

Privacy Policy

Preamble

With the following privacy policy we would like to inform you which types of your personal data (hereinafter also abbreviated as "data") we process for which purposes and in which scope. The privacy statement applies to all processing of personal data carried out by us, both in the context of providing our services and in particular on our websites, in mobile applications and within external online presences, such as our social media profiles (hereinafter collectively referred to as "online services").

The terms used are not gender-specific.

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Controller

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<https://www.werotex.swiss/impressum/>

Overview of processing operations

The following table summarises the types of data processed, the purposes for which they are processed and the concerned data subjects.

Categories of Processed Data

- Inventory data.
- Payment Data.
- Contact data.
- Content data.
- Contract data.
- Usage data.
- Meta, communication and process data.

Categories of Data Subjects

- Customers.
- Employees.
- Prospective customers.
- Communication partner.
- Users.
- Business and contractual partners.
- Persons depicted.

Purposes of Processing

- Provision of contractual services and fulfillment of contractual obligations.
- Contact requests and communication.
- Security measures.

- Direct marketing.
- Office and organisational procedures.
- Managing and responding to inquiries.
- Provision of our online services and usability.
- Information technology infrastructure.

Relevant legal bases

Relevant legal bases according to the GDPR: In the following, you will find an overview of the legal basis of the GDPR on which we base the processing of personal data. Please note that in addition to the provisions of the GDPR, national data protection provisions of your or our country of residence or domicile may apply. If, in addition, more specific legal bases are applicable in individual cases, we will inform you of these in the data protection declaration.

- **Consent (Article 6 (1) (a) GDPR)** - The data subject has given consent to the processing of his or her personal data for one or more specific purposes.
- **Performance of a contract and prior requests (Article 6 (1) (b) GDPR)** - Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- **Compliance with a legal obligation (Article 6 (1) (c) GDPR)** - Processing is necessary for compliance with a legal obligation to which the controller is subject.
- **Legitimate Interests (Article 6 (1) (f) GDPR)** - Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

Relevant legal basis according to the Swiss Data Protection Act: If you are located in Switzerland, we process your data based on the Federal Data Protection Act (abbreviated as "Swiss DPA"). This also applies if our processing of your data otherwise affects you in Switzerland and you are affected by the processing. The Swiss DPA does not generally provide that a legal basis for the processing of personal data must be stated (unlike, for example, the GDPR). We process personal data only when the processing is lawful, is conducted in good faith, and is proportionate (Article 6 (1) and (2) of the Swiss DPA). Furthermore, we only collect personal data for a specific purpose that is recognisable to the person concerned and process it only in a manner that is compatible with these purposes (Article 6 (3) of the Swiss DPA).

Reference to the applicability of the GDPR and the Swiss DPA: These privacy notices serve both to provide information in accordance with the Swiss Federal Act on Data Protection (Swiss DPA) and the General Data Protection Regulation (GDPR).

Rights of Data Subjects

Rights of the Data Subjects under the GDPR: As data subject, you are entitled to various rights under the GDPR, which arise in particular from Articles 15 to 21 of the GDPR:

- **Right to Object: You have the right, on grounds arising from your particular situation, to object at any time to the processing of your personal data which is based on letter (e) or (f) of Article 6(1) GDPR, including profiling based on those provisions. Where personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of the personal data concerning you for the purpose of such marketing, which includes profiling to the extent that it is related to such direct marketing.**
- **Right of withdrawal for consents:** You have the right to revoke consents at any time.
- **Right of access:** You have the right to request confirmation as to whether the data in question will be processed and to be informed of this data and to receive further information and a copy of the data in accordance with the provisions of the law.
- **Right to rectification:** You have the right, in accordance with the law, to request the completion of the data concerning you or the rectification of the incorrect data concerning you.
- **Right to Erasure and Right to Restriction of Processing:** In accordance with the statutory provisions, you have the right to demand that the relevant data be erased immediately or, alternatively, to demand that the processing of the data be restricted in accordance with the statutory provisions.
- **Right to data portability:** You have the right to receive data concerning you which you have provided to us in a structured, common and machine-readable format in accordance with the legal requirements, or to request its transmission to another controller.
- **Complaint to the supervisory authority:** In accordance with the law and without prejudice to any other administrative or judicial remedy, you also have the right to lodge a complaint with a data protection supervisory authority, in particular a supervisory authority in the Member State where you habitually reside, the supervisory authority of your place of work or the place of the alleged infringement, if you consider that the processing of personal data concerning you infringes the GDPR.

