

usd AG Privacy Protection

usd AG
Privacy Protection
(Date: 05.2024)

- 1. Our privacy protection at a glance**
- 2. General information and mandatory information**
- 3. Right to demand processing restrictions**
- 4. Recording of data on our website**
- 5. Our Events**
- 6. Online-based audio and video conferences (conference tools)**
- 7. Newsletter (e.g. CST Academy News)**
- 8. Plug-ins and Tools**
- 9. Social media presences**
- 10. Custom services**
- 11. Whistleblower system**
- 12. Confirmation of foreign VAT identification numbers**
- 13. Change of our privacy policy**

1. Our privacy protection at a glance

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 our 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 our 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.

Our IT systems automatically record other data when you visit our website. 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 our 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 analyze your user patterns.

Analysis tools and tools provided by third parties

There is a possibility that your browsing patterns will be statistically analyzed when your visit our website. Such analyses are performed primarily with cookies and with what we refer to as analysis programs. As a rule, the analyses of your browsing patterns are conducted anonymously; i.e. the browsing patterns cannot be traced back to you.

You have the option to object to such analyses or you can prevent their performance by not using certain tools. For detailed information about the tools and about your options to object, please consult our Data Protection Declaration below.

2. 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:

usd AG
Frankfurter Str. 233, Haus C1
63263 Neu-Isenburg

Phone: +49 6102 8631-0

E-mail: contact@usd.de

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:

DEUDAT GmbH
Marcel Wetzel
Zehntenhofstraße 5b
65201 Wiesbaden

Phone: +49 611 950008-40

E-mail: usd@deudat.de

Information on data transfer to the USA

Our website uses, in particular, tools from companies based in the USA. When these tools are active, your personal information may be transferred to the US servers of these companies. We must point out that the USA is not a safe third country within the meaning of EU data protection law. US companies are required to release personal data to security authorities without you as the data subject being able to take legal action against this. The possibility cannot therefore be excluded that US authorities (e.g. secret services) may process, evaluate, and permanently store your data on US servers for monitoring purposes. We have no influence over these processing activities.

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 defense 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 program.

You can recognize 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, blockage, 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, blocked 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.”

3. 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.

Duration of storage

Unless a more specific storage period has been specified in this privacy policy, your personal data will remain with us until the purpose for which it was collected no longer applies. If you assert a justified request for deletion or revoke your consent to data processing, your data will be deleted, unless we have other legally permissible reasons for storing your personal data (e.g., tax or commercial law retention periods); in the latter case, the deletion will take place after these reasons cease to apply.

Legal basis of processing

If you have given us consent to process your personal data for a specific purpose, the processing is performed on the basis of Art. 6 para. 1 a DSGVO. If such processing is necessary in order to fulfill or initiate a contract with you, the processing is based on Article 6 (1) (b) GDPR. In some cases, z. For example, in order to fulfill tax obligations, we may be subject to a legal obligation to process personal data. The legal basis for this in such cases is Article 6 (1) (c) GDPR. In rare cases, processing may also be done to protect vital interests of you or another natural person. In this exceptional case, processing takes place on the basis of Art. 6 para. 1 d DSGVO. Finally, processing operations can also be based on Art. 6 para. 1 f of the GDPR. This is the case if the processing is to safeguard a legitimate interest for our company or a third party, unless your interests, fundamental rights and fundamental freedoms prevail. Such a legitimate interest can already be accepted if you are a customer of ours. If the processing of personal data is based on Art. 6 (1) (f) GDPR, our legitimate interest is the performance of our business activities.

Use of photo & film recordings

At usd AG events, photos or film recordings are made for the purpose of publication on our website and / or on our social media presences.

If you consent to such use, you may consent to do so. The submission of the declaration of consent is voluntary and can be revoked by you at any time, even during the event, without giving reasons.

In the event, that you do not wish to give the consent, we expressly state that this does not involve any disadvantages for you.

The intended use of the photos or film recordings on our website and / or on our social media presences offers the possibility of worldwide access or retrieval of the recordings, even from countries in which there is no or no adequate data protection standard. Therefore, usd AG can neither influence the access to this data via the internet nor the use of this data and, to that extent, can not assume any liability for the observance of data protection.

As a precautionary measure, we also point out that with the help of suitable search engines personal data can be found on the Internet and the persons portrayed on photo or film recordings can be found and may also be identified.

