

Effective: 25. May 2018

effution recognize the importance of protection of personal data and is committed to processing it in compliance with applicable data protection law in all countries in which effution operates.

The effution privacy statement was created considering the European Union General Data Protection Regulation (GDPR, according to EU directive 2016/679 et seq. of 27. April 2016 and German federal data protection act (BDSG), according to data protection adaption and implementation act DSAnpUG-EU, as of 3. March 2017.

Details about the EU GDPR can be found at: https://ec.europa.eu/info/law/law-topic/data-protection_en

Please be aware that certain effution software products, services and websites may provide additional or more specific privacy information.

The effution privacy statement applies to natural persons located in the European Union (EU). In case it is in compliance to the applicable legal requirements, reasonable and applicable to us, we will try to apply the EU data protection rules also to natural persons outside the EU.

effution webpage and services may provide links to third-party websites and services, for your convenience, and information. If you access those links, you will leave the effution web pages and services. effution does not control those third-party webpages and services or their privacy practices. We do not endorse or support any local content provided by third-party web pages or services. Information that you make available to these third-parties are not covered by the privacy policy of effution. Hence, we encourage you to review the privacy policy of any site you interact with before allowing the collection and use of your personal information.

We are always striving to a simple representation. However, the use of our services by internet technologies comes along with certain terms, such as cookies. If you are not familiar with your web browser and the key words on the Internet, we recommend reviewing the most important key words first.

General information about data processing

- Description and scope of data processing

In principle, we process personal data of our users only insofar as this is

necessary to provide a functioning website, content, and services. The processing of personal data of our users will be regularly executed only with the consent of the user. An exception applies to cases in which prior consent cannot be obtained for reasons of facts and the processing of the data is permitted by law.

- Legal basis for the processing of personal data

Insofar as we obtain the consent of the data subject for processing of personal data, Art. 6 para. 1 lit. a EU General Data Protection Regulation (GDPR) applies as legal basis.

In the processing of personal data necessary for the performance of a contract to which the data subject is a party, Art. 6 para. 1 lit. b GDPR as legal basis. This also applies to processing operations required to carry out pre-contractual actions.

Insofar as processing of personal data is required to fulfill a legal obligation that is subject to our company, Art. 6 para. 1 lit. c GDPR applies as legal basis.

In case that vital interests of the affected person or another natural person require the processing of personal data, Art. 6 para. 1 lit. d GDPR applies as legal basis.

In case the processing is necessary to safeguard the legitimate interests of our company or a third party, and if the interests, fundamental rights and freedoms of the affected person do not prevail over the first interest, Art. 6 para. 1 lit. f GDPR applies as legal basis for processing.

- Retention and data deletion

The personal data of the affected person will be deleted or blocked as soon as the purpose of the storage is expired. In addition, such storage may be provided by the European or national legislator in EU regulations, laws or other regulations to which the controller is subject to. Blocking or deletion of the data also takes place when a storage period expires prescribed by the standards mentioned, unless there is a need for further storage of the data for conclusion of a contract or fulfillment of the contract.

Provision of the website

- Description and scope of data processing

Each time our website is accessed, our system automatically collects data and information from the computer system of the calling computer. The following data will be collected:

- Information about the browser type and version used
- The operating system of the user
- The IP address of the computer of the user
- Date and time of access
- Websites from which the user's system accesses our website
- Websites that are accessed by the user's system through our website

The data will be stored in the log files of our system as well. A storage of this data together with other personal data of the user does not take place.

- Legal basis for data processing

The legal basis for the temporary storage of data and log files is Art. 6 para. 1 lit. f GDPR.

- Purpose of data processing

The temporary storage of the IP address by the system is necessary to allow delivery of the website to the computer of the user. For that reason, the user's IP address must be kept for the duration of the session.

Storage in log files is done to ensure the functionality of the website. In addition, the data is used to optimize the website and to ensure the security of our IT systems. An evaluation of the data for marketing purposes does not take place in this context.

