

Privacy policy for website operators according to the specifications of the GDPR / EU-DSGVO

Disclaimer: This is a translation of the official and legally binding original document in German language.

I. Name and address of the responsible entity

The person/company responsible in the sense of the basic data protection regulation and other national data protection laws of the member states as well as other data protection regulations is:

*Provisio GmbH
Wilhelm-Schickard-Str. 1
48149 Münster
Germany
Tel.: +49 251 846924 0
E-Mail: contact-europe@provisio.com
Website: www.provisio.com*

II. Name and address of the data protection officer

A data protection officer of the responsible person/company has not been appointed (according to article 37 paragraph 4 p. 1 DS-GVO and see § 4f BDSG-old as well as § 38 BDSG-new).

III. General information about data processing

1. Extent of processing of personal data

In principle, we collect and use personal data of our users only to the extent necessary to provide a functional website and our content and services. The collection and use of personal data of our users takes place regularly only with the consent of the user. An exception applies to cases in which prior consent cannot be obtained for reasons of fact and the processing of the data is permitted by law.

2. 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 (1) lit. a EU General Data Protection Regulation (GDPR) is the legal basis.

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

Insofar as the processing of personal data is required to fulfill a legal obligation our company is subject to, Art.6 para. 1 lit. c GDPR is the legal basis. In the event that vital interests of the data subject or another natural person require the processing of personal data, Art. 6 (1) lit. d GDPR is the legal basis. If processing is necessary to safeguard the legitimate interests of our company or a third party and if the interest, fundamental rights and fundamental freedoms of the person concerned do not prevail over the former interest, Art. 6 (1) lit. f GDPR is the legal basis for processing.

3. Data deletion and storage duration

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

IV. Provision of the website and creation of log files

1. 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 is collected here:

- (1) IP address of the requesting computer
- (2) Date and time of access
- (3) Name and URL of the retrieved file
- (4) Transferred amount of data
- (5) Message if the retrieval was successful
- (6) Detection data of the browser and operating system used

- (7) Website from which access is made
- (8) Name of your internet access provider

The data is also stored in the log files of our system. A storage of this data together with other personal data of the user does not take place.

2. Legal basis for data processing

The legal basis for the temporary storage of data and logfiles is Art. 6 (1) lit. f GDPR.

3. 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. To do this, 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 information technology systems. An evaluation of the data for marketing purposes does not take place in this context.

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

4. Duration of data storage

The data will be deleted as soon as it is no longer necessary for the purpose of its collection. In the case of collecting the data for providing the website, this is the case when the respective session is completed.

In the case of storing the data in log files, this is the case after 30 days at the latest. An additional storage is possible. In this case, the IP addresses of the users are deleted or alienated, so that an assignment of the calling client is no longer possible.

5. Possibility of opposition and removal

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. There is consequently no user right of contestation.

V. Use of cookies

a) Description and scope of data processing

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

We use cookies to make our website more user-friendly. Some elements of our website require that the calling browser be identified even after a page break.

The following data is stored and transmitted in the cookies:

- (1) SessionID

When accessing our website, users are informed by an information banner about the use of cookies for analysis purposes and the banner refers to this privacy policy. In this context, there is also an indication of how the storage of cookies in the browser settings can be prevented.

b) Legal basis for data processing

The legal basis for the processing of personal data using technically necessary cookies is Art. 6 (1) lit. f GDPR. The legal basis for the processing of personal data using cookies for analysis purposes is in the presence of a corresponding consent of the user Art.6 (1) lit. a GDPR.

c) Purpose of data processing

The purpose of using technically necessary cookies is to facilitate the use of 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 a page change.

We require cookies for the following applications:

- (1) Shop
- (2) Supportforum

The user data collected through technically necessary cookies will not be used to create user profiles.

The use 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 and so we can constantly optimize our offer.

In these purposes, our legitimate interest lies in the processing of personal data according to Art.6 (1) lit. f GDPR.

e) Duration of storage, objection and disposal options

Cookies are stored on the computer of the user and transmitted by the computer to our website. Therefore, as a user, you have 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 to the full.

