

# Data Protection Declaration

## 1. Introduction

With the following information we would like to give you as a "person concerned" an overview of the processing of your personal data by us and your rights under data protection laws. In principle, it is possible to use our web pages without entering personal data. However, if you wish to make use of special services of our company via our website, it may be necessary to process personal data. If the processing of personal data is necessary and there is no legal basis for such processing, we will generally obtain your consent.

The processing of personal data, for example your name, address or e-mail address, always takes place in accordance with the General Data Protection Regulation (GDPR) and in accordance with the country-specific data protection regulations applicable to "Siteco GmbH". By means of this data protection declaration, we would like to inform you about the scope and purpose of the personal data collected, used and processed by us.

As data controllers, we have implemented numerous technical and organisational measures to ensure the most complete possible protection of the personal data processed via this website. Nevertheless, web-based data transmissions can in principle have security gaps, so that absolute protection cannot be guaranteed. For this reason, you are also free to transmit personal data to us by alternative means, for example by telephone or post.

## 2. Responsibilities

Responsible in the sense of the GDPR is:

Siteco GmbH

Georg-Simon-Ohm-Straße 50, 83295 Traunreut, Germany

Phone: +49 8669 33-0

Fax: +49 8669 33-397

E-mail: [info@siteco.de](mailto:info@siteco.de)

Representative of the person responsible: Jesko von Stechow

## 3. Data protection commissioner

You can reach the data protection officer as follows:

Lothar Becker

Phone: +49 (0)8061 495743

Fax: +49 (0)8061 495744

E-mail: [lothar.becker@datenschutz-it.de](mailto:lothar.becker@datenschutz-it.de)

You can contact our data protection officer directly at any time if you have any questions or suggestions regarding data protection.

## 4. Technology

### 4.1 SSL/TLS encryption

This site uses SSL or TLS encryption to ensure the security of data processing and to protect the transmission of confidential content, such as orders, login data or contact requests that you send to us as the operator. You can recognize an encrypted connection by the fact that in the address line of the browser instead of a "http://" there is a "https://" and on the lock symbol in your browser line.

If SSL or TLS encryption is activated, the data that you transmit to us cannot be read by third parties.

### 4.2 Data acquisition when visiting the website

When using our website for information purposes only, i.e. if you do not register or otherwise provide us with information, we only collect data that your browser transmits to our server (in so-called "server log files"). Our website collects a range of general data and information each time a page is accessed by you or an automated system. This general data and information is stored in the log files of the server. The following can be recorded:

1. browser types and versions used,
2. the operating system used by the accessing system,
3. the Internet page from which an accessing system accesses our Internet page (so-called referrer),
4. the subwebsites, which are accessed via an accessing system on our website,
5. the date and time of access to the website,
6. an Internet protocol address (IP address),
7. the Internet service provider of the accessing system.

When using this general data and information, we do not draw any conclusions about your person. Rather, this information is required in order to:

1. to deliver the content of our website correctly,
2. to optimise the content of our website and the advertising for it,
3. to guarantee the permanent functionality of our IT systems and the technology of our website and
4. to provide law enforcement authorities with the information necessary for prosecution in the event of a cyber attack.

This collected data and information is therefore evaluated by us both statistically and with the aim of increasing data protection and data security in our company in order to ultimately ensure an optimum level of protection for the personal data processed by us. The data in the server log files are stored separately from all personal data provided by a data subject.

The legal basis for data processing is Art. 6 Para. 1 S. 1 lit. f GDPR. Our justified interest follows from the purposes listed above for data collection.

## **5. Disclosure of data to third parties**

Your personal data will not be transferred to third parties for purposes other than those listed below.

We will only pass on your personal data to third parties if:

1. you have given your express consent in accordance with Art. 6 Para. 1 S. 1 lit. a GDPR,
2. the disclosure in accordance with Art. 6 Para. 1 S. 1 lit. f GDPR to protect our legitimate interests is permissible and there is no reason to believe that you have a predominant legitimate interest in the non-disclosure of your data,
3. you have given your express consent in accordance with Art. 6 Para. 1 S. 1 lit. a GDPR,
4. in the event that there is a legal obligation to disclose your data pursuant to Art. 6 para. 1 sentence 1 lit. c GDPR, as well as
5. this is legally permissible and required pursuant to Art. 6 para. 1 sentence 1 lit. b GDPR for the execution of contractual relationships with you.