For these purposes, our legitimate interest in the processing of data according to Art. 6 para. 1 lit. f GDPR.

- Retention and deletion of data

Your personal data will be stored for processing as long as necessary and will be deleted as soon as the purpose of its collection is achieved.

The storage of personal data may continue if there are valid reasons to retain your personal information, e.g. regulations by law, settlement of disputes or enforcement of contractual agreements.

In the case of storing the data in log files, these will be deleted after 30 days, if there are no valid reasons for doing so. An additional retention period is possible. In this case, the IP addresses of the users are deleted or anonymized, so that an assignment to the calling client is no longer possible.

- Revocation

The collection of data for the provision of the website and the storage of the data in log files is essential for the operation of the website. Hence, there is consequently no contradiction on the part of the user.

Utilization of cookies

- Description and scope of data processing

Our website uses cookies. Cookies are text files that are stored in the Internet browser or by the user's internet browser on his computer system. When a user visits a website, a cookie may be stored on the user's computer. This cookie contains a characteristic string that allows the browser to be uniquely identified when the website is accessed again.

We utilize cookies to increase the user experience of our website. Some elements of our website require that the calling browser can be identified even after moving to another website. The following data will be stored and transmitted in cookies:

- Language settings
- Last visited URL
- Login information

In addition, we use cookies on our website that allow an analysis of users' browsing behavior.

Therefore, the following additional data can be transmitted:

- Entered search terms
- Frequency of page views

- Usage of website functions

The data we collected of the users in this way are pseudonymized by technical precautions. Therefore, an assignment of the data to the calling user is no longer possible. The data will not be stored together with other personal data of the users.

When accessing our website, users are informed by an information banner about the use of cookies for analysis purposes and will be referred to this privacy statement. In this privacy statement we also give a hint of how the storage of cookies in the browser settings can be prevented.

In case a non-technical cookie is necessary for the provision of the service, the user is informed about the use of cookies for analysis purposes and his consent to the processing of the personal data used in this connection is obtained when accessing this website. In this context, there is also a reference to this privacy statement.

- Legal basis for data processing

The legal basis for the processing of personal data using technical cookies is Art.6 Abs.1 lit.f GDPR.

The legal basis for the processing of personal data using non-technical cookies for analysis purposes is provided that the user has consented, is Article 6 (1) lit. a GDPR.

- Purpose of data processing

The purpose of using technically necessary cookies is to facilitate the usage of our websites for users. Some features of our website cannot be offered without the use of cookies. For these, it is necessary that the browser is recognized even after switching to another website. We require cookies for the following functions:

- Consideration of language settings
- Automated redirection to the last visited URL
- Storage of user-experience settings, e.g. menu navigation and readability for blind people
- Other settings to improve navigation, readability, and accessibility.

The user data collected through technically necessary cookies will not be used for creation of user profiles.

To provide services in other systems, advanced settings in user profiles may be made by the user. The usage is voluntary and the extent of the capabilities that is used is determined solely by the user. In this context, there is also a reference to this privacy policy.

The usage of the analysis cookies is for the purpose of improving the quality of our website and its contents. Through the analysis cookies, we learn how the website is used that enables us to constantly optimize our service and the user experience.

For these purposes, our legitimate interest in the processing of personal data pursuant to Art. 6 para. 1 lit. f GDPR.

- Retention and data deletion as well as revocation

Cookies are stored on the computer of the user and transmitted by this on our side. Therefore, the user has full control about the usage of cookies. By changing the settings in your internet browser, you can disable or restrict the transmission of cookies. Already saved cookies can be deleted at any time. This can also be done automatically. In case you disabled the usage of cookies for our website, it may not be possible to use all the functions of the website.

We do not use web beacons and basically no flash technology, hence no flash content and therefore no flash cookies.

General note about Flash cookies:

The transmission of Flash cookies cannot be prevented by the settings of the browser, but by changing the settings of the Flash Player.

