

TTR GROUP – DATA PROTECTION POLICY



This data protection policy explains the type, scope and purpose of our processing of personal data (hereinafter referred to as “data”) on our website and all associated websites, functions and contents as well as external online activities, such as our social media profiles (hereinafter jointly referred to as “online services”). For clarification of terms used, such as “personal data” and “processing”, see the definitions in Article 4 of the General Data Protection Regulation (GDPR).

Who is the data controller?

Responsible party:

TTR Group GmbH
Dreieichstraße 59
60594 Frankfurt am Main, Germany
Phone: +49 69 96246 0
Email: datenschutz@ttr-group.de
Website: www.ttr-group.de

Data protection officer:

a.s.k. Datenschutz e.K.
Schulstraße 16a
91245 Simmelsdorf, Germany
Phone: +49 9155 26399 70
Email: extdsb@ask-datenschutz.de
Website: www.ask-datenschutz.de

Data protection authority:

Der Hessische Datenschutzbeauftragte
Gustav-Stresemann-Ring 1
65189 Wiesbaden, Germany
Phone: +49 611 1408 0
Email: poststelle@datenschutz.hessen.de
Website: www.datenschutz.hessen.de

What sources and data do we use?

We only process and store your personal data if you provide it to us voluntarily, e.g. in the context of an email inquiry, an inquiry via our contact form, or an application. The input or contact forms tell you the purpose of the data that is collected.

Categories of data processed:

- User data (e.g. name, address)
- Contact data (e.g. email address, phone numbers)

No special categories of data (Art. 9, para. 1 GDPR) are processed, unless such data is supplied by the user for processing, e.g. in online forms.

Categories of data subjects:

- Customers, potential customers, suppliers and business partners
- Visitors and users of our online services

In the following, all data subjects are referred to as "users".

Why do we process your data (purpose of the processing)?

The personal data that you provide via our website or by email will only be processed for correspondence with you and solely for the purpose for which you have made the data available to us:

- Customer relationship management
- Responding to contact inquiries and communicating with users
- Communicating with applicants

Who handles your data?

Your data is forwarded to the relevant department in our organization. Our employees are bound by confidentiality requirements. We also confirm that we will not pass on your personal data to third parties unless we are legally obliged to do so or you have given us your prior consent.

Status: May 2018

1. Applicable legal basis

In accordance with Art. 13 GDPR, we inform you about the legal basis for our data processing. Where the legal basis is not specifically mentioned in the data protection policy, the following applies: The legal basis for obtaining consent is Art. 6 para. 1(a) and Art. 7 GDPR; the legal basis for processing in order to provide our services, perform a contract, and respond to inquiries is Art. 6 para. 1(b) GDPR; the legal basis for processing for compliance with our legal obligations is Art. 6 para. 1(c) GDPR; and the legal basis for processing for the protection of our legitimate interests is Art. 6 para. 1(f) GDPR. In the event that the vital interests of the data subject or another natural person require the processing of personal data, Art. 6 para. 1(d) GDPR serves as the legal basis.

2. Changes and updates to the data protection policy

Please take the time to regularly update yourself about the contents of our data protection policy. We adapt this data protection policy whenever this is necessary as a result of changes to the data processing that we carry out. We will inform you of any changes that require action on your part (such as giving consent) or if any other individual notifications are necessary.

3. Security measures

- 3.1. We take appropriate technical and organizational measures to ensure a level of protection appropriate to the risk, in accordance with Article 32 GDPR, taking into account the state of the art, the costs of implementation and the nature, scope, circumstances and purposes of processing, as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons; the measures include in particular safeguarding the confidentiality, integrity and availability of data by controlling physical access to the data, as well as the relevant access, input, transmission, securing of availability, and its separation. We have also set up procedures to guarantee the exercise of data subject rights, deletion of data and response to data breaches. We already take the protection of personal data into account when developing and selecting hardware, software and procedures, in accordance with the principle of data protection by design and by default (Art. 25 GDPR).
- 3.2. Specific security measures include the encrypted transmission of data between your browser and our server.

4. Working with contract processors and third parties

- 4.1. In so far as we disclose data to other persons and companies (contract processors or third parties) within the scope of our processing, transmit data to them or

otherwise grant them access to the data, this only take place on the basis of a legal permission (e.g. if data has to be transmitted to third parties, such as payment service providers, in accordance with Art. 6 para. 1(b) GDPR in order to fulfill a contract) if you have consented, if a legal obligation provides for this, or on the basis of our legitimate interests (e.g. when using agents, web hosts, etc.).

