

Data Protection Policy

This document explains how we process your personal data (data) in KlettNET.

I. Who is responsible for processing your data, and whom can you contact in this regard?

Ernst Klett AG, Rotebühlstraße 77, 70178 Stuttgart, Germany
E-mail: info@klett-gruppe.de, Tel.: +49 (0)711 66720

If you have any questions regarding the protection of your data, please contact our data protection officer:

Ernst Klett AG (Attn: Data Protection Officer), Rotebühlstraße 77, 70178 Stuttgart, Germany

E-mail: b.spickenheier@klett-gruppe.de
Tel.: +49 (0)711 6672 1173

II. Processing of personal data

The use of your data is governed by the applicable legal provisions, in particular the General Data Protection Regulation (hereinafter: GDPR) and the Federal Data Protection Act (hereinafter: BDSG).

Insofar as no other additional legal basis is specified below, the legal basis is exclusively your consent, which you must provide when registering for KlettNET (Article 6 (1) (a) GDPR in conjunction with Section 26 (2) BDSG or, in the case of special categories of data, Article 9 (2) (a) GDPR in conjunction with Section 26 (2), (3) sentence 2 BDSG).

1. Registering with KlettNET

If you wish, you can register with KlettNET. To register, you must provide your name and surname, declare whether you are based in Germany (yes/no) and give your business e-mail address, which will serve as your user ID, and a password (access data) so that only you can log in. After registration, you will receive a confirmation e-mail from us with a link to confirm your e-mail address.

Registration with KlettNET is voluntary. If you do not register with KlettNET, you will not face any negative consequences. You are therefore under no legal or contractual obligation to provide your data. If you do not register with KlettNET, you will not be able to use the features of KlettNET.

2. Visiting klettnet.de

• Server log files

When you visit klettnet.de, we save, for a maximum of 3 months, your IP address and the date and time of your visit; information on your device's operating system and the browser you use, including your language settings; the address of the website from which you accessed klettnet.de (also known as a 'referrer URL'); the names of the files you access; and the amount of data transferred in the process. We receive this information from your Internet service provider.

For technical reasons, much of the data involved has to be saved in order to display klettnet.de on your computer or smartphone and to safeguard system security. It is also analysed in anonymised form for statistical purposes and to improve the quality of klettnet.de (see also section II, 2 c below). None of this data is linked to the personal data of any specific natural person.

This data is processed on the basis of Article 6 (1) (f) of the GDPR. We have a legitimate interest in ensuring the proper presentation of klettnet.de on your screen, our ability to swiftly address the causes of hacking attempts and other disruptions, and the means by which we analyse this anonymised data for statistical purposes. While the provision of said data is not stipulated by law or any contract, not processing the bulk of the data in question would make using klettnet.de impossible for related technical reasons.

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- **Cookies**

When you visit klettnet.de, session cookies are used. Cookies are small files that contain identification numbers assigned by our company. When you visit klettnet.de, cookies are stored on your computer or smartphone. If you access klettnet.de again during the same browser session, the identification number assigned makes it possible to recognise your device. Session cookies enable you to remain logged in to KlettNET even if you visit various other sites in the meantime. Session cookies are deleted when you close your browser.

We are permitted to set session cookies in accordance with Article 6 (1) (f) of the GDPR. We have an interest in making KlettNET a user-friendly experience, which includes enabling you to remain logged in to KlettNET even if you access other websites in the meantime. You can also visit klettnet.de without storing our cookies. There is no obligation to use cookies. While most browsers accept cookies automatically, you can configure yours to deny them or notify you before they are used. These settings must be configured separately for every browser and device you use. Information on how to deactivate cookies can typically be found through your browser's help function.

- **Generation of statistics through Matomo**

Our website uses the web analytics service Matomo. The purpose of Matomo is to log users' clicking and surfing behaviour on this website, which enables us to generate statistics on how the site is used. These statistics help us to improve our website. The data collected for this purpose is anonymised and not stored along with your other data. During this process, your IP address is anonymised as quickly as possible so that you remain unidentifiable to us as a user.

The storage of Matomo cookies and the use of this analytics tool take place on the basis of Article 6 (1) (f) of the GDPR. The website operator has a legitimate interest in anonymised analysis of user behaviour in order to optimise its website and its advertising. If you consent to this (e.g. by consenting to the storage of cookies), the data will be processed exclusively in accordance with Article 6 (1) (a) of the GDPR. You may withdraw your consent at any time. The information generated by the cookie about the use of this website will not be passed on to third parties. The cookies set by Matomo remain valid for up to 13 months. The corresponding data is stored for three months.

There is no obligation to allow the use of Matomo or permanent cookies. You can also use klettnet.de without Matomo or permanent cookies. You can also configure your browser to deny the use of cookies (see II. 2 b above), but doing so may prevent you from using all the features of this website.

- **Data recipients**

We transmit the data described above to the following processors, which process your data based solely on our directives and not for their own purposes:

Support and maintenance of www.klettnet.de:

MPM Corporate Communication Solutions

Media Process Management GmbH

Untere Zahlbacher Strasse 13

55131 Mainz, Germany

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Data centre

Dun & Bradstreet Deutschland GmbH
Robert-Bosch-Str. 1
64293 Darmstadt, Germany

System administration

COM+IT Consulting
Klosterstraße 168
67480 Endenkoben, Germany

Software development

Electronic Minds GmbH
Feldbergstr. 80
64293 Darmstadt, Germany

3. Newsletter

If you have subscribed to the Klett Group newsletter, we will process your business e-mail address for the purpose of sending you our newsletter on a regular basis.