Rights of the data subjects under the Swiss DPA:

As the data subject, you have the following rights in accordance with the provisions of the Swiss DPA:

- **Right to information:** You have the right to request confirmation as to whether personal data concerning you are being processed, and to receive the information necessary for you to assert your rights under the Swiss DPA and to ensure transparent data processing.
- **Right to data release or transfer:** You have the right to request the release of your personal data, which you have provided to us, in a common electronic format, as well as its transfer to another data controller, provided this does not require disproportionate effort.
- **Right to rectification:** You have the right to request the rectification of inaccurate personal data concerning you.
- **Right to object, deletion, and destruction:** You have the right to object to the processing of your data, as well as to request that personal data concerning you be deleted or destroyed.

Use of Cookies

Cookies are small text files or other data records that store information on end devices and read information from the end devices. For example, to store the login status in a user account, the contents of a shopping cart in an e-shop, the contents accessed or the functions used. Cookies can also be used for various purposes, e.g. for purposes of functionality, security and convenience of online offers as well as the creation of analyses of visitor flows.

Information on consent: We use cookies in accordance with the statutory provisions. Therefore, we obtain prior consent from users, except when it is not required by law. In particular, consent is not required if the storage and reading of information, including cookies, is strictly necessary in order to provide an information society service explicitly requested by the subscriber or user. Essential cookies usually include cookies with functions related to the display and operability of the onlineservice, load balancing, security, storage of users' preferences and choices or similar purposes related to the provision of the main and secondary functions of the onlineservice requested by users. The revocable consent will be clearly communicated to the user and will contain the information on the respective cookie use.

Information on legal bases under data protection law: The legal basis under data protection law on which we process users' personal data with the use of cookies depends on whether we ask users for consent. If users consent, the legal basis for processing their data is their declared consent. Otherwise, the data processed with the help of cookies is processed on the basis of our legitimate interests (e.g. in a business operation of our online services and improvement of its usability) or, if this is done in the context of the fulfillment of our contractual obligations, if the use of cookies is necessary to fulfill our contractual obligations. For which purposes the cookies are processed by us, we do clarify in the course of this privacy policy or in the context of our consent and processing procedures.

Retention period: With regard to the retention period, a distinction is drawn between the following types of cookies:

- **Temporary cookies (also known as "session cookies"):** Temporary cookies are deleted at the latest after a user has left an online service and closed his or her end device (i.e. browser or mobile application).
- **Permanent cookies:** Permanent cookies remain stored even after the terminal device is closed. For example, the login status can be saved, or preferred content can be displayed directly when the user visits a website again. Likewise, user data collected with the help of cookies can be used for reach measurement. Unless we provide users with explicit information about the type and storage duration of cookies (e.g., as part of obtaining consent), users should assume that cookies are permanent and that the storage period can be up to two years.

General notes on revocation and objection (so-called "Opt-Out"): Users can revoke the consents they have given at any time and object to the processing in accordance with legal requirements. Users can restrict the use of cookies in their browser settings, among other options (although this may also limit the functionality of our online offering). An objection to the use of cookies for online marketing purposes can also be made through the websites <https://optout.aboutads.info> and <https://www.youronlinechoices.com/>.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Provision of our online services and usability.
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

Further information on processing methods, procedures and services used:

- **Cookie-Opt-Out:** In the footer of our website you will find a link that allows you to change your cookie settings as well as revoke corresponding consents; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

Business services

We process data of our contractual and business partners, e.g. customers and interested parties (collectively referred to as "contractual partners") within the context of contractual and comparable legal relationships as well as associated actions and communication with the contractual partners or pre-contractually, e.g. to answer inquiries.