Newsletter

- Description and scope of data processing

On our website you can subscribe to a free newsletter. The data from the form are transmitted to us when registering for the newsletter. The following data will be recorded:

- First and last name of the user
- Name of the company of the users
- Email address of the user
- Type / topic of the newsletter

In addition, the following data is collected upon registration:

- IP address of the calling computer
- Date and time of registration

For the processing of the data, your consent is obtained during the registration process and reference is made to this privacy policy.

If you purchase software or services on our website and deposit your e-mail address here, this can subsequently be used by us to send a newsletter. In such a case, the newsletter will only send direct mail for your own software or services.

There is no disclosure of the data to third parties, in connection with the processing of data for the sending of newsletters. The data will be used exclusively for sending the newsletter.

- Legal basis for data processing

The legal basis for the processing of the data after the user has registered for the newsletter with consent of the user is Art. 6 para. 1 lit. a GDPR.

The legal basis for sending the newsletter as a result of the sale of goods or services is § 7 Abs. 3 UWG.

- Purpose of data processing

The collection of the user's e-mail address serves the delivery of the newsletter.

The collection of other personal data in the context of the registration process serves to prevent misuse of the services or the email address used.

- Retention and data deletion

The data will be deleted as soon as it is no longer necessary for the purpose of its collection. The email address of the user is therefore stored as long as the subscription to the newsletter is active.

The other personal data collected during the registration process will normally be automatically deleted after a period of 30 days.

- Revocation
The subscription to the newsletter may be terminated at any time by the user. For this purpose, there is a corresponding link in each newsletter. This also allows a revocation of the consent to the storage of the personal data collected during the registration process.

Registration

- Description and scope of data processing
On our website, we offer users the opportunity to register by providing personal information. The data is entered into a form, transmitted to us and stored. A transfer of data to third parties is not the case. The following data is collected during the registration process:
 - First Name and last name of the user
 - Email address of the user
 - Company name of the user
 - Subject
 - Message

At the time of registration, the following data will also be stored:

- IP address of the user's computer
- Date and time of registration

As part of the registration process, the consent of the user to processing his data is obtained.

- Legal basis for data processing
Legal basis for the processing of the data in case of the consent of the user is Art. 6 para. 1 lit. a GDPR.

In case the registration serves the fulfillment of a contract of which the user is a party or the implementation of pre-contractual measures, an additional legal basis for the processing of the data is Art. 6 para. 1 lit. b GDPR.

- Purpose of data processing
User registration is required for the provision and delivery of certain

content and services on our website.

- Retention and data deletion

The data will be deleted as soon as it is no longer necessary for the purpose of its collection.

This is the case for the data collected during the registration process when the registration on our website is canceled or modified.

- Revocation

As a user, you have the option of canceling the registration at any time. You can change the collected data stored about you at any time.

In case you have created or received an account, the deletion of your account can be done by yourself or in the case of contractual services also be carried out by the person in charge of your company.

If the data is required to fulfill a contract or to carry out pre-contractual measures, premature deletion of the data is only possible, unless contractual or legal obligations preclude deletion.

Contact form and Email contact

- Description and scope of data processing

On our website is a contact form available, which can be used for electronic contact. If a user utilizes this option, the data entered in the input mask will be transmitted to us and saved. These data are:

- First and last name of the user
- Email address of the user
- Company name of the user
- Subject
- Message

At the time of registration, the following data is also stored:

- IP address of the computer of the user
- Date and time of registration

For the processing of the data in the context of the sending process your consent is obtained and a referred to this privacy statement will be provided.

Alternatively, contact via the provided email address is possible. In this case, the user's personal data will be stored transmitted by his email.

In this context, there is no disclosure of the data to third parties. The data is used exclusively for processing the conversation.

- Legal basis for data processing

Legal basis for the processing of the data is in the presence of the consent of the user is Art. 6 para. 1 lit. a GDPR.

The legal basis for the processing of the data transmitted in case of sending an email is Article 6 (1) lit. f GDPR. If the email contact aims to conclude a contract, then additional legal basis for the processing is Art. 6 para. 1 lit. b GDPR.