The legal basis for sending the newsletter is Art. 6 (1) (f) GDPR. There is a legitimate interest in the exchange of information within the Klett Group. You can unsubscribe from the newsletter at any time; for example, by clicking on the unsubscribe link at the bottom of the newsletter or by opting to no longer receive the newsletter in your personal settings.

We also transmit the data to our processor CleverReach GmbH & Co. KG, CRASH Building, Schafjückenweg 2, 26180 Rastede, Germany, for the aforementioned purposes.

4. Use of KlettNET

What are the purposes and legal bases for processing your data in KlettNET?

We process the data, which you provide voluntarily, on the basis of your consent in KlettNET for the following purposes:

- Answering enquiries that you submit via the contact form.
- The internal publication of items on a virtual 'pinboard'
- Editing posts and deciding whether to publish a post on the virtual 'pinboard'

We may also process special categories of data that you have voluntarily posted or uploaded to KlettNET on the basis of your consent (information about your religion, political views, union affiliation or health, for example). We ask you not to publish such data in KlettNET.

We also process your data on the basis of Article 6 (1) (f) of the GDPR. There is a legitimate interest in the exchange of information within the Klett Group.

- Announcements of the Klett Group, provision of information material
- IT administration in KlettNET, administration of your user ID
- Facilitation of internal work processes for the purpose of planning and organising work
- The publication of your name in KlettNET if you perform overlapping activities for subsidiaries of Ernst Klett AG, such as being a first aider, a member of the medical service, the works council or the representative body for severely disabled persons, as an employee of a service company of Ernst Klett AG (Klett Zentrale Dienste GmbH, SKE Grundstücksverwaltungs GmbH), or as the author of an article.
- The publication of photographs of company events in KlettNET in which you are only casually seen.

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- The protection of our property, including IT systems
- The assertion and defence of legal claims

We may process your data for the purpose of investigating criminal offences on the basis of Article 88 GDPR in conjunction with Section 26 (1) sentence 2 BDSG.

What data is processed?

We process the following data pertaining to your person, which is posted on KlettNET by the Corporate Communications Department of Ernst Klett AG or published by you on the virtual 'pinboard':

- Name, first name, salutation, title
- E-mail address
- Company for which you work, role and position
- Photographs
- Other data that you publish on the virtual 'pinboard' or enter in the contact form

How long will your data be stored?

As long as you remain registered with KlettNET, will store the data you provide in KlettNET at least until you withdraw your consent.

We may also store data required for the assertion or defence of legal claims until the expiry of the statutory limitation periods, up to a maximum of 30 years, provided that a legal dispute is already pending at the time consent is withdrawn or the employment relationship terminated.

Will your data be passed on to third parties?

KlettNET is an information service for employees of the Klett Group. Therefore, all data that you publish on the virtual 'pinboard' can be viewed by employees of the companies listed below. The recipients of your data are therefore the companies listed under the following link and their employees:

<https://www.klett-gruppe.de/en/companies-locations/companies>

Please note that this service may transfer data outside the European Union and the European Economic Area and to a country that does not provide an adequate level of data protection. If the data is transferred to the US, there is a risk that your data may be processed by US authorities for control and monitoring purposes without you potentially having any legal recourse.

We may also share this data with the following recipients:

- Police for the purpose of investigating offences
- Courts involved in asserting or defending our rights

We also transfer this data to our processors mentioned above under II. 2. d.

What rights do you have as far as your information is concerned?

Pursuant to Article 15 of the GDPR, you have the right to request information about whether we process your data (and if so, which data). You can also ask that your data be corrected (and completed, if applicable) in accordance with Article 16 of the GDPR. The GDPR further grants you the right to have your data deleted (Article 17) or restricted (Article 18). In line with Article 21 of the GDPR, you are entitled to receive any of your data that has been transmitted to us based on your consent or a corresponding contract, provided that the processing in question is automated. If you prefer it and doing so is technically feasible, we will transmit this data to a third party.

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In cases in which we process data to preserve our interests on the sole basis of Article 6 (1) (f) of the GDPR, you have the right to object to the processing of your data for reasons pertaining to your particular situation. If you raise such an objection, we will no longer process the data in question unless we can prove that there is compelling justification for the continuation of said processing and it takes precedence over your interests, rights, and freedoms; or the processing is necessary to enforce valid legal claims.

If you have consented to the processing of your data, you have the right to withdraw your consent at any time. You will not face any negative consequences by doing so. Withdrawing your consent will not affect the legality of the processing performed up to that point. You can withdraw your consent by sending an e-mail to info@klett-gruppe.de. Once you withdraw your consent, your data will no longer be processed unless we are legally entitled or obligated to do so.

Finally, you have the right to lodge complaints regarding the applicable data protection laws, in particular with the Baden-Württemberg state representative for

data protection and freedom of information
(Landesbeauftragter für Datenschutz und
Informationsfreiheit

Lautenschlagerstr. 20

70173 Stuttgart, Germany).