We process this data in order to fulfill our contractual obligations. These include, in particular, the obligations to provide the agreed services, any update obligations and remedies in the event of warranty and other service disruptions. In addition, we process the data to protect our rights and for the purpose of administrative tasks associated with these obligations and company organization. Furthermore, we process the data on the basis of our legitimate interests in

proper and economical business management as well as security measures to protect our contractual partners and our business operations from misuse, endangerment of their data, secrets, information and rights (e.g. for the involvement of telecommunications, transport and other auxiliary services as well as subcontractors, banks, tax and legal advisors, payment service providers or tax authorities). Within the framework of applicable law, we only disclose the data of contractual partners to third parties to the extent that this is necessary for the aforementioned purposes or to fulfill legal obligations. Contractual partners will be informed about further forms of processing, e.g. for marketing purposes, within the scope of this privacy policy.

Which data are necessary for the aforementioned purposes, we inform the contracting partners before or in the context of the data collection, e.g. in online forms by special marking (e.g. colors), and/or symbols (e.g. asterisks or the like), or personally.

We delete the data after expiry of statutory warranty and comparable obligations, i.e. in principle after expiry of 4 years, unless the data is stored in a customer account or must be kept for legal reasons of archiving. The statutory retention period for documents relevant under tax law as well as for commercial books, inventories, opening balance sheets, annual financial statements, the instructions required to understand these documents and other organizational documents and accounting records is ten years and for received commercial and business letters and reproductions of sent commercial and business letters six years. The period begins at the end of the calendar year in which the last entry was made in the book, the inventory, the opening balance sheet, the annual financial statements or the management report was prepared, the commercial or business letter was received or sent, or the accounting document was created, furthermore the record was made or the other documents were created.

If we use third-party providers or platforms to provide our services, the terms and conditions and privacy policies of the respective third-party providers or platforms shall apply in the relationship between the users and the providers.

- **Processed data types:** Inventory data (e.g. names, addresses); Payment Data (e.g. bank details, invoices, payment history); Contact data (e.g. e-mail, telephone numbers); Contract data (e.g. contract object, duration, customer category); Usage data (e.g. websites visited, interest in content, access times). Meta, communication and process data (e.g. IP addresses, time information, identification numbers, consent status).
- **Data subjects:** Customers; Prospective customers. Business and contractual partners.
- **Purposes of Processing:** Provision of contractual services and fulfillment of contractual obligations; Security measures; Contact requests and communication; Office and organisational procedures. Managing and responding to inquiries.
- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR); Compliance with a legal obligation (Article 6 (1) (c) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).

Further information on processing methods, procedures and services used:

- **Customer Account:** Customers can create an account within our online offer (e.g. customer or user account, "customer account" for short). If the registration of a customer account is required, customers will be informed of this as well as of the details required for registration. The customer accounts are not public and cannot be indexed by search engines. In the course of registration and subsequent registration and use of the customer account, we store the IP addresses of the contractual partners along with the access times, in order to be able to prove the registration and prevent any misuse of the customer account. If the customer account has been terminated, the customer account data will be deleted after the termination date, unless it is retained for purposes other than provision in the customer account or must be retained for legal reasons (e.g. internal storage of customer data, order transactions or invoices). It is the customers' responsibility to back up their data when terminating the customer Account; **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR).
- **Online shop, order forms, e-commerce and delivery.:** We process the data of our customers in order to enable them to select, purchase or order the selected products, goods and related services, as well as their payment and delivery, or performance of other services. If necessary for the execution of an order, we use service providers, in particular postal, freight and shipping companies, in order to carry out the delivery or execution to our customers. For the processing of payment transactions we use the services of banks and payment service providers. The required details are identified as such in the course of the ordering or comparable purchasing process and include the details required for delivery, or other way of making the product available and invoicing as well as contact information in order to be able to hold any consultation; **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR).
- **Technical and Engineering services:** We process the data of our customers and clients (hereinafter uniformly referred to as "customers") in order to enable them to select, acquire or commission the selected services or works as well as associated activities and to pay for and make available such services or works or to perform such services or works.