Thereby, it is also possible to form personality profiles by combining these data and information with other data available on the Internet, and to create additional usage possibilities, e.g. for advertising purposes. Due to the possibility of worldwide access by third parties, in the event of a revocation of consent and despite the removal of your recordings from our website and / or our social media presences further use by other agencies or persons or a search via archive functions of search engines can not be excluded.

4. Recording of data on our website

Cookies

In some instances, our website and its pages use so-called cookies. Cookies do not cause any damage to your computer and do not contain viruses. The purpose of cookies is to make our website more user friendly, effective and more secure. Cookies are small text files that are placed on your computer and stored by your browser.

Most of the cookies we use are so called "session cookies." They are automatically deleted after your leave our site. Other cookies will remain archived on your device until you delete them. These cookies enable us to recognise your browser the next time you visit our website.

You can adjust the settings of your browser to make sure that you are notified every time cookies are placed and to enable you to accept cookies only in specific cases or to exclude the acceptance of cookies for specific situations or in general and to activate the automatic deletion of cookies when you close your browser. If you deactivate cookies, the functions of this website may be limited.

Cookies that are required for the performance of the electronic communications transaction or to provide certain functions you want to use (e.g. the shopping cart function), are stored on the basis of Art. 6 Sect. 1 lit. f GDPR. The website operator has a legitimate interest in storing cookies to ensure the technically error free and optimised provision of the operator's services. If other cookies (e.g. cookies for the analysis of your browsing patterns) should be stored, they are addressed separately in this Data Protection Declaration. If your consent to the storage of the cookies and similar recognition technologies has been requested, processing occurs exclusively on the basis of the consent obtained (Art. 6(1)(a) GDPR and § 25 (1) TDDDG); this consent may be revoked at any time.

Further information on cookies can be found in our cookie policy.

Consent with Borlabs Cookie

Our website uses the Borlabs consent technology to obtain your consent to the storage of certain cookies in your browser or for the use of certain technologies and for their data privacy protection compliant documentation. The provider of this technology is Borlabs - Benjamin A. Bornschein, Rübenkamp 32, 22305 Hamburg, Germany (hereinafter referred to as Borlabs).

Whenever you visit our website, a Borlabs cookie will be stored in your browser, which archives any declarations or revocations of consent you have entered. These data are not shared with the provider of the Borlabs technology.

The recorded data shall remain archived until you ask us to eradicate them, delete the Borlabs cookie on your own or the purpose of storing the data no longer exists. This shall be without prejudice to any retention obligations mandated by law. To review the details of Borlabs' data processing policies, please visit <https://de.borlabs.io/kb/welche-daten-speichert-borlabs-cookie/>

We use the Borlabs cookie consent technology to obtain the declarations of consent mandated by law for the use of cookies. The legal basis for the use of such cookies is Art. 6(1)(c) GDPR.

Links

If you use external links offered within our website, this privacy policy does not extend to these links. Insofar as we offer links, we assure that at the time of the link setting no violations of the applicable law on the linked websites were identified. However, we have no influence on the compliance of other providers with privacy and security regulations. Therefore, please inform yourself on the websites of the other providers also about the privacy statements provided there.

Children and adolescents

Persons under the age of 16 should not submit any personal data to us without the consent of their parents or guardians. We do not request personal information from children and adolescents, do not collect them and do not disclose them to third parties.

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.

Request by e-mail, telephone, fax or via forms on the website

If you contact us by e-mail, telephone, fax or via forms on the website, 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.

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 your consent (Article 6 (1) a GDPR) and/or on our legitimate interests (Article 6 (1) (f) GDPR), since we have a legitimate interest in the effective processing of requests addressed to us.

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.

Registration on this website

You have the option to register on this website to be able to use additional website functions. We shall use the data you enter only for the purpose of using the respective offer or service you have registered for. The required information we request at the time of registration must be entered in full. Otherwise, we shall reject the registration.

To notify you of any important changes to the scope of our portfolio or in the event of technical modifications, we shall use the e-mail address provided during the registration process.

We shall process the data entered during the registration process on the basis of your consent (Art. 6(1)(a) GDPR).

The data recorded during the registration process shall be stored by us as long as you are registered on this website. Subsequently, such data shall be deleted. This shall be without prejudice to mandatory statutory retention obligations.

