

# **Privacy Policy**

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# 1) Preamble

Welcome to our website! We take the protection of your data and your privacy very seriously. The purpose of this document is to provide you with information about what types of data we process and when, for what purpose and on what legal basis we process data. In this document, we would like to explain to you how our services work and how we protect your personal data.

In accordance with Article 4 (1) of the GDPR, personal data means all information relating to an identified or identifiable individual. An identifiable natural person is someone who can be identified, either directly or indirectly. For further information, please refer to Article 4 (1) of the GDPR.

This privacy policy is accessible electronically via <a href="https://www.gknpm.com/en/Utilities/privacy-policy/">https://www.gknpm.com/en/Utilities/privacy-policy/</a> and may be downloaded, saved and printed any time.

If we use our legitimate interest or the legitimate interest of a third party as the legal basis for processing your personal data (Article 6 (1) point f) of the GDPR), you have the **right to object** to this processing pursuant to Article 21 of the GDPR:

<u>Under Article 21 of the GDPR, you have the right to object</u> to the processing of your personal data at any time. We shall then no longer process your personal data for purposes of direct marketing or any related profiling.

Likewise, we shall then no longer process your personal data for any other purpose, unless we can demonstrate compelling legitimate reasons for processing that override your interests, rights and freedoms, or unless the processing serves to enforce, exercise or defend legal claims (see Article 21 (1) of the GDPR, the so-called 'Limited right of objection'). In this case, you have to set out the reasons for the objection that relate to your particular situation.

Where personal data is processed for scientific or historical research purposes or statistical purposes pursuant to Article 89 (1) of the GDPR, you have the right to object to the processing of your personal data for reasons relating to your particular situation, unless processing is required to carry out a task for reasons of public interest (see Article 21 (6) of the GDPR).

In the individual sections, we will point out the right to object separately to you (e.g. by saying: "You have the right to object") if this right applies. There you will also find further information on how to exercise your right to object.

In order to keep the following privacy policy transparent, we refer to information and privacy notices on external websites (see also the section "Social Networks & External Links" in this privacy policy) in various places via links. We endeavour to keep the links listed in this privacy statement up to date. Nevertheless, due to the constant updating of the websites, it cannot be excluded that links do not function correctly. Should you notice such a link, we would be pleased if you inform us so that we can include the latest link.



#### 2) Controller

The controller for the processing of personal data within the meaning of Article 4 (7) of the GDPR is:

GKN Sinter Metals Engineering GmbH Krebsöge 10 42477 Radevormwald Germany

#### 3) Contact details of the data protection officer

If you have any questions regarding the processing of your personal data or your rights with respect to data protection, please contact: Datenschutz.pm@nn.gknpm.com

# 4) Log files

Every time you visit our website, we automatically collect data and information from your device's system and store it in so-called 'server log files'. This is data that relates to an identified or identifiable natural person (in this case: website visitors). The data is automatically transmitted by your browser when you visit our website. This following data is collected:

- your IP address
- browser type
- domain names
- internet service provider (ISP)
- files viewed on our site (e.g., HTML pages, graphics, etc.)
- operating system
- clickstream data
- access times and referring website addresses.

We process this data to ensure that our website is accessible from your device, and that it displays correctly on your device or in your browser. In addition, the data is used to optimise the website and to ensure the security of our systems. An evaluation of this data for the purpose of marketing does not take place.

The legal basis for this processing is Article 6 (1) point (f) of the GDPR. We have a legitimate interest in presenting you with a website that is optimised for your browser, and to facilitate communication between our server and your device. The latter, in particular, requires your IP address to be processed.

The information processed shall be stored only for as long as is necessary for the purpose for which it was processed.

The recipient of the data is our server host and our customer relationship management provider ("HubSpot"), who works for us within the framework of a data processing agreement. Further information on "HubSpot" can be found in section 8 of this privacy policy.

#### Right of objection

You have the right to object. You can send or inform us of your objection at any time (e.g. by e-mail to contact@gknpm.com).



The provision of personal data is not a statutory or contractual requirement, nor a requirement necessary to enter into a contract. While you are not under any obligation to provide us with your personal data, if you do not do so, you may not be able to use all the features of the website fully.

#### 5) Cookie Policy

#### 1. Introduction

We use cookies and similar technologies on our website to improve user experience, analyze traffic, and personalize content. Some cookies are essential, while others help us understand site usage or serve relevant advertising.

You can manage your preferences at any time via our Cookie Settings.

- 2. Types of Cookies We Use
- a) Strictly Necessary Cookies

These cookies are essential for website functionality (e.g., managing privacy preferences, form submissions, or session handling). They cannot be switched off.

