

Privacy Policy

1. An overview of data protection

General information

The following information will provide you with an easy to navigate overview of what will happen with your personal data when you visit this website. The term “personal data” comprises all data that can be used to personally identify you. For detailed information about the subject matter of data protection, please consult our Data Protection Declaration, which we have included beneath this copy.

Data recording on this website

Who is the responsible party for the recording of data on this website (i.e. the “controller”)?

The data on this website is processed by the operator of the website, whose contact information is available under section “Information Required by Law” on this website.

How do we record your data?

We collect your data as a result of your sharing of your data with us. This may, for instance be information you enter into our contact form.

Other data shall be recorded by our IT systems automatically or after you consent to its recording during your website visit. This data comprises primarily technical information (e.g. web browser, operating system or time the site was accessed). This information is recorded automatically when you access this website.

What are the purposes we use your data for?

A portion of the information is generated to guarantee the error free provision of the website. Other data may be used to analyse your user patterns.

What rights do you have as far as your information is concerned?

You have the right to receive information about the source, recipients and purposes of your archived personal data at any time without having to pay a fee for such disclosures. You also

have the right to demand that your data are rectified or eradicated. If you have consented to data processing, you have the option to revoke this consent at any time, which shall affect all future data processing. Moreover, you have the right to demand that the processing of your data be restricted under certain circumstances. Furthermore, you have the right to log a complaint with the competent supervising agency.

Please do not hesitate to contact us at any time under the address disclosed in section “Information Required by Law” on this website if you have questions about this or any other data protection related issues.

Analysis tools and tools provided by third parties

There is a possibility that your browsing patterns will be statistically analysed when you visit this website. Such analyses are performed primarily with cookies and with what we refer to as analysis programmes.

For detailed information about these analysis programmes please consult our Data Protection Declaration below.

2. Hosting and Content Delivery Networks (CDN)

External Hosting

This website is hosted by an external service provider (host). Personal data collected on this website are stored on the servers of the host. These may include, but are not limited to, IP addresses, contact requests, metadata and communications, contract information, contact information, names, web page access, and other data generated through a web site.

The host is used for the purpose of fulfilling the contract with our potential and existing customers (Art. 6 para. 1 lit. b GDPR) and in the interest of secure, fast and efficient provision of our online services by a professional provider (Art. 6 para. 1 lit. f GDPR).

Our host will only process your data to the extent necessary to fulfil its performance obligations and to follow our instructions with respect to such data.

Execution of a contract data processing agreement

In order to guarantee processing in compliance with data protection regulations, we have concluded an order processing contract with our host.

3. General information and mandatory information

Data protection

The operators of this website and its pages take the protection of your personal data very seriously. Hence, we handle your personal data as confidential information and in compliance with the statutory data protection regulations and this Data Protection Declaration.

Whenever you use this website, a variety of personal information will be collected. Personal data comprises data that can be used to personally identify you. This Data Protection Declaration explains which data we collect as well as the purposes we use this data for. It also explains how, and for which purpose the information is collected.

We herewith advise you that the transmission of data via the Internet (i.e. through e-mail communications) may be prone to security gaps. It is not possible to completely protect data against third party access.

Information about the responsible party (referred to as the “controller” in the GDPR)

The data processing controller on this website is:

Avison Young - Germany GmbH
Neue Mainzer Straße 28
60311 Frankfurt am Main
Germany

Phone: +49 (0)69 962 443 0

E-mail: germany.info@avisonyoung.com

The controller is the natural person or legal entity that single-handedly or jointly with others makes decisions as to the purposes of and resources for the processing of personal data (e.g. names, e-mail addresses, etc.).

Designation of a data protection officer as mandated by law

We have appointed a data protection officer for our company.

ECE Expert Computer Equipment GmbH

Marc Halbig

Dillinger Str. 36

61381 Friedrichsdorf

Phone: +49 69 264 888 222

E-mail: marc.halbig@ece24.net

Revocation of your consent to the processing of data

A wide range of data processing transactions are possible only subject to your express consent. You can also revoke at any time any consent you have already given us. To do so, all you are required to do is sent us an informal notification via e-mail. This shall be without prejudice to the lawfulness of any data collection that occurred prior to your revocation.