## **6. cookies**

### **General information about cookies**

We use cookies on our website. These are small files that your browser automatically creates and that are stored on your IT system (laptop, tablet, smartphone, etc.) when you visit our site. Cookies do not damage your end device, do not contain viruses, Trojans or other malware.

Information is stored in the cookie, which results in each case in connection with the specifically used terminal device. This does not mean, however, that we will be directly informed of your identity.

The use of cookies serves on the one hand to make the use of our offer more pleasant for you. For example, we use so-called session cookies to recognize that you have already visited individual pages on our website. These are automatically deleted after leaving our site.

In addition, we also use temporary cookies to optimize user friendliness, which are stored on your end device for a specified period of time. If you visit our site again to make use of our services, it is automatically recognized that you have already been with us and which inputs and settings you have made so that you do not have to enter them again.

On the other hand, we use cookies in order to statistically record the use of our website and to evaluate it for the purpose of optimising our offer for you. These cookies enable us to automatically recognise that you have already visited our site when you visit it again. These cookies are automatically deleted after a defined period of time.

The data processed by cookies are necessary for the purposes mentioned to safeguard our legitimate interests and those of third parties pursuant to Art. 6 Para. 1 S. 1 lit. f GDPR.

Most browsers accept cookies automatically. However, you can configure your browser so that no cookies are stored on your computer or a message always appears before a new cookie is created. Complete deactivation of cookies can, however, mean that you cannot use all the functions of our website.

## **7. contents of our website**

### **7.1 Registration as User**

You have the option of registering on our website by providing personal data. The personal data transmitted to us in the process results from the respective input mask used for registration. The personal data you enter is collected and stored exclusively for our internal use and for our own purposes. We may arrange for the data to be passed on to one or more contract processors, for example a parcel service provider, who also uses the personal data exclusively for internal use attributable to us.

By registering on our website, the IP address assigned by your Internet Service Provider (ISP), the date and time of registration are also saved. These data are stored against the background that this is the only way to prevent misuse of our services and, if necessary, to enable criminal offences to be investigated. In this respect, the storage of this data is necessary for our security. These data will not be passed on to third parties unless there is a legal obligation to do so or the data is used for criminal prosecution purposes.

Your registration with voluntary indication of personal data also serves us to offer you contents or services which, due to the nature of the matter, can only be offered to registered users. Registered persons are free to modify the personal data provided during registration at any time or to have it completely deleted from our database.

We will provide you at any time on request with information about which personal data about you is stored. Furthermore, we will correct or delete personal data at your request, provided there are no legal storage obligations to the contrary. A data protection officer named in this data protection declaration and all other employees are available to the person concerned as contact persons in this context.

The processing of your data is carried out in the interest of a comfortable and simple use of our website. This constitutes a legitimate interest within the meaning of Art. 6 para. 1 lit. f GDPR.

### **7.2 Contact us / Contact form**

Personal data is collected within the scope of contacting us (e.g. via contact form or e-mail). Which data is collected in the case of a contact form, is apparent from the respective contact form. These data are stored and used exclusively for the purpose of answering your request or for establishing contact and the associated technical administration. The legal basis for processing the data is our legitimate interest in responding to your request pursuant to Art. 6 para. 1 lit. f GDPR. If the purpose of your contact is to conclude a contract, the additional legal basis for the processing is Art. 6 para. 1 lit. b GDPR. Your data will be deleted after final processing of your

enquiry; this is the case if it can be inferred from the circumstances that the matter in question has been conclusively clarified and provided there are no legal obligations to retain data to the contrary.

### **7.3 Application management / Job exchange**

We collect and process the personal data of applicants for the purpose of processing the application procedure. The processing can also be carried out electronically. This is particularly the case if an applicant submits corresponding application documents to us electronically, for example by e-mail or via a web form on the website. If we conclude an employment contract with an applicant, the data transmitted will be stored for the purpose of processing the employment relationship in compliance with the statutory provisions. If we do not conclude an employment contract with the applicant, the application documents will be automatically deleted two months after notification of the rejection decision, provided that no other legitimate interests on our part are opposed to deletion. Other legitimate interests in this sense are, for example, a duty of proof in proceedings under the General Equal Treatment Act (AGG).