VI. Newsletter

1. Description and scope of data processing

On our website you can subscribe to a free newsletter. The data from the online input form are transmitted to us when registering for the newsletter. If you purchase goods or services and enter your e-mail address on our website, this can subsequently be used by us to send a newsletter. In such a case, the newsletter will only contain marketing material for similar goods or services.

- (1) Email address
- (2) IP address of the calling computer
- (3) 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.

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

2. Legal basis for data processing

The legal basis for the processing of the data after the user has registered for the newsletter is the consent of the user 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.

3. Purpose of data processing

The collection of the user's email address serves to deliver 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.

4. Duration of storage

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

5. Opposition and removal possibility

Subscription to the newsletter may be terminated at any time by the user concerned. For this purpose, there is a corresponding link in each newsletter.

VII. Registration

1. 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 an online input form and transmitted to us and stored. A transfer of data to third parties does not take place. The following data is collected as part of the registration process:

- (1) Salutation
- (2) First name
- (3) Surname
- (4) Company
- (5) Department
- (6) Position

- (7) Street
- (8) ZIP code / City
- (9) Country
- (10) Region/State
- (11) Time zone
- (12) Language
- (13) Date of birth
- (14) Phone number
- (15) Cell phone number
- (16) Fax number
- (17) URL
- (18) Email
- (19) Geo-coordinates

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

- (20) Date and time of registration

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

2. Legal basis for data processing

Legal basis for the processing of the data is in the presence of the consent of the user according to Art. 6 Abs. 1 lit. a GDPR. The registration serves the fulfillment of a contract of which the user is the contracting party, thus the additional legal basis for the processing of the data Art. 6 (1) lit. b GDPR.

3. Purpose of data processing

Access to the Cloud Service requires a valid registration. Registration of the user is required to fulfill a contract with the user. The data serve for access protection and the use of all features of the offered service. Individual data cannot be specified by the user. This may reduce the usable scope of service.

4. Duration of storage

The data will be deleted as soon as it is no longer necessary for the purpose of its collection. A semi-automatic deletion takes place no later than 60 days after expiry of the period of use.

5. Opposition and removal possibility

As a user, you have the option to cancel the registration. You can change the data stored about you.

If this is not possible via the user interface of the service, please contact us by e-mail at sales-europe@provisio.com or in writing to the company address.

If the data is required to fulfill a contract or to carry out pre-contractual measures, premature deletion of the data is only possible, if contractual or legal obligations do not preclude deletion.

VIII. Email contact

1. Description and scope of data processing

It is possible to contact the provided e-mail addresses. In this case, the user's personal data transmitted by e-mail will be stored.

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

6. Legal basis for data processing

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

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

7. Purpose of data processing

The processing of the personal data from the online input form 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 information technology systems.

8. Duration of storage

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 input form of the contact form and those sent by e-mail, 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 additional personal data collected during the sending process will be deleted at the latest after a period of seven days.

9. Opposition and removal possibility

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 e-mail, he may object to the storage of his personal data at any time. In such a case, the conversation cannot continue.

For this purpose, please contact us by e-mail at sales-europe@provisio.com or in writing to the company address.

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

IX. Google Analytics

1. Description and scope of data processing

This website uses Google Analytics, a web analytics service provided by Google Inc. ("Google"). Use is made on the basis of Art. 6 para. 1 sentence 1 lit. f. GDPR. Google Analytics uses so-called "cookies", text files that are stored on your computer and that allow an analysis of the use of the website by you. The information generated by the cookie about your use of the website such as

- Browser type / version,
- used operating system,
- Referrer URL (the previously visited page),

- Host name of the accessing computer (IP address),
- Time of server request,

are usually transmitted to a Google server in the US and stored there. The IP address sent to Google Analytics by your browser will not be merged with other Google data. We have also extended Google Analytics on this website with the code "anonymizeIP". This guarantees the masking of your IP address so that all data is collected anonymously. Only in exceptional cases will the full IP address be sent to a Google server in the US and shortened there.