Cookie Subgroup Cookies Provider OptanonConsent, \_\_epiXSRF, ASP.NET SessionId, www.gknpm.com OptanonAlertBoxClosed First Party Essential b) Performance Cookies

These cookies help us understand how visitors interact with our website by collecting anonymous usage data.

Cookie Subgroup Cookies Provider Type gknpm.com \_gclxxxx, \_gat, \_ga\_xxxxxxxxxxx, \_ga, \_gid, \_gat\_UA-xxxx First Party **Analytics** 

c) Targeting/Advertising Cookies

These cookies are used by advertising partners to build a profile of your interests and display relevant ads on other websites.

Cookie Subgroup Cookies Provider Type gknpm.com gat gtag xxxxxxxxx First Party Advertising youtube.com VISITOR INFO1 LIVE, CONSENT, YSC, VISITOR PRIVACY METADATA Third Party Advertising doubleclick.net test cookie, IDE Third Party Advertising hubspot.com / hsforms.net cf bm, cfuvid Third Party Functional cdn.syndication.twimg.com lang Third Party Functional 3. Managing Your Cookie Preferences

You can manage or withdraw your consent for cookies at any time using the cookie banner or settings page. You can also disable cookies directly in your browser, although some features of the site may not work as intended.

Google Chrome Instructions

Mozilla Firefox Instructions

Apple Safari Instructions

Microsoft Edge Instructions

#### 4. Legal Basis for Processing



We use cookies based on your consent (Article 6(1)(a) GDPR) unless cookies are strictly necessary, in which case they are processed under our legitimate interest (Article 6(1)(f) GDPR).

# 5. Data Transfers and Third-Party Services Some of our service providers (e.g., Google, HubSpot, YouTube) may process data in countries outside the EU/EEA. Where this occurs, we rely on Standard Contractual Clauses (SCCs) to ensure an appropriate level of data protection.

#### 6. Your Rights

You have the right to:

Withdraw consent at any time

Access or correct your personal data

Request deletion or restriction of data processing

Please see our Privacy Policy for full details.

# Right of objection

#### You have the right to object to data processing.

You can restrict the use of cookies or completely disable them in your browser settings. You can also enable the automatic deletion of cookies when you close your browser window.

You can learn more about how to delete cookies in the most common browsers, and about how to change cookie settings etc. here:

Google Chrome: Website

Mozilla Firefox: Website

Apple Safari: Website

Microsoft Internet Explorer: Website

The provision of personal data is not a statutory or contractual requirement, nor a requirement necessary to enter into a contract. While you are not under any obligation to provide us with your personal data, if you do not do so, you may not be able to use all the features of the website fully.

Other services that we use also use cookies. We shall draw your attention separately to the use of cookies when dealing with those individual services.



#### 6) Information about Google services

We use various services from Google LLC. ('Google'), 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA on our website.

You can find more information about each of the specific Google services that we use on this website in another privacy policy.

In some circumstances, embedding Google services means that Google collects and processes information (including personal data). In such cases, we cannot rule out the fact that Google may also transmit the information to a server in a third country.

As outlined in Google's Privacy Shield certification (available at <a href="https://www.privacyshield.gov/list">https://www.privacyshield.gov/list</a> by searching for 'Google'), Google is obligated to comply with the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework with respect to the collection, use and storage of personal data from EU member states, or Switzerland. Through certification, Google, including Google LLC and its wholly owned subsidiaries in the USA declares that it complies with Privacy Shield principles. You can find more information about this at <a href="https://www.google.de/policies/privacy/frameworks/">https://www.google.de/policies/privacy/frameworks/</a>.

We have no influence over the information that Google actually collects and processes. However, Google states that it can generally only process the following information (including personal data):

- protocol data (particularly the IP address);
- location-related information;
- unique application numbers; and
- · cookies and similar technologies.

If you are signed into your Google account, Google may add the processed information to your account, depending on your account settings, and treat it as personal data; also refer particularly to <a href="https://www.google.de/policies/privacy/partners/">https://www.google.de/policies/privacy/partners/</a>.

Among others, Google would like to state the following:

'In some circumstances, we associate personal information from one service with information and personal data from other Google services. We do this to make it easier for you to share content with friends and acquaintances, for example. Depending on your account settings, your activity on other sites and apps may be associated with your personal information in order to improve Google's services and the ads displayed by Google.' (https://www.google.com/intl/de/policies/privacy/index.html)

You can prevent this data from being directly added to your account by signing out of your Google account or changing your account settings accordingly. You can also prevent cookies from being installed - if used by Google - by changing your browser settings accordingly; please note that in this case, you may not be able to use all of this website's features fully.