In this respect, data processing is carried out solely on the basis of our legitimate interest pursuant to Art. 6 Para. 1 lit. f GDPR.

## **8. newsletter delivery**

### **Advertising newsletter**

On our website you have the possibility to subscribe to the newsletter of our company. Which personal data is transmitted to us when ordering the newsletter results from the input mask used for this purpose.

We inform our customers and business partners about our offers at regular intervals by means of a newsletter. The newsletter of our company can only be received by you if

1. you have a valid e-mail address and
2. you have registered for the newsletter.

For legal reasons, a confirmation e-mail in the double opt-in procedure will be sent to the e-mail address you entered for the first time for the newsletter dispatch. This confirmation e-mail is used to check whether you as the owner of the e-mail address have authorised the receipt of the newsletter.

When registering for the newsletter, we also store the IP address of the IT system you used at the time of registration, as well as the date and time of registration, assigned by your Internet Service Provider (ISP). The collection of this data is necessary in order to trace the (possible) misuse of your e-mail address at a later point in time and therefore serves our legal security.

The personal data collected during registration for the newsletter will be used exclusively to send our newsletter. Furthermore, subscribers to the newsletter may be informed by e-mail if this is necessary for the operation of the newsletter service or registration in this respect, as might be the case in the event of changes to the

newsletter offering or changes to the technical conditions. The personal data collected as part of the newsletter service will not be passed on to third parties. You may cancel your subscription to our newsletter at any time. The consent to the storage of personal data that you have given us for the newsletter can be revoked at any time. For the purpose of revoking your consent, you will find a corresponding link in every newsletter. You also have the option of unsubscribing from the newsletter at any time directly on our website or informing us of this in any other way.

The legal basis for data processing for the purpose of sending newsletters is Art. 6 Para. 1 lit. a GDPR.

## 9. Web analysis

### Google Analytics

On our websites we use Google Analytics, a web analysis service of Google Ireland Limited (<https://about.google/intl/de/>) (Gordon House, Barrow Street, Dublin 4, Ireland; hereinafter "Google"). In this context, pseudonymised user profiles are created and cookies (see "Cookies") are used. The information generated by the cookie about your use of this website such as

1. browser type/version,
2. operating system used,
3. referrer URL (the previously visited page),
4. host name of the accessing computer (IP address),
5. time of server request,

are transferred to a Google server in the USA and stored there. This information is used to evaluate the use of the website, to compile reports on website activity and to provide other services relating to website activity and internet usage for market research purposes and to tailor these internet pages to meet requirements. This information may also be transferred to third parties if this is required by law or if third parties process this data on behalf of third parties. Under no circumstances will your IP address be merged with other Google data. The IP addresses are anonymised so that an allocation is not possible (IP masking).

You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website.

You have given your consent to this via our opt-in cookie banner in accordance with Art. 6 Para. 1 lit. a GDPR.

You can also prevent the collection of data generated by the cookie and related to your use of the website (including your IP address) and the processing of this data by Google by downloading and installing a browser add-on (<https://tools.google.com/dlpage/gaoptout?hl=de>)

As an alternative to the browser add-on, especially for browsers on mobile devices, you can also prevent Google Analytics from collecting data by clicking on the following link: [Disable Google Analytics](#). An opt-out cookie is set to prevent your data from being collected in the future when you visit this website. The opt-out cookie

applies only to this browser and only to our website and is placed on your device. If you delete the cookies in this browser, you must set the opt-out cookie again. You can find further information on data protection in connection with Google Analytics in the Google Analytics help (<https://support.google.com/analytics/answer/6004245?hl=de>)

## **10. advertising**

### **10.1 Google (AdWords) Remarketing**

Our website uses the functions of Google AdWords Remarketing, hereby we advertise this website in the Google search results, as well as on third-party websites. Provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("Google"). To this end, Google places a cookie in the browser of your terminal device, which automatically enables interest-based advertising using a pseudonymous cookie ID and based on the pages you visit.

You have given your consent to this via our opt-in cookie banner within the meaning of Art. 6 Para. 1 lit. a GDPR.