Right to object to the collection of data in special cases; right to object to direct advertising (Art. 21 GDPR)

IN THE EVENT THAT DATA ARE PROCESSED ON THE BASIS OF ART. 6 SECT. 1 LIT. E OR F GDPR, YOU HAVE THE RIGHT TO AT ANY TIME OBJECT TO THE PROCESSING OF YOUR PERSONAL DATA BASED ON GROUNDS ARISING FROM YOUR UNIQUE SITUATION. THIS ALSO APPLIES TO ANY PROFILING BASED ON THESE PROVISIONS. TO DETERMINE THE LEGAL BASIS, ON WHICH ANY PROCESSING OF DATA IS BASED, PLEASE CONSULT THIS DATA PROTECTION DECLARATION. IF YOU LOG AN OBJECTION, WE WILL NO LONGER PROCESS YOUR AFFECTED PERSONAL DATA, UNLESS WE ARE IN A POSITION TO PRESENT COMPELLING PROTECTION WORTHY GROUNDS FOR THE PROCESSING OF YOUR DATA, THAT OUTWEIGH YOUR INTERESTS, RIGHTS AND FREEDOMS OR IF THE PURPOSE OF THE PROCESSING IS THE CLAIMING, EXERCISING OR DEFENCE OF LEGAL ENTITLEMENTS (OBJECTION PURSUANT TO ART. 21 SECT. 1 GDPR).

IF YOUR PERSONAL DATA IS BEING PROCESSED IN ORDER TO ENGAGE IN DIRECT ADVERTISING, YOU HAVE THE RIGHT TO AT ANY TIME OBJECT TO THE PROCESSING OF YOUR AFFECTED PERSONAL DATA FOR THE PURPOSES OF SUCH ADVERTISING. THIS ALSO APPLIES

TO PROFILING TO THE EXTENT THAT IT IS AFFILIATED WITH SUCH DIRECT ADVERTISING. IF YOU OBJECT, YOUR PERSONAL DATA WILL SUBSEQUENTLY NO LONGER BE USED FOR DIRECT ADVERTISING PURPOSES (OBJECTION PURSUANT TO ART. 21 SECT. 2 GDPR).

Right to log a complaint with the competent supervisory agency

In the event of violations of the GDPR, data subjects are entitled to log a complaint with a supervisory agency, in particular in the member state where they usually maintain their domicile, place of work or at the place where the alleged violation occurred. The right to log a complaint is in effect regardless of any other administrative or court proceedings available as legal recourses.

Right to data portability

You have the right to demand that we hand over any data we automatically process on the basis of your consent or in order to fulfil a contract be handed over to you or a third party in a commonly used, machine readable format. If you should demand the direct transfer of the data to another controller, this will be done only if it is technically feasible.

SSL and/or TLS encryption

For security reasons and to protect the transmission of confidential content, such as purchase orders or inquiries you submit to us as the website operator, this website uses either an SSL or a TLS encryption programme. You can recognise an encrypted connection by checking whether the address line of the browser switches from “http://” to “https://” and also by the appearance of the lock icon in the browser line.

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

Information about, rectification and eradication of data

Within the scope of the applicable statutory provisions, you have the right to at any time demand information about your archived personal data, their source and recipients as well as the purpose of the processing of your data. You may also have a right to have your data rectified or eradicated. If you have questions about this subject matter or any other questions about personal data, please do not hesitate to contact us at any time at the address provided in section “Information Required by Law.”