You can learn more about how to delete cookies in the most common browsers, and about how to change cookie settings etc. here:



- Google Chrome: <a href="https://support.google.com/chrome/answer/95647?hl=de">https://support.google.com/chrome/answer/95647?hl=de</a>
- Mozilla Firefox: <a href="https://support.mozilla.org/de/kb/cookies-loeschen-daten-von-websites-entfernen">https://support.mozilla.org/de/kb/cookies-loeschen-daten-von-websites-entfernen</a>
- Apple Safari: <a href="https://support.apple.com/kb/PH21411?locale=de\_DE">https://support.apple.com/kb/PH21411?locale=de\_DE</a>
- Microsoft Internet Explorer: <a href="https://support.microsoft.com/de-de/help/17442/windows-internet-explorer-delete-manage-cookies">https://support.microsoft.com/de-de/help/17442/windows-internet-explorer-delete-manage-cookies</a>

You can find more information in Google's privacy policies, which can be accessed here:

- https://developers.google.com/terms/
- https://www.google.com/policies/privacy/

You can find information about Google's privacy settings at <a href="https://privacy.google.com/take-control.html">https://privacy.google.com/take-control.html</a>

#### 7) Google Analytics

On our website, we use Google Analytics, a web analysis service provided by Google LLC "("Google"), 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

Google Analytics uses "cookies", which are text files placed on your device, to help the website analyze how users use the site. Google Analytics may also use so-called web beacons (invisible graphics). These web beacons can be used to evaluate information such as visitor traffic to websites. The information generated by cookies and web beacons about the use of our website (including the user's IP address) will be transmitted to and stored by Google on servers in the United States or other third countries. This information can be passed on by Google to Google's contractual partners.

**Information** regarding Google's existing Privacy Shield certification and other relevant information regarding data processing by Google in relation to the use of Google services can be found in this Privacy Policy under the section **"6) Information about Google services"**.

The following data types are processed by Google:

- Online identifiers (including cookie identifiers)
- IP address
- device IDs

In addition, you can find more detailed information about the information processed at <a href="https://www.google.com/intl/de/policies/privacy/#infocollect">https://www.google.com/intl/de/policies/privacy/#infocollect</a> under "Data we receive as a result of your use of our services" and at <a href="https://privacy.google.com/businesses/adsservices/">https://privacy.google.com/businesses/adsservices/</a>

We only use Google Analytics with IP anonymization enabled ("anonymize IP"). This means that your IP address will be shortened by Google within member states of the European Union or in other signatory states to the Agreement on the European Economic Area. Only in exceptional cases the full IP address is transmitted to a Google server in the USA and shortened there.



Furthermore, we have concluded a data processing agreement with Google for the use of Google Analytics (Art. 28 of the GDPR). Google processes the data on our behalf in order to evaluate your use of the website, to compile reports on website activity for us and to provide us with other services associated with website and Internet use. Google may transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf.

The integration of Google Analytics enables us to analyze user behavior on our website and to respond to it. This enables us to continuously improve our services.

The legal basis for this processing is Article 6 (1) point (f) of the GDPR. We have a legitimate interest in the great benefit that the functions described above have for our services. The statistical evaluation of user behaviour enables us, in particular, to react and optimise our offer in line with the interests of our customers.

Google has the right to use subcontractors in the context of the data processing agreement. A list of these subcontractors can be found at <a href="https://privacy.google.com/businesses/subprocessors/">https://privacy.google.com/businesses/subprocessors/</a>

# Right of objection

# You have the right to object to data processing.

You can prevent Google from processing your data by downloading and installing the browser plug-in available at the following link:

https://tools.google.com/dlpage/gaoptout?hl=en

You can also prevent Google Analytics from collecting your data by clicking on the following link. An Opt-Out-Cookie is set, which prevents the future collection of your data when visiting our website: <a href="javascript:gaOptout()">Google Analytics deaktivieren</a>.

Furthermore, you can prevent the collection of data by web beacons by downloading and installing the add-on available under the following link for the respective browser:https://adblockplus.org/

It is also possible to prevent the installation of cookies by making the appropriate settings in your browser; however, we would like to point out that in this case you may not be able to use all the functions of this website to their full extent.

For information on how to delete cookies in the most common browsers and how to change cookie settings, click here:

Google Chrome: Webseite
Mozilla Firefox: Webseite
Apple Safari: Webseite
Microsoft Internet Explorer: Webseite

The processed information is stored for 14 months and automatically deleted at the end of this storage period.



For more information on data processing regarding Google Analytics, please refer to Google's privacy policy:

https://support.google.com/analytics/answer/6004245?hl=de

Information about Google's privacy settings can be found at

https://privacy.google.com/take-control.html?categories\_activeEl=sign-in

The provision of personal data is not a statutory or contractual requirement, nor a requirement necessary to enter into a contract. While you are not under any obligation to provide us with your personal data, if you do not do so, you may not be able to use all the features of the website fully.