5. Our Events

Event registration

In order to register for our events, we use the software solution of EMENDO Event + Congress GmbH & Co. KG, Schönbergstraße 24, 73760 Ostfildern. You can participate in a seminar, training or workshop by registering in advance through CST Academy (<https://www.usd.de/cst-academy/>). For this purpose, the following personal data, among others, will be requested: title (optional), first name, last name, e-mail address, telephone (optional), company/institution, position (optional) and intolerances/allergies (optional).

We use the data submitted only for the purpose of registration and organization of the respective event for which you have registered. The legal basis for this is Art. 6 para. 1 p. 1 lit. f) GDPR for events that are free of charge and additionally Art. 6 para. 1 p. 1 lit. b) GDPR for events that are subject to a charge.

For important information about the event (including cancellations or changes to the services offered) or in the event of technically necessary changes, we will use the e-mail address provided during registration to inform you in this way.

The data collected during registration will be stored by us, used for the execution as well as preparation and follow-up of the event, and will be deleted afterwards. Legal retention periods remain unaffected.

Participating in Online Events

For online events, an encrypted connection is established between you and GoToWebinar or Microsoft Teams. The audio or visual information transmitted via GoToWebinar during webinars is recorded by us for distribution of the information on YouTube. Statistical data is collected during and after the webinar is conducted. If you participate in a webinar, in addition to your registration data, we receive information about the duration of participation, questions asked or answers given for the purpose of further customer support. Following a webinar, it is possible that we will send you the most important information from the webinar by e-mail together with a reference to our services.

For more information see "Online-based audio and video conferences"

6. Online-based audio and video conferences (conference tools)

Data processing

We use online conference tools, among other things, for communication with our customers. The tools we use are listed in detail below. If you communicate with us by video or audio conference using the Internet, your personal data will be collected and processed by the provider of the respective conference tool and by us. The conferencing tools collect all information that you provide/access to use the tools (email address and/or your phone number). Furthermore, the conference tools process the duration of the conference, start and end (time) of participation in the conference, number of participants and other “context information” related to the communication process (metadata). Furthermore, the provider of the tool processes all the technical data required for the processing of the online communication. This includes, in particular, IP addresses, MAC addresses, device IDs, device type, operating system type and version, client version, camera type, microphone or loudspeaker and the type of connection.

Should content be exchanged, uploaded or otherwise made available within the tool, it is also stored on the servers of the tool provider. Such content includes, but is not limited to, cloud recordings, chat/ instant messages, voicemail uploaded photos and videos, files, whiteboards and other information shared while using the service. Please note that we do not have complete influence on the data processing procedures of the tools used. Our possibilities are largely determined by the corporate policy of the respective provider. Further information on data processing by the conference tools can be found in the data protection declarations of the tools used, and which we have listed below this text.

Purpose and legal bases

The conference tools are used to communicate with prospective or existing contractual partners or to offer certain services to our customers (Art. 6 para. 1 sentence 1 lit. b GDPR). Furthermore, the use of the tools serves to generally simplify and accelerate communication with us or our company (legitimate interest in the meaning of Art. 6 para. 1 lit. f GDPR). Insofar as consent has been requested, the tools in question will be used on the basis of this consent; the consent may be revoked at any time with effect from that date.

Duration of storage

Data collected directly by us via the video and conference tools will be deleted from our systems immediately after you request us to delete it, revoke your consent to storage, or the reason for storing the data no longer applies. Stored cookies remain on your end device until you delete them. Mandatory legal retention periods remain unaffected.

We have no influence on the duration of storage of your data that is stored by the operators of the conference tools for their own purposes. For details, please contact directly the operators of the conference tools.

Conference tools used

We employ the following conference tools:

GoToWebinar

We use GoToWebinar. The provider is GoTo Technologies Ireland Unlimited Company, 77 Sir John Rogerson's Quay, Block C, Suite 207, Grand Canal Docklands, Dublin 2, D02 VK60, Ireland. For details on data processing, please see GoToWebinar's Privacy Policy: <https://www.logmeininc.com/legal/privacy>.

Microsoft Teams

We use Microsoft Teams. The provider is Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA. For details on data processing, please refer to the Microsoft Teams privacy policy: <https://privacy.microsoft.com/en-us/privacystatement>.

The company is certified in accordance with the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link: <https://www.dataprivacyframework.gov/list>

7. Newsletter (e.g. CST Academy News)

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. For the handling of the newsletter, we use newsletter service providers, which are described below.