Additional data processing will only take place if you have consented to Google linking your internet and app browser history to your Google Account and using information from your Google Account to personalize ads you view on the web. In this case, if you are logged into Google while browsing our site, Google will use your information in conjunction with Google Analytics data to create and define cross-device remarketing audience lists. Google will temporarily link your personal data to Google Analytics data in order to form target groups.

You can permanently disable the setting of cookies for ad preferences by downloading and installing the browser plug-in available at the following link: <https://adssettings.google.com/authenticated?hl=de>

Alternatively, you can inform yourself about the setting of cookies at the Digital Advertising Alliance at the Internet address [www.aboutads.info](http://www.aboutads.info) and make settings for this. Finally, you can set your browser so that you are informed about the setting of cookies and decide individually whether to accept them or whether to exclude the acceptance of cookies in certain cases or in general. If cookies are not accepted, the functionality of our website may be restricted.

Google Ireland Limited, based in Ireland, is certified for the US-European data protection agreement "Privacy Shield", which ensures compliance with the data protection level applicable in the EU.

Further information and the privacy policy regarding advertising and Google can be found here: <https://policies.google.com/technologies/ads>

### **10.2 Google Optimize (A/B Testing Tool)**

Our website also uses Google Optimize. Google Optimize analyzes the use of different variants of our website and helps us to improve the usability according to the behavior of our users on the website. Google Optimize is a tool integrated into

Google Analytics. Google Tag Manager is also a Google product that allows us to manage website tags through an interface. The Tag Manager is a cookie-free domain and does not collect personally identifiable information. The tool triggers other tags that may themselves collect data. Google Tag Manager does not access this data. If deactivation has been made at the domain or cookie level, it will persist for all tracking tags implemented with Google Tag Manager. If you do not wish to receive interest-based advertising, you may opt out of Google's use of cookies for these purposes by visiting the <https://support.google.com/ads/answer/7395996> page.

## **11 Plugins and other services**

### **YouTube (Videos)**

We have integrated components from YouTube on this website. YouTube is an Internet video portal that enables video publishers to post video clips and other users to view, evaluate and comment on them free of charge. YouTube permits the publication of all kinds of videos, why both complete film and television broadcasts, in addition, music videos, Trailer or videos made by users are callable over the Internet portal.

YouTube's operating company is YouTube, LLC, 901 Cherry Ave, San Bruno, CA 94066, USA. The YouTube, LLC is a subsidiary of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

Each time you access one of the individual pages of this website, which is operated by us and on which a YouTube component (YouTube video) has been integrated, the Internet browser on your IT system is automatically prompted by the respective YouTube component to download a display of the corresponding YouTube component from YouTube. More information about YouTube can be found at <https://www.youtube.com/intl/en/yt/about/> . As part of this technical process, YouTube and Google receive information about which specific subpage of our website you are visiting.

If the person concerned is logged in to YouTube at the same time, YouTube recognizes which specific subpage of our website you are visiting by calling up a subpage containing a YouTube video. This information is collected by YouTube and Google and assigned to your YouTube account.

YouTube and Google receive information via the YouTube component that you have visited our website whenever you are logged in to YouTube at the same time as accessing our website; this takes place regardless of whether you click on a YouTube video or not. If you do not want this information to be transmitted to YouTube and Google in this way, you can prevent it from being transmitted by logging out of your YouTube account before you visit our website.

You have given your consent to this via our opt-in cookie banner within the meaning of Art. 6 Para. 1 lit. a DS-GVO.

The data protection regulations published by YouTube, which can be accessed under <https://policies.google.com/privacy?hl=de&en&gl=en>, provide information on the collection, processing and use of personal data by YouTube and Google.



## **12. Privacy policy according to art. 13 GDPR**

The protection of personal data is important to Siteco GmbH. Siteco GmbH therefore processes your personal data in accordance with the provisions of the European Basic Data Protection Regulation (GDPR) and other applicable legal provisions for the protection of personal data and data security. Further information can be found below.

# Data Protection Declaration of Siteco GmbH

This data protection declaration describes how your personal data is processed as a customer, supplier or partner of **Siteco GmbH**. It explains how **Siteco GmbH** uses your personal data, what measures are taken to protect your data and what rights you have with regard to your personal data.