- 4.2. In so far as we commission third parties to process data based on an “order processing contract”, this is done in accordance with Art. 28 GDPR.

5. Transfers of personal data to third countries

In so far as we process data in a third country (i.e. outside the European Union (EU) or the European Economic Area (EEA)) or if this occurs in the context of the use of third-party services or disclosure or transfer of data to third parties, this only takes place if it is done in order to fulfill our (pre)contractual obligations, on the basis of your consent, on the basis of a legal obligation, or on the basis of our legitimate interests. Subject to legal or contractual permissions, we only process or allow the data to be processed in a third country in compliance with the special requirements of Art. 44 ff. GDPR. This means, for example, processing is carried out on the basis of special guarantees, such as the officially recognized determination of a data protection level that meets the EU’s requirements (e.g. for the USA by the Privacy Shield) or compliance with officially recognized special contractual obligations (known as “standard contractual clauses”).

6. Rights of data subjects

- 6.1. You have the right to request confirmation of whether your data is being processed, and to request information about this data, additional information and a copy of the data in accordance with Art. 15 GDPR.
- 6.2. In accordance with Art. 16 GDPR you have the right to request that the data concerning you be completed or that incorrect data concerning you be rectified.
- 6.3. In accordance with Art. 17 GDPR, you have the right to demand that relevant data be erased immediately or, alternatively, to require that processing of your data be restricted in accordance with Art. 18 GDPR.
- 6.4. You have the right to receive the personal data you have provided to us in accordance with Art. 20 GDPR and to request its transmission to another controller.
- 6.5. In addition, in accordance with Art. 77 GDPR, you have the right to lodge a complaint with a supervisory authority.

7. Right to withdraw consent

You have the right to withdraw your consent at any time as stipulated in Art. 7 para. 3 GDPR.

8. Right to object

You have the right at any time to object to the future processing of your personal data in accordance with Art. 21 GDPR. You have the right to object at any time to your personal data being specifically used for the purposes of direct marketing.

9. Cookies and the right to object to processing for direct marketing purposes

We use temporary and permanent cookies, i.e. small files that are stored on the user's devices (for an explanation of the term and function, see last section of this data protection policy). In some cases, cookies are used for security purposes or are required to operate our online services (e.g. to display the website) or to save the user's decision when confirming the cookie banner. In addition, we or our technology partners use cookies to measure reach and for marketing purposes, about which users will be informed in the course of the data protection policy.

You can register a general objection to the use of cookies for the purposes of online marketing for a large number of services, in particular in the case of tracking, via the US website <http://www.aboutads.info/choices/> or the EU website <http://www.youronlinechoices.com/>. You can also prevent cookies being stored by adjusting your browser settings. Please be aware that doing so may mean you are unable to access all the functions of this website.

10. Erasure of data

10.1. The data that we process is erased or its processing restricted in accordance with Art. 17 and 18 GDPR. Unless expressly stated in this data protection policy, the data that we store is erased as soon as it is no longer required for its intended purpose and such erasure does not conflict with any statutory storage obligations. If the data is not erased because it is necessary for other and legally permissible purposes, its processing is restricted. This means the data is blocked and not processed for other purposes. For example, this applies to data that has to be retained for commercial or tax purposes.

10.2. In accordance with statutory requirements, data is kept in particular for 6 years in accordance with § 257 (1) of the German Commercial Code (commercial books, inventories, opening balance sheets, annual financial statements, commercial correspondence, accounting documents, etc.) and for 10 years in accordance with § 147 (1) of the German Tax Code (books, records, management reports, accounting documents, commercial and business correspondence, documents relevant for taxation, etc.).

11. Contacting us

11.1. Whenever we are contacted (via contact form or email), we process the user's details in order to process the contact request and handle it in accordance with Art. 6 para. 1(b) GDPR.

11.2. We delete the requests when they are no longer needed. We review the requirement every two years; requests from customers who have a customer account are stored permanently and the customer account details provide information about erasure. In the case of statutory archiving obligations, we erase the data when they expire (6 years under commercial law and 10 years under tax law).

