

## PRIVACY POLICY FOR THE WEBSITE COMMSOLID.COM

The protection of your personal data is a special concern to us, Commsolid GmbH, Am Waldschlösschen 1, 01099 Dresden, Germany (hereinafter referred to as “we”, “us” or “our”). We keep confidential your personal data transmitted by you in the context of using our website [www.commsolid.com](http://www.commsolid.com) (the “Website”) and process it in accordance with data protection regulations, in particular the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016; “GDPR”) as well as this Privacy Policy.

This Privacy Policy informs you in detail which of your personal data we collect during your visit of our Website, how the data is used and which control and information rights you may be entitled to.

### 1. Definitions

- **Personal Data** means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more specific factors.
- **Process or Processing** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaption or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### 2. Data Controller

Data controller for this Website pursuant to Article 4 no. 7 GDPR is  
Commsolid GmbH, Am Waldschlösschen 1, 01099 Dresden, Germany,  
telephone: +49 351 219 48 800,  
e-mail: [datenschutzbeauftragter@commsolid.com](mailto:datenschutzbeauftragter@commsolid.com).

### **3. Data Protection Officer**

Our data protection officer Gregor Klar, external data protection officer, brainsphere 1 GmbH, Witzlebenstraße 21a, 14057 Berlin, Germany, can be reached at telephone: +49 30 32701993

e-mail: [datenschutzbeauftragter@commsolid.com](mailto:datenschutzbeauftragter@commsolid.com).

### **4. Processing of your Data when Using our Website for Informational Purposes**

When you visit our Website, our web servers collect and store data temporarily in so-called „log files“. These are internet traffic data that your browser transfers to our server automatically. Log files only contain Personal Data on a limited scale. The Processed data includes information about:

- your IP-address
- your end user device (type, name, ID)
- your Browser (type/version)
- your operating system (including language settings)
- time and date of your server enquiry
- content of your requests
- your display resolution
- your internet service provider
- the referral webpage (referrer-URL)
- websites accessed from your device through our Website.

We use this data to enable you to use our Website (e.g. to adapt our Website to the needs of your end user device).

The legal basis for this Processing is Article 6 para. 1 sentence 1 lit. b GDPR, because we require the automatically Processed data to ensure the efficient usability of our Website.

In addition, this data is collected for reasons of system safety and security.

The legal basis for this Processing is Article 6 para. 1 sentence 1 lit. f GDPR, as the Processing serves our legitimate interest to ensure the protection of our systems and servers as well as the stability, safety and security of the Website.

**As far as the Processing is based on our legitimate interests, you have the right to object, on grounds relating to your particular situation, at any time to this kind of Processing. To exercise this right, you can contact us at any time using the contact details provided in Section 2.**

The log files are retained for a period not exceeding eight (8) weeks and will be properly erased afterwards, unless longer retention is required or justified by law.

## **5. Cookies**

The Website uses cookies. Cookies are small text files that are downloaded to your device (computer, tablet, smartphone etc.) and stored when you are visiting our Website. These text files can be read by our Website and help to identify you when you visit our Website again.

Some cookies store your preferences and will be deleted automatically after the end of the browser session, i.e. after closing the browser (so called session cookies). Other cookies are being used for adapting websites to user needs and remain on the device (so called permanent/persistent cookie).

You can change your browser settings so that cookies are blocked in general or you get notified when cookies are sent to your end device. There are different ways to handle cookies. Please use your browser's instruction or the help menu to learn more about how to adapt your browser settings.

In the following Section we will explain which cookies we use.

### **5.1 viewed\_cookie\_policy**

We use the viewed\_cookie\_policy cookie on our Website. This is a persistent cookie that contains information about whether you have agreed to the use of cookies and ensures that the cookie notice does not appear permanently or whenever you revisit the Website.

The Processing of this information is technically necessary for enabling you to use our Website. The legal basis for the use of this cookie and the Processing is the performance of the contract (Art. 6 para. 1 lit. b GDPR).

The cookie is deleted after one year.

- 5.2 Furthermore, we work with other service providers who support us in improving our Website or who offer additional features. Such service providers might use their own cookies. You can find further information on this in Section 6.

## **6. Third-Party Services**

### **6.1 YouTube Videos and Related Data Collection and Use**

On our Website you can watch videos that are embedded using plugins from YouTube (a service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; „**YouTube**“). On our Website the option “extended data protection mode” is used for YouTube videos. Pursuant to YouTube’s specifications no information on the user is stored unless you view an embedded video. Not until you start the video the data referred to in the following Section is transferred. We have no influence on this data transfer.

By visiting the Website, YouTube receives the information that you have accessed the corresponding subpage of our Website. In addition, the data that is collected when you visit our Website for information purposes is transmitted. This occurs regardless of whether YouTube provides a user account that you are logged in to or whether there is no user account. If you are logged in to Google, this information is assigned directly to your YouTube member account. If you do not want your profile to be associated to YouTube, you will need to log out of Google before activating the play button. YouTube stores your data as usage profiles and uses them for advertising purposes, market research and/or design of its website according to your needs. Such an evaluation is carried out (even for non-logged-in users) especially in order to provide customized advertising and to inform other users of the social network about your activities on our Website. You have the right to object to the creation of these user profiles. To exercise this right you must contact YouTube.

By embedding the YouTube video into our Website, a connection to the Google Double-Click network is automatically established when you access our Website. No cookies are set in your browser through this process. However, if DoubleClick cookies are already stored in your browser, they will be transmitted as part of the request. According to information provided by YouTube, data is not transferred until you start the video.