CleverReach

This website uses CleverReach for the sending of newsletters. The provider is the CleverReach GmbH & Co. KG, Schafjückenweg 2, 26180 Rastede, Germany (hereinafter "CleverReach"). CleverReach is a service that can be used to organize and analyze the sending of newsletters. The data you have entered for the purpose of subscribing to our newsletter (e.g., e-mail address) are stored on servers of CleverReach in Germany or in Ireland.

Newsletters we send out via CleverReach allow us to analyze the user patterns of our newsletter recipients. Among other things, in conjunction with this, it is possible to analyse how many recipients actually opened the newsletter e-mail and how often which link inside the newsletter has been clicked. For more information on the data analysis services by CleverReach newsletters, please go to: <https://www.cleverreach.com/en/features/reporting-tracking/>.

The data is processed based on your consent (Art. 6(1)(a) GDPR). You may revoke any consent you have given at any time by unsubscribing from the newsletter. This shall be without prejudice to the lawfulness of any data processing transactions that have taken place prior to your revocation.

If you do not want to permit an analysis by CleverReach, you must unsubscribe from the newsletter. We provide a link for you to do this in every newsletter message.

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, if such action is necessary 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(1)(f) GDPR). The storage in the blacklist is indefinite. You may object to the storage if your interests outweigh our legitimate interest.

For more details, please consult the Data Protection Provisions of CleverReach at: <https://www.cleverreach.com/en/privacy-policy/>.

Data processing

We have concluded a data processing agreement (DPA) with the above-mentioned provider. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.

8. Plug-ins and Tools

YouTube with expanded data protection integration

Our website embeds videos of the website YouTube. The website operator is Google Ireland Limited (“Google”), Gordon House, Barrow Street, Dublin 4, Ireland.

We use YouTube in the expanded data protection mode. According to YouTube, this mode ensures that YouTube does not store any information about visitors to this website before they watch the video. Nevertheless, this does not necessarily mean that the sharing of data with YouTube partners can be ruled out as a result of the expanded data protection mode. For instance, regardless of whether you are watching a video, YouTube will always establish a connection with the Google DoubleClick network.

As soon as you start to play a YouTube video on this website, a connection to YouTube’s servers will be established. As a result, the YouTube server will be notified, which of our pages you have visited. If you are logged into your YouTube account while you visit our site, you enable YouTube to directly allocate your browsing patterns to your personal profile. You have the option to prevent this by logging out of your YouTube account.

Furthermore, after you have started to play a video, YouTube will be able to place various cookies on your device or comparable technologies for recognition (e.g. device fingerprinting). In this way YouTube will be able to obtain information about this website’s visitors. Among other things, this information will be used to generate video statistics with the aim of improving the user friendliness of the site and to prevent attempts to commit fraud.

Under certain circumstances, additional data processing transactions may be triggered after you have started to play a YouTube video, which are beyond our control.

The use of YouTube is based on our interest in presenting our online content in an appealing manner. Pursuant to Art. 6(1)(f) GDPR, this is a legitimate interest. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6(1)(a) GDPR and § 25 (1) TDDDG, insofar the consent includes the storage of cookies or the access to information in the user’s end device (e.g., device fingerprinting) within the meaning of the TDDDG. This consent can be revoked at any time.

For more information on how YouTube handles user data, please consult the YouTube Data Privacy Policy under: <https://policies.google.com/privacy?hl=en>.

The company is certified in accordance with the “EU-US Data Privacy Framework” (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US.

Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link: <https://www.dataprivacyframework.gov/list>

Font Awesome (local embedding)

This website uses Font Awesome to ensure the uniform use of fonts on this site. Font Awesome is locally installed so that a connection to Fonticons, Inc.'s servers will not be established in conjunction with this application.

For more information on Font Awesome, please and consult the Data Privacy Declaration for Font Awesome under: <https://fontawesome.com/privacy>.

DocuSign

usd AG uses the services of DocuSign for the creation and transmission of digital signatures for the purpose of concluding contracts. The provider is DocuSign Germany GmbH, located at Neue Rothofstrasse 13-19, 60313 Frankfurt, Germany.