- Purpose of data processing

The processing of the personal data from the input mask serves us only to process the contact. In the case of contact via email, this also includes the required legitimate interest in the processing of the data.

The other personal data processed during the sending process serve to prevent misuse of the contact form and to ensure the security of our IT systems.

- Retention and data deletion

The data will be deleted as soon as it is no longer necessary for the purpose of its collection. For the personal data from the contact form and those sent by email, this is the case when the respective conversation with the user has ended. The conversation is ended when it can be inferred from the circumstances that the relevant facts have been finally clarified.

The personal data additionally collected during the sending process are usually automatically deleted after a period of 30 days.

- Revocation

The user has the possibility at any time to revoke his consent to the processing of the personal data. If the user contacts us by email, he may object to the storage of his personal data at any time. In such a case, the conversation cannot continue.

In case of revocation of the consent and the contradiction of the storage an email of the user to our email contact with the corresponding subject line is sufficient.

All personal data stored in the course of contacting will be deleted in this case.

Web analysis

- Description and scope of data processing

We use technologies such as Google Analytics on our website to analyze the surfing behavior of our users. The software sets a cookie on the computer of the users (for cookies see above). If individual pages of our website are called, the following data is stored:

- Two bytes of the IP address of the user's computer
- The called webpage
- The website from which the user accessed the visited website (referrer)
- The subpages that are accessed from the called webpage
- The duration of accessing the website
- The frequency of visits of the website

The following data can also be saved:

- Status messages
- Warnings
- Error messages

The software runs exclusively on our servers and systems. A storage of the personal data of the users takes place only there. A transfer of the data to third parties does not take place.

The software is set so that the IP addresses are not completely stored but 2 bytes of the IP address are masked. In this way, an assignment of the shortened IP address to the calling computer is no longer possible.

- Legal basis for data processing

The legal basis for processing users' personal data is Article 6 (1) lit. f GDPR. If the registration serves the fulfillment of a contract of which the user is a party or the implementation of pre-contractual measures, an

additional legal basis for the processing of the data is Art. 6 para. 1 lit. b GDPR.

- Purpose of data processing

The processing of users' personal data enables us to analyze the surfing behavior of our users. By analyzing the obtained data, we are able to compile information about the usage of the individual components of our website. This helps us to constantly improve our website and its user experience.

For these purposes, our legitimate interest lies in the processing of the data according to Art. 6 para. 1 lit. f GDPR. The anonymization of the IP address sufficiently takes into account the interest of users in their protection of personal data.

- Retention and data deletion

The data will be deleted as soon as they are no longer needed for our recording purposes.

In our case, this is usually automatically deleted after a period of 30 days. Exceptions to this are individually agreed benefits.

- Revocation

Cookies are stored on the computer of the user and transmitted by this to our website. Therefore, the user has full control over the use of cookies. By changing the settings in your internet browser, you can disable or restrict the transmission of cookies. Already saved cookies can be deleted at any time. This can also be done automatically. If cookies are disabled for our website, it may not be possible to use all the functions of the website.

Depending on the services offered, we offer our users the option of opting out of the analysis process. For this you must follow the appropriate link. In this way, another cookie is set on your system, which signals our system not to save the data of the user. If the user deletes the corresponding cookie in the meantime from his own system, he must set the opt-out cookie again.

Rights of the data subject

If your personal data is processed, you are an affected person according to the GDPR and you have the following rights to the controller:

- Information and access to personal data

You may ask the controller to confirm if your personal data is processed by us.

If such processing is available, you can request information from the controller about the following information:

- the purposes for which the personal data are processed;
- the categories of personal data that are processed;
- the recipients or the categories of recipients to whom the personal data relating to you have been disclosed or are still being disclosed;
- the planned duration of storage of personal data concerning you or, if specific information is not available, criteria for determining the duration of storage;
- the right of rectification or erasure of personal data concerning you, a right to restriction of processing by the controller or a right to object to such processing;
- the existence of a right of appeal to a supervisory authority;
- all available information on the source of the data if the personal data are not collected from the data subject;
- the existence of automated decision-making including profiling in accordance with Article 22 (1) and (4) GDPR and - at least in these cases - meaningful information about the logic involved and the scope and intended impact of such processing on the data subject.