Right to demand processing restrictions

You have the right to demand the imposition of restrictions as far as the processing of your personal data is concerned. To do so, you may contact us at any time at the address provided in section “Information Required by Law.” The right to demand restriction of processing applies in the following cases:

- In the event that you should dispute the correctness of your data archived by us, we will usually need some time to verify this claim. During the time that this investigation is ongoing, you have the right to demand that we restrict the processing of your personal data.
- If the processing of your personal data was/is conducted in an unlawful manner, you have the option to demand the restriction of the processing of your data in lieu of demanding the eradication of this data.
- If we do not need your personal data any longer and you need it to exercise, defend or claim legal entitlements, you have the right to demand the restriction of the processing of your personal data instead of its eradication.
- If you have raised an objection pursuant to Art. 21 Sect. 1 GDPR, your rights and our rights will have to be weighed against each other. As long as it has not been determined whose interests prevail, you have the right to demand a restriction of the processing of your personal data.
- If you have restricted the processing of your personal data, these data – with the exception of their archiving – may be processed only subject to your consent or to claim, exercise or defend legal entitlements or to protect the rights of other natural persons or legal entities or for important public interest reasons cited by the European Union or a member state of the EU.

4. Recording of data on this website

Cookies

Our websites and pages use what the industry refers to as “cookies.” Cookies are small text files that do not cause any damage to your device. They are either stored temporarily for the duration of a session (session cookies) or they are permanently archived on your device (permanent cookies). Session cookies are automatically deleted once you terminate your

visit. Permanent cookies remain archived on your device until you actively delete them or they are automatically eradicated by your web browser.

In some cases it is possible that third party cookies are stored on your device once you enter our site (third party cookies). These cookies enable you or us to take advantage of certain services offered by the third party (e.g. cookies for the processing of payment services).

Cookies have a variety of functions. Many cookies are technically essential since certain website functions would not work in the absence of the cookies (e.g. the shopping cart function or the display of videos). The purpose of other cookies may be the analysis of user patterns or the display of promotional messages.

Cookies, which are required for the performance of electronic communication transactions (required cookies) or for the provision of certain functions you want to use (functional cookies, e.g. for the shopping cart function) or those that are necessary for the optimization of the website (e.g. cookies that provide measurable insights into the web audience), shall be stored on the basis of Art. 6 Sect. 1 lit. f GDPR, unless a different legal basis is cited. The operator of the website has a legitimate interest in the storage of cookies to ensure the technically error free and optimized provision of the operator's services. If your consent to the storage of the cookies has been requested, the respective cookies are stored exclusively on the basis of the consent obtained (Art. 6 Sect. 1 lit. a GDPR); this consent may be revoked at any time.

You have the option to set up your browser in such a manner that you will be notified any time cookies are placed and to permit the acceptance of cookies only in specific cases. You may also exclude the acceptance of cookies in certain cases or in general or activate the delete function for the automatic eradication of cookies when the browser closes. If cookies are deactivated, the functions of this website may be limited.

In the event that third party cookies are used or if cookies are used for analytical purposes, we will separately notify you in conjunction with this Data Protection Policy and, if applicable, ask for your consent.

Server log files

The provider of this website and its pages automatically collects and stores information in so-called server log files, which your browser communicates to us automatically. The information comprises:

- The type and version of browser used
- The used operating system
- Referrer URL
- The hostname of the accessing computer
- The time of the server inquiry
- The IP address
- This data is not merged with other data sources.

This data is recorded on the basis of Art. 6 Sect. 1 lit. f GDPR. The operator of the website has a legitimate interest in the technically error free depiction and the optimization of the operator's website. In order to achieve this, server log files must be recorded.

Contact form

If you submit inquiries to us via our contact form, the information provided in the contact form as well as any contact information provided therein will be stored by us in order to handle your inquiry and in the event that we have further questions. We will not share this information without your consent.

The processing of these data is based on Art. 6 para. 1 lit. b GDPR, if your request is related to the execution of a contract or if it is necessary to carry out pre-contractual measures. In all other cases the processing is based on our legitimate interest in the effective processing of the requests addressed to us (Art. 6 Para. 1 lit. f GDPR) or on your agreement (Art. 6 Para. 1 lit. a GDPR) if this has been requested.

The information you have entered into the contact form shall remain with us until you ask us to eradicate the data, revoke your consent to the archiving of data or if the purpose for which the information is being archived no longer exists (e.g. after we have concluded our response to your inquiry). This shall be without prejudice to any mandatory legal provisions – in particular retention periods.