When using this service, the following personal data is processed in order to be able to trace and ensure the identity of the contracting parties:

- a. First and last name of the signatory
- b. E-mail address of the signatory
- c. Initials of the signatory
- d. Digital signature of the signatory in facsimile form (image)
- e. Function of the signatory

usd AG uses the services of DocuSign in the interest of a fast and uncomplicated digital signing of contracts, taking into account the identification of the signatory when using digital signatures in accordance with the European eIDAS Regulation. This constitutes a legitimate interest within the meaning of Art. 6 para. 1 lit. f DSGVO.

For further information on data protection, please refer to DocuSign's privacy protection declaration: <https://www.docusign.de/unternehmen/datenschutz>.

Data processing

We have concluded a data processing agreement (DPA) with the above-mentioned provider. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.

9. Social media presences

This privacy policy applies to the following social media appearances:

<https://www.facebook.com/usdag/>

<https://twitter.com/usdAG>

<https://www.xing.com/pages/usdag>

https://www.linkedin.com/company/usdag/?originalSubdomain=de&original_referer=

https://www.meetup.com/de-DE/Cyber-Security-Transformation-Academy/?_locale=de-DE

<https://www.kununu.com/de/usdde>

<https://github.com/usdAG>

<https://consent.youtube.com/m?con->

[tinue=https%3A%2F%2Fwww.youtube.com%2FusdAG%3Fcb%3D1&gl=DE&m=0&pc=yt&hl=de&src=1](https://www.youtube.com/2Fc%2FusdAG%3Fcb%3D1&gl=DE&m=0&pc=yt&hl=de&src=1)

<https://www.instagram.com/usdhero/>

<https://www.hackthebox.com/hacker/infosec-careers/company/329>

<https://www.reddit.com/user/usdAG/>

<https://infosec.exchange/@usdAG>

Data processing through social networks

We maintain publicly available profiles in social networks. The individual social networks we use can be found below.

Social networks such as Facebook, Twitter etc. can generally analyze your user behavior comprehensively if you visit their website or a website with integrated social media content (e.g., like buttons or banner ads). When you visit our social media pages, numerous data protection-relevant processing operations are triggered. In detail:

If you are logged in to your social media account and visit our social media page, the operator of the social media portal can assign this visit to your user account. Under certain circumstances, your personal data may also be recorded if you are not logged in or do not have an account with the respective social media portal. In this case, this data is collected, for example, via cookies stored on your device or by recording your IP address.

Using the data collected in this way, the operators of the social media portals can create user profiles in which their preferences and interests are stored. This way you can see interest-based advertising inside and outside of your social media presence. If you have an account with the social network, interest-based advertising can be displayed on any device you are logged in to or have logged in to.

Please also note that we cannot retrace all processing operations on the social media portals. Depending on the provider, additional processing operations may therefore be carried out by the operators of the social media portals. Details can be found in the terms of use and privacy policy of the respective social media portals.

Legal basis

Our social media appearances should ensure the widest possible presence on the Internet. This is a legitimate interest within the meaning of Art. 6 (1) lit. f GDPR. The analysis processes initiated by the social networks may be based on divergent legal bases to be specified by the operators of the social networks (e.g., consent within the meaning of Art. 6 (1) (a) GDPR).

Responsibility and assertion of rights

If you visit one of our social media sites (e.g., Facebook), we, together with the operator of the social media platform, are responsible for the data processing operations triggered during this visit. You can in principle protect your rights (information, correction, deletion, limitation of processing, data portability and complaint) vis-à-vis us as well as vis-à-vis the operator of the respective social media portal (e.g., Facebook).

Please note that despite the shared responsibility with the social media portal operators, we do not have full influence on the data processing operations of the social media portals. Our options are determined by the company policy of the respective provider.

Storage time

The data collected directly from us via the social media presence will be deleted from our systems as soon as you ask us to delete it, you revoke your consent to the storage or the purpose for the data storage lapses. Stored cookies remain on your device until you delete them. Mandatory statutory provisions - in particular, retention periods - remain unaffected.

We have no control over the storage duration of your data that are stored by the social network operators for their own purposes. For details, please contact the social network operators directly (e.g., in their privacy policy, see below).

Individual social networks

Facebook

We have a profile on Facebook. The provider of this service is Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. According to Facebook's statement the collected data will also be transferred to the USA and to other third-party countries.