# 8) Use of Google Tag Manager

We use Google Tag Manager, a service provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Google Tag Manager allows us to manage and deploy marketing and analytics tags (snippets of code or tracking pixels) on our website through a single interface.

Google Tag Manager itself does not collect personal data. It merely triggers other tags that may, under certain circumstances, collect data. While Google Tag Manager does not access this data, it may record information about tag firing and the domain on which it is used, which helps with tag management and debugging.

The use of Google Tag Manager is essential for the technical operation of our website and the implementation of your privacy preferences.

#### Legal basis:

The legal basis for using Google Tag Manager is our legitimate interest under Art. 6(1)(f) GDPR in enabling a user-friendly and efficient management of tracking technologies on our website.

Where tags managed through Google Tag Manager collect data for purposes such as analytics or advertising, these will only be activated with your explicit consent under Art. 6(1)(a) GDPR. You can manage your consent preferences at any time via our Cookie Settings tool.

#### Right to Object:

You have the right to object to data processing that is based on legitimate interests. You may restrict or disable tag-based tracking by adjusting your cookie settings or browser preferences.

For more information, see Google's privacy policy at: https://policies.google.com/privacy

#### 9) Use of YouTube

We use videos from YouTube and YouTube plug-ins on our website. YouTube is a service of YouTube LLC ('YouTube'), 901 Cherry Ave., San Bruno, CA 94066, USA and is provided by this company. YouTube LLC is a subsidiary of Google Inc. ('Google'), 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

The integration of YouTube is done by embedding the service into our website using 'iFrames'. In some circumstances, YouTube/Google collects and processes information (including personal data) when these iFrames are loaded. In this process, we cannot rule out that YouTube/Google may also transmit this information to a server in a third country.



Information about Google's current Privacy Shield certification and other relevant data concerning data processing by Google as part of using Google services can be found in this privacy policy under the section "6. Information about Google services".

We do not collect any data when you watch a YouTube video on our website.

We use YouTube in the so-called "extended data protection mode". According to the information provided by Google, a video can be played without the user behaviour being recorded by cookies. We do not collect any data ourselves when you watch a YouTube video with us.

By integrating YouTube, we are pursuing the purpose of being able to show you various videos on our website so that you can view these directly on the website.

The legal basis for processing personal data as described above is Article 6 (1) point f) of the GDPR. Our justified legitimate interest lies in the great benefits that YouTube offers. The integration of external videos takes some burden off our servers and enables us to use the freed resources elsewhere. This can, among other things, increase the stability of our servers. YouTube/Google also has a legitimate interest in the collected (personal) data to improve its own services.



#### Right of objection

You have the right to object to data processing. You can send us or communicate to us your objection at any time (e.g. by email to contact@gknpm.com).

You can also change your cookie settings (e.g. delete cookies, block cookies, etc.). Further information on this can be found under section "5) Cookies".

The provision of personal data is not a statutory or contractual requirement, nor a requirement necessary to enter into a contract. While you are not under any obligation to provide us with your personal data, if you do not do so, you may not be able to use all the features of the website fully.

You can find more information in YouTube's/Google's privacy policies, which can be accessed here: www.google.com/policies/privacy/

You can find information about Google's privacy settings at <a href="https://privacy.google.com/take-control.html?categories-activeEl=sign-in">https://privacy.google.com/take-control.html?categories-activeEl=sign-in</a>

#### 10) Use of Adobe Fonts

We use Adobe Fonts, a service provided by Adobe Systems Incorporated, 345 Park Avenue, San Jose, CA 95110-2704, USA. When you visit our website, your browser loads fonts from Adobe servers to display text properly. This request may include your IP address, which Adobe may process for technical and security purposes.

Adobe does not set cookies through Adobe Fonts. For more information, visit Adobe's privacy policy: https://www.adobe.com/privacy/policy.html.

The legal basis for processing is your consent under Art. 6(1)(a) GDPR.

Data may be transferred to the United States. These transfers are safeguarded by Standard Contractual Clauses (SCCs).

You may withdraw consent at any time via our cookie settings.

#### 11) HubSpot and HubSpot Forms

We use services from **HubSpot**, **Inc.**, 25 First Street, 2nd Floor, Cambridge, MA 02141, USA. HubSpot provides a marketing automation platform that supports customer communication, lead generation, and website analytics. This includes form submissions, newsletter signups, CRM integration, and performance tracking.

HubSpot uses infrastructure from both:

- Google Cloud Platform (GCP) in Frankfurt, Germany (EU-based), and
- Amazon Web Services (AWS) in the USA.