The required information is indicated as such within the framework of the conclusion of the agreement, order or equivalent contract and includes the information required for the provision of services and invoicing as well as contact information in order to be able to hold any consultations. Insofar as we gain access to the information of end customers, employees or other persons, we process it in accordance with the legal and contractual requirements; **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR).

Provision of online services and web hosting

We process user data in order to be able to provide them with our online services. For this purpose, we process the IP address of the user, which is necessary to transmit the content and functions of our online services to the user's browser or terminal device.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times); Meta, communication and process data (e.g. IP addresses, time information, identification numbers, consent status). Content data (e.g. text input, photographs, videos).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Provision of our online services and usability. Information technology infrastructure (Operation and provision of information systems and technical devices, such as computers, servers, etc.).
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

Further information on processing methods, procedures and services used:

- **Provision of online offer on rented hosting space:** For the provision of our online services, we use storage space, computing capacity and software that we rent or otherwise obtain from a corresponding server provider (also referred to as a "web hoster"); **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).
- **Wordpress.com:** Hosting and software for the creation, provision and operation of websites, blogs and other online services; **Service provider:** Aut O'Mattic A8C Ireland Ltd., Grand Canal Dock, 25 Herbert Pl, Dublin, D02 AY86, Ireland; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://wordpress.com>; **Privacy Policy:** <https://automattic.com/privacy/>; **Data Processing Agreement:** <https://wordpress.com/support/data-processing-agreements/>. **Basis for third country transfer:** EU-US Data Privacy Framework (DPF).

Communication via Messenger

We use messenger services for communication purposes and therefore ask you to observe the following information regarding the functionality of the messenger services, encryption, use of the metadata of the communication and your objection options.

You can also contact us by alternative means, e.g. telephone or e-mail. Please use the contact options provided to you or use the contact options provided within our online services.

In the case of encryption of content (i.e. the content of your message and attachments), we point out that the communication content (i.e. the content of the message and attachments) is encrypted end-to-end. This means that the content of the messages is not visible, not even by the messenger service providers themselves. You should always use a current version of the messenger service with activated encryption, so that the encryption of the message contents is guaranteed.

However, we would like to point out to our communication partners that although messenger service providers do not see the content, they can find out that and when communication partners communicate with us and process technical information on the communication partner's device used and, depending on the settings of their device, also location information (so-called metadata).

Information on Legal basis: If we ask communication partners for permission before communicating with them via messenger services, the legal basis of our processing of their data is their consent. Otherwise, if we do not request consent and you contact us, for example, voluntarily, we use messenger services in our dealings with our contractual partners and as part of the contract initiation process as a contractual measure and in the case of other interested parties and communication partners on the basis of our legitimate interests in fast and efficient communication and meeting the needs of our communication partners for communication via messenger services. We would also like to point out that we do not transmit the contact data provided to us to the messenger service providers for the first time without your consent.

Withdrawal, objection and deletion: You can withdraw your consent or object to communication with us via messenger services at any time. In the case of communication via messenger services, we delete the messages in accordance with our general data retention policy (i.e. as described above after the end of contractual relationships, archiving requirements, etc.) and otherwise as soon as we can assume that we have answered any information provided by the communication partners, if no reference to a previous conversation is to be expected and there are no legal obligations to store the messages to prevent their deletion.

Reservation of reference to other means of communication: Finally, we would like to point out that we reserve the right, for reasons of your safety, not to answer inquiries about messenger services. This is the case if, for example, internal contractual matters require special secrecy or if an answer via the messenger services does not meet the formal requirements. In such cases we refer you to more appropriate communication channels.

- **Processed data types:** Contact data (e.g. e-mail, telephone numbers); Usage data (e.g. websites visited, interest in content, access times). Meta, communication and process data (e.g. IP addresses, time information, identification numbers, consent status).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of Processing:** Contact requests and communication. Direct marketing (e.g. by e-mail or postal).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).