You have the right to request information about whether your personal information relates to a third country or an international organization. In this context, you can request the appropriate guarantees in accordance with Art. 46 GDPR according to the transfer.

This right of information may be limited to the extent that it is likely to render impossible or seriously affect the realization of the research or statistical purposes and the restriction is necessary for the performance of the research or statistical purposes.

- Right of rectification

You have a right to rectification and / or completion to the controller, if the personal data you process is incorrect or incomplete. The controller must execute correction immediately.

Your right of rectification may be limited to the extent that it is likely to render impossible or seriously affect the realization of research or statistical purposes and the restriction is necessary for the performance of research or statistical purposes.

- Rights to restriction of processing

You may request the restriction of the processing of your personal data under the following conditions:

- if you contest the accuracy of your personal information for a period of time that enables the controller to verify the accuracy of your personal information;
- the processing is unlawful and you refuse to delete the personal data and instead request the restriction of the use of personal data;
- the controller no longer requires personal data for the purposes of processing, but you need them for the purposes of asserting, exercising or defending legal claims;
- if you have filed an objection against the processing pursuant to Art. 21 (1) GDPR and it is not yet certain whether the legitimate reasons of the controller outweigh your reasons;
- if the processing of your personal data has been restricted, these data may only be used with your consent or to assert, exercise or defend legal claims or to protect the rights of another natural or legal person or for important reasons the public interest of the European Union or of a member state;
- if the restriction of processing according to the above-mentioned conditions have been restricted, you will be informed by the person in charge before the restriction is superseded.

Your right to restriction of processing may be restricted to the extent that it is likely to render impossible or seriously affect the realization of the research or statistical purposes and the restriction is necessary for the performance of the research or statistical purposes.

- Rights of erasure

- a) Deletion obligation

You may require the controller to delete your personal information without delay, and the controller is required to delete that information immediately if one of the following is true:

- Your personal data are no longer necessary for the purposes for which they were collected or otherwise processed.
- You revoke your consent to the processing in accordance with Article 6 (1) (a) or Article 9 (2) (a) of the GDPR and there is no other legal basis for the processing.
- You place acc. Art. 21 (1) GDPR objection to the processing and there are no prior justifiable reasons for the processing, or you lay gem. Art. 21 para. 2 GDPR Opposition to processing.
- Your personal data has been processed unlawfully.
- The deletion of personal data concerning you is required to fulfill a legal obligation under European Union law or the law of the member states to which the controller is subject.
- Your personal data were collected in relation to information society services offered pursuant to Art. 8 (1) GDPR.

b) Information to Third-party

In case the controller has made your personal data, public and is acc. Article 17 (1) of the GDPR, it shall take appropriate measures, including technical means, to inform data controllers who process the personal data that you have been identified as being affected, taking into account available technology and implementation costs persons requesting deletion of all links to such personal data or of copies or replications of such personal data.

c) Restrictions

The right to erasure does not exist if the processing is necessary

- exercising the right to freedom of expression and information;
- to fulfill a legal obligation required by the law of the Union or of the Member States to which the controller is subject, or to perform a task of public interest or in the exercise of public authority delegated to the controller;
- for archival purposes of public interest, scientific or historical research purposes or for statistical purposes acc. Article 89 (1) GDPR, to the extent that the law referred to in subparagraph (a) is likely to render impossible or seriously affect the achievement of the objectives of that processing, or
- or reasons of public interest in the field of public health pursuant to Art. 9 (2) lit. h and i and Art. 9 (3) GDPR;

- to assert, exercise or defend legal claims.
- Notification obligation

In case you have alleged the right of rectification, erasure or restriction of processing to the controller, he / she is obliged to notify all recipients to whom your personal data have been disclosed of this correction or deletion of the data or restriction of processing, unless: this proves to be impossible or involves a disproportionate effort.