While primary data processing occurs in the EU (Frankfurt), data may be transferred to the USA under **Standard Contractual Clauses (SCCs)** to ensure an adequate level of protection.



#### What data is processed

When you interact with forms on our website (e.g., contact or newsletter forms), HubSpot may process the following data:

- Name, email address, company, and other contact details
- IP address and browser/device information
- Referrer URL and timestamps
- Page views and click paths

HubSpot uses cookies and tracking technologies (e.g., hubspotutk, \_hssc, \_hstc) to associate website visits with contacts for marketing and performance purposes. These cookies are only activated **after you provide explicit consent**.

#### **Purpose of Processing**

We use HubSpot to:

- Manage contact forms and CRM data
- Improve our marketing communication
- Analyze website usage (where consent is provided)
- Provide faster and more secure form handling

#### **Legal Basis**

The legal basis for this data processing is your **consent** under **Art. 6(1)(a) GDPR**. For infrastructure performance and security purposes (e.g., uptime, load distribution), processing may also be based on **legitimate interest** under **Art. 6(1)(f) GDPR**.

#### **Right to Withdraw Consent**

You may withdraw your consent to HubSpot tracking at any time by adjusting your <u>cookie</u> <u>settings</u>.

You may also block HubSpot cookies via your browser or use this opt-out mechanism: Click here to opt-out of HubSpot tracking (set HubSpot opt-out cookie)

#### **Data Transfers**

Data may be transferred to HubSpot servers in the United States. These transfers are protected by **Standard Contractual Clauses** approved by the European Commission. Further details are available at:

https://legal.hubspot.com/dpa

#### Retention

HubSpot stores your data only as long as necessary for the purposes described, or as required by law.

#### **More Information**

For more about HubSpot's data processing and compliance, visit: https://legal.hubspot.com/privacy-policy



#### Right of objection

You have the right to object. You can send or inform us of your objection at any time (e.g. by e-mail to contact@gknpm.com).

- User accounts
- newsletter provider
- contact form
- Google Analytics (section 7)

The data collected by HubSpot is transmitted to Google for analysis. The legal basis for the transfer is Article 6 (1) point f) of the GDPR. The purpose of the transfer is the analysis for marketing purposes. HubSpot has a legitimate interest in the transmission for the improvement and optimization of the services.

# Right of objection

You have the right to object. You can send or inform us of your objection at any time (e.g. by e-mail to contact@gknpm.com).

As can be seen from HubSpot's Privacy Shield certification (to be found at https://www.privacyshield.gov/list under the search term "HubSpot"), HubSpot has obligated to comply with the EU-US Privacy Shield Framework published by the US Department of Commerce and the Swiss-US Privacy Shield Framework on the collection, use and storage of personal data from the member states of the EU and Switzerland respectively. HubSpot has declared by certification that it complies with the Privacy Shield principles.

<u>Information</u> on the existing privacy shield certification of HubSpot and other relevant data on data processing by HubSpot within the scope of using HubSpot can be found at:

- https://www.privacyshield.gov/participant?id=a2zt0000000TN8pAAG&status=Active
- https://legal.hubspot.com/legal-stuff?hsLang=fr

You can also find more detailed information about HubSpot on their websites https://www.hubspot.com/ and at https://legal.hubspot.com/privacy-policy?\_ga=2.3730290.37890199.1552980835-

511272210.1549970169&\_gac=1.216713890.1552561725.EAlalQobChMl37mbjb-B4QIVC853Ch3C5Qp5EAAYASAAEglJzvD\_BwE.

Furthermore, we have concluded a data processing agreement for the use of Hubspot with HubSpot (Article 28 of the GDPR). HubSpot processes the data on our behalf in order to trigger the stored tags and display the services on our website. HubSpot may transfer this information to third parties if required to do so by law or if third parties process this data on behalf of HubSpot.

If you have deactivated individual tracking services (e.g. by setting an opt-out cookie), the deactivation will continue for all affected tracking tags that are integrated by HubSpot.

Through the integration of HubSpot, we pursue the purpose of being able to carry out a simplified and clear integration of various services. In addition, the integration of HubSpot optimizes the loading times of the various services.

The legal basis for the processing of personal data described here is Article 6 (1) point f) of the GDPR. Our justified interest in this is the great benefit that the integration of various services via the HubSpot brings. By integrating HubSpot, we reduce our maintenance effort as well as



the loading effort of the website and the server and traffic load. In addition, HubSpot has a justified interest in the collected (personal) data in order to improve its own services.

#### Right of objection

# You have the right to object.

You have the option of preventing all HubSpot tags from being sent. All you have to do is click on this opt-out link to save the HubSpot\_hs\_opt\_out cookie in your browser.