We have signed an agreement with Facebook on shared responsibility for the processing of data (Controller Addendum). This agreement determines which data processing operations we or Facebook are responsible for when you visit our Facebook Fanpage. This agreement can be viewed at the following link: https://www.facebook.com/legal/terms/page_controller_addendum

You can customize your advertising settings independently in your user account. Click on the following link and log in: <https://www.facebook.com/settings?tab=ads>

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here: https://www.facebook.com/legal/EU_data_transfer_addendum
<https://de-de.facebook.com/help/566994660333381>

Details can be found in the Facebook privacy policy: <https://www.facebook.com/about/privacy/>

The company is certified in accordance with the “EU-US Data Privacy Framework” (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link: <https://www.dataprivacyframework.gov/list>

X (formerly Twitter)

We use the short message service X (formerly Twitter). The provider is the parent company X Corp., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA. Responsible for the data processing of individuals living outside the United States is the branch Twitter International Unlimited Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07, Ireland.

You can customize your X privacy settings in your user account. Click on the following link and log in: <https://twitter.com/personalization>

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here: <https://gdpr.twitter.com/en/controller-to-controller-transfers.html>

For details, see the X privacy policy: <https://twitter.com/privacy>

XING

We have a profile on XING. The provider is New Work SE, Dammtorstraße 30, 20354 Hamburg, Germany. Details on their handling of your personal data can be found in the XING privacy policy: <https://privacy.xing.com/de/datenschutzerklaerung>

LinkedIn

We have a LinkedIn profile. The provider is the LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland. LinkedIn uses advertising cookies.

If you want to disable LinkedIn advertising cookies, please use the following link: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here: <https://www.linkedin.com/legal/l/dpa>

<https://www.linkedin.com/legal/l/eu-sccs>

For details on how they handle your personal information, please refer to LinkedIn's privacy policy: <https://www.linkedin.com/legal/privacy-policy>

The company is certified in accordance with the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link: <https://www.dataprivacyframework.gov/list>

MeetUp

The provider is Meetup Inc. 632 Broadway, 10th Floor, New York City, New York 10012, USA

Details on how they handle your personal data can be found in the Meetup privacy policy: <https://www.meetup.com/de-DE/privacy/>

Opt-Out possibilities: <https://www.meetup.com/de-DE/privacy/#section5>

Kununu

The provider is kununu GmbH vertreten durch New Work SE, Dammtorstraße 30, 20354 Hamburg, Deutschland. Details on how they handle your personal data can be found in the kununu privacy policy: <https://privacy.xing.com/en/privacy-policy>

GitHub

The provider is GitHub, Inc., 88 Colin P. Kelly Jr. Street, San Francisco, CA 94107. Details on how they handle your personal data can be found in the GitHub privacy policy: <https://help.github.com/en/github/site-policy/github-privacy-statement#github-privacy-statement>

The company is certified in accordance with the “EU-US Data Privacy Framework” (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link: <https://www.dataprivacyframework.gov/list>

YouTube

We have a profile on YouTube. The provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. Details on how they handle your personal data can be found in the YouTube privacy policy: <https://policies.google.com/privacy?hl=en>

The company is certified in accordance with the “EU-US Data Privacy Framework” (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link: <https://www.dataprivacyframework.gov/list>

Instagram

We have a profile on Instagram. The provider of this service is Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here: https://www.facebook.com/legal/EU_data_transfer_addendum

<https://help.instagram.com/519522125107875>

<https://de-de.facebook.com/help/566994660333381>

For details on how they handle your personal information, see the Instagram privacy policy: <https://help.instagram.com/519522125107875>

The company is certified in accordance with the “EU-US Data Privacy Framework” (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link: <https://www.dataprivacyframework.gov/list>

Hack The Box

We have a profile on Hack The Box. The provider is Hack The Box Ltd., 38, Walton Road, Folkestone, Kent, UK, CT19 5QS. Details on their handling of your personal data can be found in the Hack The Box privacy notice: <https://www.hackthebox.com/legal/privacynotice>

You have the option of applying directly to us via Hack The Box and sending us your application documents. For information on how we process your data as part of the application process, please refer to the section "Job applications" of this privacy notice.

Mastodon

We have a profile on Mastodon. The provider is Mastodon gGmbH, Mühlenstraße 8a, 14167 Berlin, Germany. Details on their handling of your personal data can be found in the Mastodon privacy policy: <https://joinmastodon.org/de/privacy-policy>

Reddit

We have a profile on Reddit. The provider is Reddit Inc. 548 Market Street #16093, San Francisco, CA 94104, USA. Details on their handling of your personal data can be found in the Reddit privacy policy: <https://www.reddit.com/de-de/policies/privacy-policy>

10. Custom services

Job applications

We offer the opportunity to submit job applications to us (e.g. via e-mail, via postal services or via online job application forms). 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), if they are required to make a decision concerning the establishment or an employment relationship. For freelancer we process your data for the mediation of potential orders corresponding to your qualification profile.