2. Legal basis for data processing

The legal basis for the processing of the data is Art. 6 para. 1 sentence 1 lit. f. GDPR.

3. Purpose of data processing

On behalf of the operator of this website, Google will use this information to evaluate your use of the website, to compile reports on website activity and to provide other services related to website usage and internet usage to the website operator. You can prevent the storage of cookies by a corresponding setting of your browser software; however, we point out that in this case you may not be able to use all the functions of this website to the full extent.

For more information about privacy related to Google Analytics, see the Google Analytics Help Center (<https://support.google.com/analytics/answer/6004245?hl=en>).

4. Duration of storage

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

5. Opposition and removal possibility

The user has the possibility at any time to revoke his consent to the processing of the personal data. In addition, you may prevent the collection by Google of the data generated by the cookie and related to your use of the website (including your IP address) as well as the processing of this data by Google by downloading the browser plug-in available under the following link and install: <http://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 the collection by Google Analytics by clicking on this link. An opt-out cookie will

be set which prevents the future collection of your data when you visit this website. The opt-out cookie is only valid in this browser and only for our website and is stored on your device. If you delete the cookies in this browser, you must set the opt-out cookie again.

[Note. For suggestions on how to use the opt-out cookie, please visit: <https://developers.google.com/analytics/devguides/collection/gajs/?hl=en#disable>].

We continue to use Google Analytics to analyze data from Double-Click and AdWords for statistical purposes. If you do not want to do this, you can disable it through the Ads Preferences Manager (<http://www.google.com/settings/ads/onweb/?hl=en>).

X. YouTube

1. Description and scope of data processing

This website uses plugins from YouTube, a web service of Google Inc. ("Google") for the integration and presentation of video content. Use is made on the basis of Art. 6 para. 1 sentence 1 lit. f. GDPR.

When you visit a page with an integrated YouTube plug-in, it will connect to YouTube's servers. YouTube will find out which of our sites you've visited. YouTube may associate your browsing behavior directly with your personal profile should you be logged into your YouTube account. By logging out beforehand you have the option to prevent this.

2. Legal basis for data processing

The legal basis for the processing of the data is Art. 6 para. 1 sentence 1 lit. f. GDPR.

3. Purpose of the data processing

On behalf of the operator of this site, YouTube will display videos on the website. Before starting the videos, pictures from the videos are already embedded on the website.

For more information about privacy related to Google Analytics, see the Google Analytics Help Center (<https://support.google.com/analytics/answer/6004245?hl=en>).

4. Duration of storage, objection and disposal options

For details on how to handle user information, please refer to the YouTube Privacy Policy at: <https://www.google.de/intl/de/policies/privacy>.

XI. Rights of the person concerned

If your personal data are being processed, you are concerned according the GDPR and you have the following rights to the person responsible:

1. Right to information

You may ask the person in charge to confirm if personal data concerning you is processed by us. If such processing data is available, you can request the following information from the person responsible:

- (1) the purposes for which the personal data are processed;
- (2) the categories of personal data being processed;
- (3) the recipients or categories of recipients to whom the personal data relating to you have been disclosed or are still being disclosed;
- (4) the planned duration of the storage of your personal data or, if specific information is not available, criteria for determining the duration of storage;
- (5) the existence of a right to 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;
- (6) the existence of a right of appeal to a supervisory authority;
- (7) all available information on the source of the data if the personal data is not collected from the data subject;
- (8) the existence of automated decision-making, including profiling, in accordance with Articles 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 is being transmitted to a third country or an international organization. In this connection, you can request the appropriate guarantees in accordance with Art.46 GDPR in connection with the transmission to be informed.

2. Right to rectification

You have a right to rectification and / or completion against the controller in case your personal data that is being processed is incorrect or incomplete. The responsible person must make the correction without delay.