However, we would like to point out that deactivation may result in you not being able to use our website or not being able to use it to its full extent.

The processed information will only be stored as long as it is necessary or legally required for the intended purpose.

The provision of personal data is neither required by law nor by contract and is also not necessary for the conclusion of a contract. They are also not obliged to provide the personal data. Failure to do so may, however, result in you not being able to use our website or not being able to use it to its full extent.

#### 12) Newsletter

You have the possibility to subscribe to our newsletter on our website.

To send the newsletter we use the HubSpot newsletter service. Provider is HubSpot, Inc. ("HubSpot"), 25 First Street, 2nd Floor Cambridge, MA 02141, USA. HubSpot is a service with which, among other things, the dispatch of newsletters can be organized and analyzed.

If you enter data for the purpose of subscribing to the newsletter (e-mail address), this data is processed on the servers of the Google Cloud Platform (Frankfurt a. M.) and stored by AWS in the USA.

HubSpot is Privacy-Shield certified, more information about HubSpot can be found in section 8 of this privacy policy.

In addition, we have concluded a "Data Processing Agreement" with HubSpot. This is a contract in which HubSpot undertakes to protect the data of our users, to process the data exclusively in accordance with the data protection regulations on our behalf and in accordance with our instructions. Further information can be found at: https://legal.hubspot.com/dpa

If you register for our newsletter, we process the following information (also personal data) from you:

- E-mail address
- First name and surname

In order to be able to display the proof of consent and the proof of subscription in a legally compliant manner, we keep the following data on the events entry, change, confirmation and subscription of the newsletter for each user profile which is generated with an e-mail address confirmed by the double opt-in procedure:

- Date and time
- IP address
- opt-in status



- lead status
- lifecycle status

In addition, we process the following information (also personal data) from you within the scope of your use of our newsletter:

- Object and profile reference
- email address
- Date and time
- IP address
- Action type (entry, update)
- permission change
- Metadata of the action

The data is processed by HubSpot and - if available - subcontractors of HubSpot within the scope of data processing. Subcontractors process the data according to instructions and on our behalf in the same way as HubSpot itself.

With the help of the HubSpot service, we analyze the success and reach of our newsletters (campaigns) by click, source and identity tracking. With click tracking, we track how many times each link in our email is clicked. With source tracking, we identify the origin of traffic to our website by adding tags to our email links to ensure proper source attribution. With identity tracking we recognize contacts that have visited our site before and we can track their pages views and site activity.

For this purpose, HubSpot uses and stores cookies, for example, to enable statistical surveys and to build up interest profiles. It is possible for us to understand how you react to individual newsletters from us (e.g. whether you have opened the newsletter).

When registering for the newsletter, you consent to the processing of your personal data (Article 6 (1) point a) of the GDPR), whereby we secure the registration by means of a double opt-in procedure:

In a first step, you enter the mandatory information (e.g. e-mail address) and consent to the processing of your personal data by activating the appropriate box. In a second step, you will then automatically receive an e-mail with a confirmation or activation link, which you should also confirm or activate. This will ensure that the email address you enter on our website is yours.

The collection and processing of the user's e-mail address serves the purpose of delivering the newsletter. The collection and processing of further personal data as part of the registration process has the purpose of preventing misuse of our newsletter or the e-mail address used. In addition, the processing described above serves to enable us to prove that we have received your consent.

The purpose of processing cookie and measurement data is to track the success and reach of our newsletters.

Legal basis for the processing of personal data, which is necessary for the technical provision of the newsletter to you, as well as for the processing of cookie and measurement data is your consent according to Article 6 (1) point a) of the GDPR.

The legal basis for the processing of further personal data is our legitimate interest pursuant to Article 6 (1) point f) of the GDPR. We have a legitimate interest in being able to prove that



you have given us your consent. In addition, we have a legitimate interest in being able to prevent or prove misuse of our newsletter.

#### Your rights:

# 1. Right of withdrawal

#### Right of withdrawal

You have the right to revoke your consent at any time without affecting the legality of the processing carried out on the basis of your consent until revocation. You can send or inform us of your revocation of consent at any time (e.g. by e-mail to contact@gknpm.com).

You can also exercise your consent simply by clicking on the appropriate link in our newsletter.

# 2. right of objection

If the processing of your data is not covered by the consent (especially protocol files), **you** have the right to object.

# Right of objection

You can send or inform us of your objection at any time (e.g. by e-mail to contact@gknpm.com).

The data will be deleted as soon as they are no longer required for the purpose of their collection. Your registration data will therefore only be stored as long as the newsletter subscription is active. Tracking and cookie data are deleted after 13 months.

The data will be deleted if you so wish. You can send an e-mail to contact@gknpm.com to do this.