Further information on the purpose and scope of data collection and Processing by YouTube can be found in YouTube's privacy policy. There you will also find further information on your rights and settings to protect your privacy: <https://www.google.de/intl/de/policies/privacy>.

Google also Processes your Personal Data in the USA and has submitted to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.

## 6.2 Google Web Fonts

For uniform representation of fonts, this Website uses web fonts provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (“**Google**”). When you access this Website, your browser loads the required web fonts into your browser cache to display texts and fonts correctly.

For this purpose your browser has to establish a direct connection to Google’s servers. Google thus becomes aware that our Website was accessed via your IP address. The use of Google Web Fonts is done in the interest of a uniform and appealing presentation of our Website. This constitutes a legitimate interest pursuant to Article 6 para. 1 sentence 1 lit. f GDPR.

If your browser does not support web fonts, a standard font is used by your computer.

You can find further information about Google Web Fonts at <https://developers.google.com/webfonts> and in Google's privacy policy at <https://www.google.com/policies/privacy/>.

## 7. Sharing of Personal Data with Third Parties

7.1 In compliance with applicable data protection provisions, we may use third-party data processors (Article 28 GDPR) acting on our behalf and providing services in connection with our Website (e.g. host providers) and may disclose your Personal Data to such external

processors. The data transfer is always based on data processing agreements. Our data processors will only use your Personal Data to the extent necessary to perform their specific tasks. They are contractually obliged to Process your Personal Data only on our behalf and in accordance with our instructions.

Insofar as such third-party data processors are located outside the European Union or the European Economic Area, they are either located in third countries, for which there is an adequacy decision from the European Commission, or an adequate level of protection is guaranteed by standard data protection clauses issued by the European Commission, which we entered into with the respective third-party data processor.

In particular, your Personal Data will be disclosed for the above-mentioned purposes to the following third-party as a data processor:

- Host-Provider 1&1 IONOS SE, Elgendorfer Str. 57, 56410 Montabaur, Germany.

7.2 In case we are legally authorised or obliged (for instance due to applicable law or a judicial or an official order), we may disclose your Personal Data.

## **8. Data Security**

We have appropriate, modern security measures in place to protect your Personal Data from loss, misuse and alteration. Our security policies and privacy policies are regularly reviewed and improved, if necessary. In addition, only authorized employees have access to Personal Data. Although we cannot warrant or guarantee that Personal Data will never be lost, misused, or altered, we will do everything in our power to prevent this.

Please note that data transmission via the internet can involve security gaps. We cannot guarantee the security of the data submitted via our Website during the transmission over the internet. This happens at your own risk.

For security reasons and to protect the transmission of confidential content such as enquiries which you send to us as operator of the Website, this Website uses SSL- respectively TLS-encryption. You can recognize an encrypted connection from the fact that the browser's address line switches from „http://“ to „https://“ and from the padlock symbol in your browser line. When the SSL or TLS encryption is activated, the data you transfer to us cannot be read by third parties.

## 9. Storage of Your Personal Data

Unless retention periods are specified in this Privacy Policy otherwise, the following applies: We will only store your Personal Data as long as necessary to fulfil the purposes for which the Personal Data was collected initially or – where applicable– for the retention period required or justified by applicable laws.

## 10. Your Rights under the GDPR

In particular, but without limitation, you may have the following rights under GDPR:

- **Right of access:** At any time, you have the right to obtain confirmation from us as to whether or not we Process Personal Data about you and, if so, you also have the right to obtain access to your Personal Data stored by us. To exercise this right you can contact us at any time using the contact details provided in Section 2.
- **Right to rectification of your Personal Data:** If we Process Personal Data about you, we endeavour to ensure by implementing suitable measures that the Personal Data is accurate and up-to-date for the purposes for which the Personal Data was collected. If the Personal Data about you is inaccurate or incomplete, you have the right to obtain the rectification of such data. To exercise this right you can contact us at any time using the contact details provided in Section 2.
- **Right to erasure of Personal Data or right to restriction of Processing:** You may have the right to obtain the erasure of your Personal Data or the restriction of Processing of your Personal Data. To exercise this right you can contact us at any time using the contact details provided in Section 2.
- **Right to data portability:** You may have the right to receive the Personal Data concerning you and which you have provided to us in a structured, commonly used and machine-readable format or to transmit those data to another controller. To exercise this right you can contact us at any time using the contact details provided in Section 2.
- **Right to object:** You have the right to object to the Processing of your Personal Data at any time, if we Process your Personal Data in order to pursue our legitimate interest and if there are grounds relating to your particular situation.

**To exercise this right you can contact us at any time using the contact details provided in Section 2.**

- Right to withdraw a consent: As far as our Processing is based on a consent (pursuant to Art. 6 para. 1 sentence 1 lit. a GDPR), you may withdraw your consent at any time. The withdrawal of consent does not affect the lawfulness of Processing based on the consent before its withdrawal. To exercise this right you can contact us at any time using the contact details provided in Section 2.
- Right to lodge a complaint with supervisory authority: You have the right to lodge a complaint with a data protection supervisory authority located in the European Union.

## **11. Amendments to this Privacy Policy**

We reserve the right to change this Privacy Policy in accordance with updates of our Website. Please visit the Website regularly and check our current Privacy Policy.

This Privacy Policy was last updated on 28.04.2020.