## Introduction

The protection of personal data is important to **Siteco GmbH**. Therefore **Siteco GmbH** processes your personal data in accordance with the provisions of the European General Data Protection Regulation (GDPR) and other applicable legal provisions for the protection of personal data and data security.

## The purpose of the processing, the categories of data and the legal basis for the processing

**Siteco GmbH** processes your personal data exclusively in order to communicate with you, to pre-prepare or process business transactions or to inform you about innovations at your request. In this context, a large number of processing activities fall to the following are listed:

- Support of customers and interested parties
- Preparation and execution of contracts
- Planning and realization of projects
- Information for customers and interested parties about the latest news and innovations
- Compliance with legal obligations, e.g: Accounting, bookkeeping and audit-ing requirements

**Siteco GmbH** processes personal data that you have provided yourself or that is collected in connection with your business relationship with us for the above-mentioned purposes. These are the following categories of data:

- contact details
- Data required to create and close business processes
- Financial, bank and creditworthiness data
- contract data
- Insurance and damage data
- Data to be collected or processed for purposes of public interest

**Siteco GmbH** processes your personal data based on the following regulations:

- for the purpose of conducting business processes (Article 6 (1) (b) GDPR),
- to fulfil legal obligations (Article 6 (1) (c) GDPR), or
- to safeguard the legitimate interests of **Siteco GmbH**, taking into account the interests of the persons concerned worthy of protection (Article 6 (1) (f) GDPR).
- If in individual cases you have expressly given your consent to the processing of your personal data, this consent is the legal basis for the processing (Article 6 (1) (a) GDPR).

## 2. Transmission and passing on of personal data

**Siteco GmbH** transfers your personal data to third parties such as other companies of the OSRAM Group and, in the case of internal procedures, to service providers who may only process your data on our behalf and in accordance with our instructions (Art. 28 GDPR) within the framework of the processing of their business transactions pursuant to Art. 6 Para. 1 lit a) - c) and f) GDPR. These partners have been checked by us for compliance with data protection and are bound by contract.

More information can be found at the end of this document.

## 3. Storage periods

Unless an explicit storage period is specified at the time of collection, your personal data will be deleted if it is no longer required for the fulfilment of the purpose of storage and if no legal storage obligations (e.g. commercial, tax or pension law storage obligations) make longer storage necessary.

## 4. Revocability of declarations of consent granted

In cases where you have given **Siteco GmbH** permission to process your personal data, you have the right to revoke this permission at any time with effect for the future. This means that the processing that took place before the revocation took place based on the consent lawfully.

## 5. Your rights

If you enter into business contact with **Siteco GmbH**, apply for a job or are employed there, you may have the right to use **Siteco GmbH**:

- to obtain information about personal data processed by you,
- require the rectification of inaccurate personal data,
- request the deletion of the personal data processed,
- require the limitation of the processing of personal data,
- request the transfer of the data, or
- to object to the processing of personal data.

## 6. Siteco GmbH Data Protection Officer

The data protection officer of **Siteco GmbH** will be pleased to inform you in detail about the rights to which you are entitled. Simply contact [lothar.becker@datenschutz-it.de](mailto:lothar.becker@datenschutz-it.de) or the **contact person responsible for you**.

In addition to the above-mentioned contact options at **Siteco GmbH** you also have the option of contacting the responsible data protection supervisory authority at any time.

The supervisory authority responsible for Bavaria can be reached at:

### **Bavarian State Office for Data Protection Supervision**

Promenade 27  
91522 Ansbach  
Germany

Phone: +49 (0) 981 53 1300  
Fax: +49 (0) 981 53 98 1300  
E-Mail: [poststelle@lda.bayern.de](mailto:poststelle@lda.bayern.de)

## **7. External partners of Siteco GmbH**

Siteco involves various service providers in the processing of personal data, who are obliged to comply with data protection regulations via corresponding contracts pursuant to Art. 28 GDPR.

For example, we use the

OSRAM Ltd.  
Marcel-Breuer-Str. 6  
80807 Munich,

The company uses various services, which may also include the processing of personal data.

For the maintenance of our SAP system we rely on services of the

SPV Solution Products, Visions AG  
Baierbrunner Str. 23  
81379 Munich, Germany

back.

Where necessary, we transmit data to recipients for business purposes such as forwarding companies or payment service providers.