and it will inform you about your data privacy rights with regard to us.

Please be careful which personal data you share with us via LinkedIn.

Please visit <u>www.etogruppe.com</u> to find out more about us, our offers and services. LinkedIn will not receive any information when you visit our website.

#### I. How we process your personal data when you use our LinkedIn website

The data you transmit when using our website, such as comments, ratings, likes, shares, tagging or @-mentions, are published by the social network LinkedIn and we never use or process them for purposes other than the following.

The purpose of data processing our LinkedIn presence is to provide information about our company, our services and job offers combined with the option for users to contact us directly. We process the data you enter on our LinkedIn website by commenting on and sharing them if necessary, and this is the basis we use to communicate with you via the social network. We reserve the right to delete content if we believe it necessary. In such instances, the legal basis for processing data is our legitimate interest in our public relations work and our product and company advertising in accordance with Art. 6 Para. 1 (1) lit.f GDPR.

If you contact us or send us inquiries via our LinkedIn presence, the data you provide will only be used to process and answer the contact request and the associated technical administration. The legal basis for processing the data is our legitimate interest in answering your contact request in accordance with Art. 6 Paragraph 1

(1) lit.f GDPR . If your contact request is to conclude a contract or to implement pre-contractual measures, the additional legal basis for processing is Art. 6 Para. 1 (1) lit. b GDPR or, in the case of an application or the initiation of an employment contract, Section 26 GDPR. We delete the data processed in connection with your contact request after it no longer needs to be stored, or we restrict its processing if statutory retention requirements prevent deletion. Regarding personal data from the contact request, we assume that no further storage is required if the circumstances indicate that the matter in question has been clarified.

If necessary, we will refer you to alternative, secure communication channels to answer your inquiries. If you would like to prevent LinkedIn from processing personal data, you have transmitted to us, please contact us in another way, for example, via the address stated in our legal notice.

If you do not exercise your right to object in accordance with Art. 21 GDPR to the processing of personal data relating to you on the basis of a balance of interests, we will delete your data immediately after the aforementioned legitimate interests no longer apply or we will restrict processing if there are legal obligations as defined in Art. 6 Para. 1 (1) lit. c GDPR that prevent deletion.

#### II. How the social network operator processes personal data

If you see advertisements that we have placed, visit our site, follow it or work with the website in any way, LinkedIn processes personal data in order to give us "page insights." In particular, LinkedIn processes data that you have made available to it, such as your company title, country, industry, length of service, company size and data on the employment status from the member's profile. In addition, LinkedIn processes information about how you interacted with your company page, e.g., whether you are a follower. This data helps us to be able to target advertising in the future.

The page insights made available to us are aggregated data and regardless of the status of a joint controller, LinkedIn will not provide us with any personal data of members in relation to page insights or enable you to link page insights to individual members.

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For us as the operator of the LinkedIn presence, it is not clear in which countries within or outside the EU, to what extent and for what duration the data is stored by LinkedIn, nor whether and to what extent LinkedIn complies with existing deletion obligations or which evaluations and links with the data and to whom the data is passed on. In particular, we cannot see whether or to what extent LinkedIn, regardless of whether you are logged in or registered as a user of the social network, uses web tracking tools and uses your profile and behavioral data, for example, to evaluate your habits, personal relationships or preferences, or to see to what extent activities on our site are assigned to individual users. We also do not know whether or to what extent LinkedIn uses processed data from viewers who visit our website for its own purposes or whether this data is passed on to third parties.

However, LinkedIn is responsible for ensuring the security of data processing. Please visit <u>https://legal.linkedin.com/pages-joint-controller-addendum</u> to see the appropriate technical and organizational measures LinkedIn uses to guarantee security when processing your data.

Please visit <u>https://de.linkedin.com/legal/privacy-policy</u> for the currently applicable version regarding information on LinkedIn data processing and the options LinkedIn offers; information on how LinkedIn processes, manages and deletes data is stated in the provider's data guidelines policy.

#### III. Your rights as a data subject

If data is collected to safeguard our legitimate interests as based on Art. 6 Para. 1 (1) f GDPR, you have the right to object to processing at any time for reasons that arise from your particular situation.

According to Art. 15 GDPR, you have the right to information about the personal data stored about you as well as to correction of incorrect data or to deletion, provided that one of the reasons stated in Art. 17 GDPR exists, e.g., if the data is no longer needed for the pursued purposes. You also have the right to restrict processing if one of the conditions specified in Art. 18 GDPR is met and, in the cases of Art. 20 GDPR, the right to data portability. According to Art. 22 GDPR, you also have the right not to be subject to a decision based solely on automated processing, including profiling, which legally affects you or which significantly affects you in a similar manner.

If you believe that the processing of data concerning you violates data protection provisions, you have the right, under Article 77 GDPR, to lodge a complaint with a supervisory authority. The right to lodge a complaint may in particular be enforced at a supervisory authority in the Member State in which you reside, or at the site of the alleged infringement.

#### IV. Joint responsibility according to Art. 26 GDPR and contact data

Both LinkedIn as the website master for www.linkedin.com and ETO GRUPPE TECHNOLOGIES GmbH are jointly responsible for processing in accordance with Art. 26 GDPR. This mutual responsibility is covered in the statements listed below, and especially includes generation of "page insights," which will be provided to us. A corresponding agreement regarding this mutual responsibility was defined between LinkedIn and ETO GRUPPE TECHNOLOGIES GmbH. Details regarding this agreement are stated in <u>Page Controller Addendum</u>.

We process data as shown under I; LinkedIn collects and processes data as described under II.

You can assert your rights listed under III against us or against LinkedIn Ireland Unlimited Company at any time, provided that the data processing falls within the scope of the GDPR.

If you do assert your rights in relationship to us, please direct paper correspondence to our address at Hardtring 8, 78333 Stockach or you can call us at +49 7771 8 19-0. Please go to <u>datenschutz@etogruppe.com</u> to reach our data privacy officers or write to the address above.

We are obligated to pass your request on to LinkedIn. LinkedIn will inform you and ensure that your rights can be enforced (including Information Obligations 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 LinkedIn fulfills its duties and implements decisions.

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If you would like to contact LinkedIn directly, please contact LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland. You can contact the data protection officer by using the contact form available online on the pages of the social network at <a href="https://www.linkedin.com/help/linkedin/ask/TSO-DPO">https://www.linkedin.com/help/linkedin/ask/TSO-DPO</a>.

There is also a data processing agreement between us and LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland, which you can access here: <u>https://legal.linkedin.com/dpa/DE.</u>

### Information regarding how LinkedIn processes your personal data

When using LinkedIn, the company may transmit your data to a parent company server in the USA and process it there. The European Court of Justice considers the level of data privacy in the USA to be insufficient compared to EU standards. Processing personal data in the USA is associated with corresponding risks, e.g., secret access by US authorities for control and monitoring purposes. Visit the following for more information:

https://www.linkedin.com/help/linkedin/answer/62533?trk=microsites-frontend\_legal\_privacy-policy&lang=de.

Visit our website at <u>www.etogruppe.com</u> if you would like to avoid any of your personal data being transmitted in the future.