You have a right to the controller to be informed about these recipients.
- Right to object

You have the right at any time, for reasons that arise from your particular situation, against the processing of your personal data, which pursuant to Art. 6 para. 1 lit. e or f GDPR takes an objection; this also applies to profiling based on these provisions.

The controller will no longer process your personal data unless he can demonstrate compelling legitimate reasons for processing that outweigh your interests, rights and freedoms, or the processing is for the purpose of enforcing, exercising or defending legal claims.

If the personal data relating to you are processed for direct marketing purposes, you have the right to object at any time to the processing of your personal data for the purpose of such advertising; this also applies to profiling insofar as it is associated with such direct mail.

In case you object to processing for direct marketing purposes, your personal data will no longer be processed for these purposes.

Regardless of directive 2002/58 / EC, you have the option, in the context of the use of information society services, of exercising your right to object through automated procedures that use technical specifications.

You also have the right, for reasons that arise from your particular situation, in processing of your personal data for scientific or historical research purposes or for statistical purposes. Art. 89 para. 1 GDPR is to be contradicted.

Your right of objection may be limited to the extent that it is likely to render impossible or seriously affect the realization of the research or statistical purposes, and that the restriction is necessary for the performance of the research or statistical purposes.
- Right of withdrawal of the personal data declaration of consent

You have the right to revoke your data protection declaration at any

time. The revocation of consent does not affect the legality of the processing carried out on the basis of the consent until the revocation.

- Automated individual decision-making, including profiling

You have the right not to be subjected to a decision based solely on automated processing - including profiling - that will have legal effect or similarly affect you in a similar manner. This does not apply if the decision:

- is required for the conclusion or performance of a contract between you and the controller,
- by European Union or member state legislation to which the controller is subject, and where such legislation contains appropriate measures to safeguard your rights and freedoms and your legitimate interests, or
- with your express consent.

However, these decisions must not be based on special categories of personal data under Art. 9 (1) GDPR, unless Art. 9 (2) lit. a or g GDPR applies and reasonable measures have been taken to protect the rights and freedoms as well as your legitimate interests.

With regard to the cases referred to in (1) and (3), the person responsible shall take appropriate measures to uphold the rights and freedoms and their legitimate interests, including at least the right to obtain the intervention of a person by the controller, to express his / her own position and heard on challenge of the decision.

- Right to lodge a complaint with a supervisory authority

Without prejudice to any other administrative or judicial remedy, you shall have the right to complain to a supervisory authority, in particular in the member state of its residence, place of work or place of alleged infringement, if you believe that the processing of the personal data concerning you is against the GDPR violates. The supervisory authority to which the complaint has been submitted shall inform the complainant of the status and results of the complaint, including the possibility of a judicial remedy pursuant to Article 78 of the GDPR.

The relevant supervisory authorities in the European Union can be found at:

http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm

Name and address of controller

The controller, according to GDPR and other federal regulations by law of the member states of the European Union as well as other applicable data protection regulations is:

effution GmbH
Werner-von-Siemens-Str. 6
86159 Augsburg, Germany

Phone: +49 821 29859 – 700

Email: info@effution.com

Website: www.effution.com

Name and address of data protection officer

Privacy
Werner-von-Siemens-Str. 6
86159 Augsburg, Germany

Phone: +49 821 29859 – 700

Email: privacy@effution.com

Website: www.effution.com

Changes to our privacy statements

effution may update this privacy statement at any time, especially in case of further specification or adjustments required by regulations by law. In case we making changes to this privacy statement, we will add a new date to the top of this document.

Important notes on translations

This privacy policy may also be provided in languages other than German. The translation may have been done by a person or a software program without being tested by effution. These translations are provided for convenience and effution gives not for the correctness and completeness, regardless of whether the translation was created manually or automatically.