12. Comments and contributions

12.1. If users leave comments or other contributions, their IP addresses are stored for 90 days on the basis of our legitimate interests within the meaning of Art. 6 para. 1(f) GDPR.

12.2. This is to protect ourselves in the event that a person's comments or other contributions are unlawful (insults, forbidden political propaganda, etc.). In this case we can be prosecuted for the comment or contribution, so we need to know the author's identity.

13. Collection of access data and log files

13.1. On the basis of our legitimate interests according to Art. 6 para. 1(f) GDPR, we collect data every time the server on which this service is located is accessed (known as server log files). Access data includes the name of the accessed website, file, date and time of access, transferred data volume, notification of successful access, browser type and version, the user's operating system, referrer URL (the previously visited page), IP address and the requesting provider.

13.2. Log file data is stored for security reasons (e.g. to investigate abuse or fraud) for no more than ninety days and then erased. Data that has to be stored for evidentiary purposes is not erased until the respective incident has been finally settled.

14. Social media presence

14.1. We maintain online presences in social networks and platforms in order to communicate with active customers, potential customers and users, and to inform them about our services. When accessing the respective networks and platforms, the terms and conditions and the data processing guidelines of their respective operators apply.

14.2. Unless otherwise stated in our data protection policy, we process the data of users who communicate with us within social networks and platforms, such as by posting or commenting on our social media sites or sending us messages.

15. Cookies and reach measurement

15.1. Cookies are pieces of data that are transferred from our web server or the web server of a third party to the user's web browser and stored there for later retrieval. Cookies may be small pieces of data or other types of stored information.

15.2. We use "session cookies", which are only stored on our online presence for the duration of your current visit (e.g. to save your login status or process the status of a questionnaire, and thus make it possible for you to use our online services). A session cookie stores a randomly generated unique identification number, known as a session ID. A cookie also contains information about its origin and the storage period. These cookies cannot store any other data. Session cookies are deleted when you have finished using our online services and log out or close your browser, for example.

15.3. Users are informed about the use of cookies in the context of pseudonymized range measurement within the scope of this data protection policy.

15.4. If users do not want cookies to be stored on their computer, they are asked to deactivate the corresponding option in their browser settings. Stored cookies can be deleted in your browser's settings. Deactivating the use of cookies may mean you cannot access all the functions of our online services.

15.5. You can opt out of the use of cookies for range measurement and advertising purposes via the deactivation page of the network advertising initiative (<http://optout.networkadvertising.org/>) and also the US website (<http://www.aboutads.info/choices>) or the European website (<http://www.youronlinechoices.com/uk/your-ad-choices/>).

16. Integration of third-party services and content

16.1. Within our online services, based on our legitimate interests (i.e. interest in the analysis, optimization and commercial operation of our online services within the meaning of Art. 6 para. 1(f) GDPR), we use the services of third parties in order to incorporate their content and services, such as videos or fonts (hereinafter jointly referred to as "content"). This always requires the third party providers of this content to have access to the user's IP address, as without this IP address they cannot send content to their browser. The user's IP address is therefore required in order to display this content. We make every effort to only use content from providers who use the IP address solely in order to deliver the content. Third-party providers may also use "pixel tags" (invisible graphics, also known as "web beacons") for statistical or marketing purposes. These pixel tags may be used to evaluate data such as visitor traffic to the pages of this website. The pseudonymized data may also be stored in cookies on the user's device and may

include technical information about the browser and operating system, referring websites, time of visit, and other information about the use of our online services, and may also be linked to such data from other sources.

16.2. Below is a list of third-party providers and their content, together with links to their data protection policies, which contain further information on data processing and, in some cases already mentioned here, opt-out possibilities:

- External fonts from Google, LLC., <https://www.google.com/fonts> (“Google Fonts”). Google Fonts are integrated by accessing a Google server (usually in the U.S.). Data protection policy: <https://policies.google.com/privacy>, opt-out: <https://adssettings.google.com/authenticated>.
- Maps from the Google Maps service provided by third-party provider Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Data protection policy: <https://www.google.com/policies/privacy/>, opt-out: <https://www.google.com/settings/ads/>.
- YouTube videos provided by third-party provider Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Data protection policy: <https://policies.google.com/privacy>, opt-out: <https://adssettings.google.com/authenticated>.
- External code of JavaScript “jQuery” framework provided by third-party provider jQuery Foundation, <https://jquery.org>