Request by e-mail, telephone or fax

If you contact us by e-mail, telephone or fax, your request, including all resulting personal data (name, request) will be stored and processed by us for the purpose of processing your request. We do not pass these data on without your consent.

These data are processed on the basis of Art. 6 Sect. 1 lit. b GDPR if your inquiry is related to the fulfillment of a contract or is required for the performance of pre-contractual measures. In all other cases, the data are processed on the basis of our legitimate interest in the effective handling of inquiries submitted to us (Art. 6 Sect. 1 lit. f GDPR) or on the basis of your consent (Art. 6 Sect. 1 lit. a GDPR) if it has been obtained.

The data sent by you to us via contact requests remain with us until you request us to delete, revoke your consent to the storage or the purpose for the data storage lapses (e.g. after completion of your request). Mandatory statutory provisions - in particular statutory retention periods - remain unaffected.

5. Social media

Twitter plug-in

We have integrated functions of the social media platform Twitter into this website. These functions are provided by Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA. While you use Twitter and the “Re-Tweet” function, websites you visit are linked to your Twitter account and disclosed to other users. During this process, data are transferred to Twitter as well. We must point out, that we, the providers of the website and its pages do not know anything about the content of the data transferred and the use of this information by Twitter. For more details, please consult Twitter’s Data Privacy Declaration at: <https://twitter.com/en/privacy>.

The use of Twitter plug-ins is based on Art. 6 Sect. 1 lit. f GDPR. The operator of the website has a legitimate interest in being as visible as possible on social media. If a respective declaration of consent has been obtained, the data shall be processed exclusively on the basis of Art. 6 Sect. 1 lit. a GDPR. This declaration of consent may be revoked at any time.

You have the option to reset your data protection settings on Twitter under the account settings at <https://twitter.com/account/settings>.

6. Analysis tools and advertising

Google Analytics

This website uses functions of the web analysis service Google Analytics. The provider of this service is Google Ireland Limited (“Google”), Gordon House, Barrow Street, Dublin 4, Ireland.

Google Analytics uses so-called cookies. Cookies are text files, which are stored on your computer and that enable an analysis of the use of the website by users. The information generated by cookies on your use of this website is usually transferred to a Google server in the United States, where it is stored.

The storage of Google Analytics cookies and the utilization of this analysis tool are based on Art. 6 Sect. 1 lit. f GDPR. The operator of this website has a legitimate interest in the analysis of user patterns to optimize both, the services offered online and the operator’s advertising activities. If a corresponding agreement has been requested (e.g. an agreement to the storage of cookies), the processing takes place exclusively on the basis of Art. 6 para. 1 lit. a GDPR; the agreement can be revoked at any time.

Browser plug-in

You do have the option to prevent the archiving of cookies by making pertinent changes to the settings of your browser software. However, we have to point out that in this case you may not be able to use all of the functions of this website to their fullest extent. Moreover, you have the option prevent the recording of the data generated by the cookie and affiliated with your use of the website (including your IP address) by Google as well as the processing of this data by Google by downloading and installing the browser plug-in available under the following link:

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

Objection to the recording of data

You have the option to prevent the recording of your data by Google Analytics by clicking on the following link. This will result in the placement of an opt out cookie, which prevents the recording of your data during future visits to this website: 9 / 12 Google Analytics deactivation. For more information about the handling of user data by Google Analytics,

please consult Google's Data Privacy Declaration at:

<https://support.google.com/analytics/answer/6004245?hl=en>.

Archiving period

Data on the user or incident level stored by Google linked to cookies, user IDs or advertising IDs (e.g. DoubleClick cookies, Android advertising ID) will be anonymized or deleted after 14 month. For details please click the following link:

<https://support.google.com/analytics/answer/7667196?hl=en>

7. Pardot Marketing Automation System (Pardot MAS)

This website uses the Pardot Marketing Automation System ("Pardot MAS") from Pardot LLC, 950 East Paces Ferry Road, Suite 3300 Atlanta, GA 30326, USA. Pardot MAS is a special software for recording and analyzing the movement profiles of website visitors. Insofar as Pardot LLC processes personal data, the processing takes place exclusively on our behalf and in accordance with our instructions.