Further information on processing methods, procedures and services used:

- **WhatsApp:** WhatsApp Messenger with end-to-end encryption; **Service provider:** WhatsApp Ireland Limited, 4 Grand Canal Quay, Dublin 2, D02 KH28, Ireland; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.whatsapp.com/>; **Privacy Policy:** <https://www.whatsapp.com/legal>. **Basis for third country transfer:** EU-US Data Privacy Framework (DPF).

Video Conferences, Online Meetings, Webinars and Screen-Sharing

We use platforms and applications of other providers (hereinafter referred to as "Conference Platforms") for the purpose of conducting video and audio conferences, webinars and other types of video and audio meetings (hereinafter collectively referred to as "Conference"). When using the Conference Platforms and their services, we comply with the legal requirements.

Data processed by Conference Platforms: In the course of participation in a Conference, the Data of the participants listed below are processed. The scope of the processing depends, on the one hand, on which data is requested in the context of a specific Conference (e.g., provision of access data or clear names) and which optional information is provided by the participants. In addition to processing for the purpose of conducting the conference, participants' Data may also be processed by the Conference Platforms for security purposes or service optimization. The processed Data includes personal information (first name, last name), contact information (e-mail address, telephone number), access data (access codes or passwords), profile pictures, information on professional position/function, the IP address of the internet access, information on the participants' end devices, their operating system, the browser and its technical and linguistic settings, information on the content-related communication processes, i.e. entries in chats and audio and video data, as well as the use of other available functions (e.g. surveys). The content of communications is encrypted to the extent technically provided by the conference providers. If participants are registered as users with the Conference Platforms, then further data may be processed in accordance with the agreement with the respective Conference Provider.

Logging and recording: If text entries, participation results (e.g. from surveys) as well as video or audio recordings are recorded, this will be transparently communicated to the participants in advance and they will be asked - if necessary - for their consent.

Data protection measures of the participants: Please refer to the data privacy information of the Conference Platforms for details on the processing of your data and select the optimum security and data privacy settings for you within the framework of the settings of the conference platforms. Furthermore, please ensure data and privacy protection in the background of your recording for the duration of a Conference (e.g., by notifying roommates, locking doors, and using the background masking function, if technically possible). Links to the conference rooms as well as access data, should not be passed on to unauthorized third parties.

Notes on legal bases: Insofar as, in addition to the Conference Platforms, we also process users' data and ask users for their consent to use contents from the Conferences or certain functions (e.g. consent to a recording of Conferences), the legal basis of the processing is this consent. Furthermore, our processing may be necessary for the fulfillment of our contractual obligations (e.g. in participant lists, in the case of reprocessing of Conference results, etc.). Otherwise, user data is processed on the basis of our legitimate interests in efficient and secure communication with our communication partners.

- **Processed data types:** Inventory data (e.g. names, addresses); Contact data (e.g. e-mail, telephone numbers); Content data (e.g. text input, photographs, videos); Usage data (e.g. websites visited, interest in content, access times). Meta, communication and process data (e.g. IP addresses, time information, identification numbers, consent status).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.); Users (e.g. website visitors, users of online services). Persons depicted.
- **Purposes of Processing:** Provision of contractual services and fulfillment of contractual obligations; Contact requests and communication. Office and organisational procedures.
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

Further information on processing methods, procedures and services used:

- **Microsoft Teams:** Conference and communication software; **Service provider:** Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, D18 P521, Ireland; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.microsoft.com/de-de/microsoft-365>; **Privacy Policy:** <https://privacy.microsoft.com/de-de/privacystatement>, Security information: <https://www.microsoft.com/de-de/trustcenter>. **Basis for third country transfer:** EU-US Data Privacy Framework (DPF), Standard Contractual Clauses (<https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA>).
- **TeamViewer:** Conference and communication software; **Service provider:** TeamViewer GmbH, Jahnstr. 30, 73037 Göppingen, Germany; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.teamviewer.com/en/>. **Privacy Policy:** <https://www.teamviewer.com/en/privacy-notice/>.
- **Zoom:** Conference and communication software; **Service provider:** Zoom Video Communications, Inc., 55 Almaden Blvd., Suite 600, San Jose, CA 95113, USA; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR);