3. Right to restriction of processing

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

- (1) 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;
- (2) the processing is unlawful and you refuse the deletion of the personal data and instead demand the restriction of the use of the personal data;
- (3) the controller no longer needs the personal data for the purposes of processing, but you need it to assert, exercise or defend legal claims; or
- (4) if you have objected to the processing according to Art. 21 (1) GDPR and it is not yet certain whether the legitimate reasons of the person responsible outweigh your reasons.

If the processing of personal data concerning you has been restricted, this data may only be used with your consent or for the purpose of asserting, exercising or defending legal claims or protecting the rights of another natural or legal person or for reasons of important public interest of the Union or a Member State.

If the limitation of the processing according to the above-mentioned conditions is restricted, you will be informed by the person in charge before the restriction is lifted.

4. Right of deletion

a) Obligation to delete

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:

- (1) Personal data concerning you are no longer necessary for the purposes for which they were collected or otherwise processed.

(2) You revoke your consent, on which the data processing is based according to Art. 6 (1) lit. a or Art. 9 para. 2 lit. GDPR and there is no other legal basis for processing.

(3) You file an objection according to Art.21 Abs.1 GDPR to the processing and there are no prior justifiable reasons for processing, or you submit an objection according to Art.21 Abs.2 GDPR to the processing.

(4) Your personal data have been processed unlawfully.

(5) The deletion of personal data concerning you shall be required to fulfill a legal obligation under Union law or the law of the Member States to which the controller is subject.

(6) The personal data relating to you were collected in relation to information society services offered pursuant to Art. 8 (1) GDPR.

b) Information to third parties

If the person in charge has made the personal data concerning you public and is obliged to delete your personal data according to Article 17 (1) of the GDPR, he/she shall take appropriate measures, including technical ones, while taking into account available technology and implementation costs, to inform the data controller who processes the personal data that you, as affected person, are requesting the deletion of all links to such personal data or of copies or replications of such personal data.

c) Exceptions

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

(1) to exercise the right to freedom of expression and information;

(2) 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 carry out a task which is in the public interest or in the exercise of public authority, which has been delegated to the controller;

(3) for reasons of public interest in the field of public health pursuant to Art. 9 (2) lit. h and i as well as Art.9 Abs.3 GDPR;

(4) 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 (a) is

likely to render impossible or seriously affect the achievement of the objectives of that processing, or

(5) to assert, exercise or defend legal claims.

5. Right to information

If you have asserted 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 person responsible to be informed about these recipients.

6. Right to data portability

You have the right to receive personally identifiable information you provide to the controller in a structured, common and machine-readable format. In addition, you have the right to transfer this data to another person without hindrance by the person responsible for providing the personal data, provided that

(1) the processing is based on a consent acc. Art. 6 (1) lit. a GDPR or Art. 9 para. 2 lit. a GDPR or on a contract acc. Art. 6 (1) lit. b GDPR and

(2) the processing is done by automated means.

In exercising this right, you also have the right to obtain that your personal data relating to you are transmitted directly from one person to another, insofar as this is technically feasible. Freedoms and rights of other persons may not be affected.

The right to data portability does not apply to the processing of personal data necessary for the performance of a task in the public interest or in the exercise of official authority delegated to the controller.

7. Contradictory legal

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

The responsible person will no longer process the personal data concerning you unless he can demonstrate compelling legitimate grounds 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. If 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 of information services, of exercising your right to object through automated procedures that use technical specifications.

8. Right to revoke the data protection consent declaration

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.

9. Automated decision on an individual basis including profiling

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

- (1) is required for the conclusion or performance of a contract between you and the responsible entity,
- (2) is permissible on the basis of Union or Member State legislation to which the controller is subject, and that legislation contains adequate measures to safeguard your rights and freedoms and your legitimate interests, or
- (3) with your express consent.

However, these decisions may not be based on special categories of personal data pursuant to Art. 9 para. 1 GDPR, unless Art.9 para.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 person responsible, to express his / her own position and to contest the decision.

10. Right to complain to 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 your residence, place of your work or place of alleged infringement, if you believe that the processing of the personal data concerning you violates the GDPR regulations.

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 Art.78 GDPR.