Pardot LLC participates in the Safe Harbor program of the US Department of Commerce. For more information on how Pardot LLC handles personal information from the European Union, visit www.pardot.com/company/legal/safe-harbor-notice/.

Pardot MAS uses so-called "cookies", text files that are stored on users' computers and that allow an analysis of the use of the website by them. You can prevent the storage of cookies at any time by configuring your Internet browser so that cookies of the domain "pardot.com" are not accepted. However, this may result in some limitations in the features and usability of our offering.

8. Newsletter

Newsletter data

If you would like to subscribe to the newsletter offered on this website, we will need from you an e-mail address as well as information that allow us to verify that you are the owner of the e-mail address provided and consent to the receipt of the newsletter. No further data shall be collected or shall be collected only on a voluntary basis. We shall use such data only for the sending of the requested information and shall not share such data with any third parties.

The processing of the information entered into the newsletter subscription form shall occur exclusively on the basis of your consent (Art. 6 Sect. 1 lit. a GDPR). You may revoke the consent you have given to the archiving of data, the e-mail address and the use of this information for the sending of the newsletter at any time, for instance by clicking on the “Unsubscribe” link in the newsletter. This shall be without prejudice to the lawfulness of any data processing transactions that have taken place to date.

The data deposited with us for the purpose of subscribing to the newsletter will be stored by us until you unsubscribe from the newsletter or the newsletter service provider and deleted from the newsletter distribution list after you unsubscribe from the newsletter. Data stored for other purposes with us remain unaffected.

After you unsubscribe from the newsletter distribution list, your e-mail address may be stored by us or the newsletter service provider in a blacklist to prevent future mailings. The data from the blacklist is used only for this purpose and not merged with other data. This serves both your interest and our interest in complying with the legal requirements when sending newsletters (legitimate interest within the meaning of Art. 6 para. 1 lit. f GDPR). The storage in the blacklist is indefinite. **You may object to the storage if your interests outweigh our legitimate interest.**

9. Custom Services

Job Applications

We offer website visitors the opportunity to submit job applications to us (e.g. via e-mail, via postal services or by submitting the online job application form). Below, we will brief you on

the scope, purpose and use of the personal data collected from you in conjunction with the application process. We assure you that the collection, processing and use of your data will occur in compliance with the applicable data privacy rights and all other statutory provisions and that your data will always be treated as strictly confidential.

Scope and purpose of the collection of data

If you submit a job application to us, we will process any affiliated personal data (e.g. contact and communications data, application documents, notes taken during job interviews, etc.), if they are required to make a decision concerning the establishment or an employment relationship. The legal grounds for the aforementioned are § 26 New GDPR according to German Law (Negotiation of an Employment Relationship), Art. 6 Sect. 1 lit. b GDPR (General Contract Negotiations) and – provided you have given us your consent – Art. 6 Sect. 1 lit. a GDPR. You may revoke any consent given at any time. Within our company, your personal data will only be shared with individuals who are involved in the processing of your job application.

If your job application should result in your recruitment, the data you have submitted will be archived on the grounds of § 26 New GDPR and Art. 6 Sect. 1 lit. b GDPR for the purpose of implementing the employment relationship in our data processing system.

Data Archiving Period

If we are unable to make you a job offer or you reject a job offer or withdraw your application, we reserve the right to retain the data you have submitted on the basis of our legitimate interests (Art. 6 para. 1 lit. f GDPR) for up to 6 months from the end of the application procedure (rejection or withdrawal of the application). Afterwards the data will be deleted, and the physical application documents will be destroyed. The storage serves in particular as evidence in the event of a legal dispute. If it is evident that the data will be required after the expiry of the 6-month period (e.g. due to an impending or pending legal dispute), deletion will only take place when the purpose for further storage no longer applies.

Longer storage may also take place if you have given your agreement (Article 6 (1) (a) GDPR) or if statutory data retention requirements preclude the deletion.