The legal grounds for the processing of personal data in the application process are § 26 GDPR (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 GDPR and Art. 6 Sect. 1 lit. b GDPR for the purpose of implementing the employment relationship in our data processing system.

Personio

In addition, the "Personio" job application platform provided by Personio GmbH ("hereinafter referred to as Personio"), Rundfunkplatz 4, 80335 Munich, Germany, is integrated on our website. Once you click on the "Careers" button on our website, you will be redirected by your browser to the Personio servers, through which top.media GmbH publishes its job advertisements. The data you submit as part of your application will be transmitted using TLS encryption and stored in a database. This database is operated by Personio GmbH (<https://www.personio.com/legal-notice/>). You can find more information about the processing of your personal data in the privacy policy of Personio: <https://www.personio.de/datenschutzerklaerung/>.

In this context, Personio is our contract processor according to Art. 28 GDPR. The basis for the processing is a contract for commissioned data processing between us as the Data Controller and Personio.

Data Archiving Period

If we should not be able to offer you a position, if you refuse a job offer, retract your application, revoke your consent to the processing of your data or ask us to delete your data, we will store your transferred data, incl. any physically submitted application documents for a maximum of 6 months after the conclusion of the application process (retention period) to enable us to track the details of the application process in the event of disparities (Art. 6 Sect. 1 lit. f GDPR).

YOU HAVE THE OPTION TO OBJECT TO THIS STORAGE/RETENTION OF YOUR DATA IF YOU HAVE LEGITIMATE INTERESTS TO DO SO THAT OUTWEIGH OUR INTERESTS.

Once the retention period has expired, the data will be deleted, unless we are subject to any other statutory retention obligations or if any other legal grounds exist to continue to store the data. If it should be foreseeable that the retention of your data will be necessary after the retention period has expired (e.g. due to imminent or pending litigation), the data shall not be deleted until the data have become irrelevant. This shall be without prejudice to any other statutory retention periods.

Recruiting Platforms

For details on how Stepstone handles your personal information, see the Stepstone privacy policy: <https://www.stepstone.de/Ueber-StepStone/datenschutzerklaerung/>

For details on how get in IT handles your personal information, see the get in IT privacy policy: <https://www.get-in-it.de/datenschutz>

11. Whistleblower system

We process your personal data and the personal data of third parties that you have provided to us in order to fulfill our obligations pursuant to Art. 6 (1) lit. c) GDPR in conjunction with Art. 17 of Directive (EU) 2019/1937 of the European Parliament and of the Council of October 2019 on the protection of persons who report breaches of Union law and on the basis of your consent pursuant to Art. 6 (1) a) GDPR.

The purpose of this is the establishment of reporting channels for the acceptance and processing of reports as well as taking measures and communicating with authorities and data subjects. Recipients of the data are exclusively the employees designated in accordance with the EU Directive who are entrusted with accepting, verifying and processing reports and, if necessary, authorities and other third parties that we contact with your consent. The personal data will be anonymized as far as necessary and possible. Your data will be deleted no later than 3 months after the conclusion of the procedure.

12. Confirmation of foreign VAT identification numbers

After the registration of international customers from other EU countries on our platforms or in our systems, as well as every six months thereafter, a query is made to the German Federal Central Tax Office (Bundeszentralamt für Steuern, BZSt) regarding the validity of the VAT identification number. Among other data, the company name is transmitted to the BZSt. The transmission is based on our legitimate interests in verifying whether the service is performed to a company registered in a member state of the EU, in accordance with Art. 6 para. 1 lit. f) GDPR, in order to comply with tax law requirements.

For details on the handling of your data, please refer to the data protection information of the BZSt: https://www.bzst.de/EN/Federal_Central_Tax_Office/privacy_policy/privacy_policy_node.html

13. Change of our privacy policy

We reserve the right to change our security and privacy practices to the extent required by technical developments. In these cases, we will also adapt our privacy policy accordingly. Please therefore take note of the current version of our privacy policy.