Website: <https://zoom.us>; **Privacy Policy:** <https://zoom.us/docs/de-de/privacy-and-legal.html>; **Data Processing Agreement:** <https://zoom.us/docs/de-de/privacy-and-legal.html> (referred to as Global DPA). **Basis for third country transfer:** EU-US Data Privacy Framework (DPF), Standard Contractual Clauses (<https://zoom.us/docs/de-de/privacy-and-legal.html> (referred to as Global DPA)).

Cloud Services

We use Internet-accessible software services (so-called "cloud services", also referred to as "Software as a Service") provided on the servers of its providers for the storage and management of content (e.g. document storage and management, exchange of documents, content and information with certain recipients or publication of content and information).

Within this framework, personal data may be processed and stored on the provider's servers insofar as this data is part of communication processes with us or is otherwise processed by us in accordance with this privacy policy. This data may include in particular master data and contact data of data subjects, data on processes, contracts, other proceedings and their contents. Cloud service providers also process usage data and metadata that they use for security and service optimization purposes.

If we use cloud services to provide documents and content to other users or publicly accessible websites, forms, etc., providers may store cookies on users' devices for web analysis or to remember user settings (e.g. in the case of media control).

- **Processed data types:** Inventory data (e.g. names, addresses); Contact data (e.g. e-mail, telephone numbers); Content data (e.g. text input, photographs, videos); Usage data (e.g. websites visited, interest in content, access times). Meta, communication and process data (e.g. IP addresses, time information, identification numbers, consent status).
- **Data subjects:** Customers; Employees (e.g. Employees, job applicants); Prospective customers. Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of Processing:** Office and organisational procedures. Information technology infrastructure (Operation and provision of information systems and technical devices, such as computers, servers, etc.).
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

Further information on processing methods, procedures and services used:

- **Google Cloud Storage:** Cloud storage, cloud infrastructure services and cloud-based application software; **Service provider:** Google Cloud EMEA Limited, 70 Sir John Rogerson's Quay, Dublin 2, Ireland; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://cloud.google.com/>; **Privacy Policy:** <https://policies.google.com/privacy>; **Data Processing Agreement:** <https://cloud.google.com/terms/data-processing-addendum>; **Basis for third country transfer:** EU-US Data Privacy Framework (DPF), Standard Contractual Clauses (<https://cloud.google.com/terms/eu-model-contract-clause>). **Further Information:** <https://cloud.google.com/privacy>.
- **Microsoft Cloud Services:** Cloud storage, cloud infrastructure services and cloud-based application software; **Service provider:** Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, D18 P521, Ireland; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://microsoft.com>; **Privacy Policy:** <https://privacy.microsoft.com/de-de/privacystatement>, Security information: <https://www.microsoft.com/de-de/trustcenter>; **Data Processing Agreement:** <https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA>. **Basis for third country transfer:** EU-US Data Privacy Framework (DPF), Standard Contractual Clauses (<https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA>).

Commercial communication by E-Mail, Postal Mail, Fax or Telephone

We process personal data for the purposes of promotional communication, which may be carried out via various channels, such as e-mail, telephone, post or fax, in accordance with the legal requirements.

The recipients have the right to withdraw their consent at any time or to object to the advertising communication at any time.

After revocation or objection, we store the data required to prove the past authorization to contact or send up to three years from the end of the year of revocation or objection on the basis of our legitimate interests. The processing of this data is limited to the purpose of a possible defense against claims. Based on the legitimate interest to permanently observe the revocation, respectively objection of the users, we further store the data necessary to avoid a renewed contact (e.g. depending on the communication channel, the e-mail address, telephone number, name).

- **Processed data types:** Inventory data (e.g. names, addresses). Contact data (e.g. e-mail, telephone numbers).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of Processing:** Direct marketing (e.g. by e-mail or postal).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).