If you do not confirm the e-mail as part of the double opt-in procedure, your registration will be automatically deleted after 72 hours.

The provision of personal data is neither required by law nor by contract and is also not necessary for the conclusion of a contract. You are also not obliged to provide the personal data. Failure to do so, however, would mean that we would not be able to provide you with a newsletter.

#### 13) Contact form

On our website you will find a contact form which you can use to contact us electronically. If you contact us via this contact form, the data entered in the input fields will be processed by

This includes the following data as mandatory data:

- E-mail address
- The information that is derived from the message text

In addition, you can add further data as voluntary information. This may simplify and speed up the processing of your request. The following data are potentially affected:

- Salutation
- First name
- Surname
- Telephone number



- Company and
- Street and house number
- Postcode and city
- The information that is derived from the message text

Mandatory and voluntary information are treated equally by us. The mandatory information is necessary in order to contact you and process your request.

The following data will also be processed when the message is sent:

- Your IP address
- Date and time of sending

Please note that the extent of the personal data collected in the contact form also depends on which data you yourself disclose in the contact form in the message text.

The purpose of processing personal data within the scope of mandatory and voluntary information is to process the contact request and to be able to contact the requesting party in order to answer the request. The other personal data processed during sending (IP address, date and time of sending) serve to prevent misuse of our contact form.

The legal basis for the processing of the personal data provided by you is your express consent pursuant to Article 6 (1) point a) of the GDPR.

The legal basis for the processing of further personal data is our legitimate interest pursuant to Article 6 (1) point f) of the GDPR. We have a legitimate interest in being able to prove that you have given us your consent. In addition, we have a legitimate interest in being able to prevent or prove misuse of our contact form.

The data will only be processed as long as this is necessary for the provision of the function.

The recipient of the data is our custom relation management provider HubSpot, who works for us within the framework of a data processing agreement.

### Your rights:

#### 1. Right of revocation

#### Right of withdrawal

You have the right to revoke your consent at any time without affecting the legality of the processing carried out on the basis of your consent until revocation.

You can send or inform us of your revocation of consent at any time (e.g. by e-mail to contact@gknpm.com). You can also revoke your consent simply by clicking on the appropriate link in our confirmation e-mail or reply e-mail.

#### 2. Right of objection

If the processing of your data is not covered by the consent (especially log files), **you have** the right to object.

#### Right of objection

You can send us your objection at any time (e.g. by e-mail to contact@gknpm.com).



The provision of personal data is neither required by law nor by contract and is not necessary for the conclusion of a contract. You are also not obliged to provide personal data. Failure to do so may, however, result in you not being able to use our contact form.

#### 14) Contacting us by post, telephone, fax or e-mail

There is the option of contacting us by post, telephone, fax or e-mail.

If you contact us by post, we may in particular process your address data (e.g. surname, first name, street, place of residence, postal code), date and time of receipt of the mail as well as any data resulting from your letter itself.

If you contact us by telephone, we may in particular process your telephone number and, if necessary, your name, e-mail address, time of call and details of your request within the framework of the conversation.

If you contact us by fax, we can in particular process the fax number or the sender identification as well as the data resulting from the fax.

If you contact us by e-mail, your e-mail address, the time of the e-mail and the data resulting from the message text (including attachments, if applicable) will be processed.

The purpose of processing the above-mentioned data is to process the contact request and to be able to contact the requesting party in order to answer the request.

The legal basis for the processing of personal data described here is Art. 6 Para. 1 lit. f) of the GDPR. It is our legitimate interest to give you the opportunity to contact us at any time and to answer your questions.

Personal data will be deleted as soon as they are no longer required for the purpose for which they were collected.

#### Right of objection

You have the right to object to data processing. You can send us or communicate to us your objection at any time (e.g. by email to contact@gknpm.com).

The provision of personal data is not a statutory or contractual requirement, nor a requirement necessary to enter into a contract. While you are not under any obligation to provide us with your personal data, if you do not do so, you may not be able to use all the features of the website fully.

#### 15) Social Networks & External Links

In addition to this website, we also maintain presences in various social media, which you can reach via the corresponding buttons on our website. If you visit such a presence, personal data may be transmitted to the provider of the social network.



Please note that user data is hereby transferred to a server in a third country and can therefore be processed outside the European Union. US providers who are certified under the Privacy Shield have committed themselves to comply with EU data protection standards. Further information can be found at <a href="https://www.privacyshield.gov/Program-Overview">https://www.privacyshield.gov/Program-Overview</a>.

It is possible that in addition to the storage of the data you have specifically entered in this social medium, other information may also be processed by the social network provider.

In addition, the social network provider may process the most important information about the computer system from which you visit it, such as your IP address, the type of processor you are using, and the browser version and plug-ins you are using.

If you are logged in with your personal user account of the respective network during the visit of such a website, this network can assign the visit to this account.

The purpose and scope of the data collection by the respective medium and the further processing of your data there as well as your rights in this regard can be found in the respective regulations of the respective controller, e.g. below:

#### Facebook (Facebook, Inc., 1 Hacker Way, Menlo Park, CA 94025, USA):

- For fanpages: Agreement on joint processing of personal data (Art. 26 (1) of the GDPR) <a href="https://www.facebook.com/legal/terms/page\_controller\_addendum">https://www.facebook.com/legal/terms/page\_controller\_addendum</a>
- o Privacy policy: <a href="https://www.facebook.com/about/privacy/">https://www.facebook.com/about/privacy/</a>,
- Opt-Out possibility t: <a href="https://www.facebook.com/settings?tab=ads">https://www.facebook.com/settings?tab=ads</a> und http://www.youronlinechoices.com/,
- Privacy Shield certification : https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status= Active

#### Twitter (Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA):

- o Privacy policy: <a href="https://twitter.com/de/privacy">https://twitter.com/de/privacy</a>
- o Opt-Out possibility:: <a href="https://twitter.com/personalizatio">https://twitter.com/personalizatio</a>,
- Privacy Shield certification : <a href="https://www.privacyshield.gov/participant?id=a2zt0000000TORzAAO&status="https://www.privacyshield.gov/participant?id=a2zt0000000TORzAAO&status="https://www.privacyshield.gov/participant?id=a2zt0000000TORzAAO&status="https://www.privacyshield.gov/participant?id=a2zt0000000TORzAAO&status="https://www.privacyshield.gov/participant?id=a2zt0000000TORzAAO&status="https://www.privacyshield.gov/participant?id=a2zt0000000TORzAAO&status="https://www.privacyshield.gov/participant?id=a2zt0000000TORzAAO&status="https://www.privacyshield.gov/participant?id=a2zt0000000TORzAAO&status="https://www.privacyshield.gov/participant?id=a2zt0000000TORzAAO&status="https://www.privacyshield.gov/participant">https://www.privacyshield.gov/participant?id=a2zt00000000TORzAAO&status="https://www.privacyshield.gov/participant">https://www.privacyshield.gov/participant?id=a2zt00000000TORzAAO&status="https://www.privacyshield.gov/participant">https://www.privacyshield.gov/participant?id=a2zt00000000TORzAAO&status="https://www.privacyshield.gov/participant">https://www.privacyshield.gov/participant</a>

# Google und YouTube (Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA):

- o Privacy policy: https://policies.google.com/privacy,
- o Opt-Out possibility:: <a href="https://adssettings.google.com/authenticated">https://adssettings.google.com/authenticated</a>,
- Instagram (Instagram Inc., 1601 Willow Road, Menlo Park, CA, 94025, USA):
  - Privacy policy and opt-out option: https://help.instagram.com/155833707900388

#### LinkedIn Corporation (700 E Middlefield Rd, Mountain View, CA 94043, USA)

 Privacy policy: https://www.linkedin.com/legal/privacy-policy?trk=uno-regguest-home-privacy-policy



 Privacy Shield certification : https://www.privacyshield.gov/participant?id=a2zt0000000L0UZAA0

We would also like to point out that our website contains further links to external external websites, whereby we have no influence on the processing of data on these external websites.

#### 16) Data security

We use technical and organizational measures to protect our website and other systems against loss, destruction, access, modification, or distribution of your data by unauthorized persons. Notwithstanding our best efforts, data security and protection against all risks cannot be fully guaranteed.

#### 17) Amendments to the privacy policy

We may have to amend our privacy policy to reflect changes in the law or changes in our internal processes.

If we have to amend our privacy policy on this basis, we shall communicate this to you with the subject line: 'Privacy policy'.

#### 18) Withdrawal

You have the right to withdraw your consent with future effect at any time, without affecting the legality of the processing done before withdrawal and based on your consent.

#### 19) Data subject rights

As a data subject, you have the following rights:

- right of access (Article 15 of the GDPR);
- right to rectification of data (Article 16 of the GDPR);
- right of objection (Article 21 of the GDPR);
- right to erasure (Article 17 of the GDPR);
- right to restriction of processing (Article 18 et seq. of the GDPR); and
- right to data portability (Article 20 of the GDPR).

If you have any questions regarding your rights, please contact <a href="mailto:Datenschutz.pm@nn.gknpm.com">Datenschutz.pm@nn.gknpm.com</a> Please note that in this case, we have to ensure that we are dealing with the actual data subject.

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority.

We do not use automated decision-making on our website.

Radevormwald, 25.07.2019