

Privacy policy

Compliance with data protection regulations is of particular importance to us. The aim of this data protection declaration is to inform you as a user of the website and the online platform stazzle about the type, scope and purpose of the processing of personal data and the rights that exist for you, insofar as you are deemed to be a data subject within the meaning of Art. 4 No. 1 of the General Data Protection Regulation. The following data protection declaration already takes into account the new provisions of the General Data Protection Regulation (DSGVO), which will apply from 25 May 2018. At the same time, this declaration also fulfils the requirements of Section 13 of the German Telemedia Act (Telemediengesetz) applicable until then.

The controller is the:

HR Software Solutions GmbH
Adenauerplatz 1
33602 Bielefeld
GERMANY

Authorised representatives: Marco Schmidt

E-mail: kontakt@stazzle.de

Phone: +49 5218 9880 20

Imprint: www.stazzle.de/impressum

1. Scope

- 1.1. This data protection notice applies to the use of the online platform stazzle (hereinafter: „stazzle“), which is provided to you for use and operated by us, HR Software Solutions GmbH, located at Adenauerplatz 1, 33602 Bielefeld, Germany.
- 1.2. The provision of stazzle is based on the Terms of Use provided by us. Any general terms and conditions of you will not apply, even if we do not object to their application.
- 1.3. Both contracting parties shall comply with the applicable data protection provisions, in particular those applicable in Germany, in particular the DSGVO and the BDSG.
- 1.4. Insofar as commissioned data processing within the meaning of Art. 28 DSGVO arises in the context of the fulfilment of the contract, you and we agree on the validity of the data protection regulation of HR Software Solutions GmbH.
- 1.5. You are the data controller for the processing of any personal data you may enter into stazzle. If you store personal data of third parties in stazzle, in particular in order to be able to manage staff deployment, you are obliged to inform the data subjects of this in advance and to make them aware of the data protection information on stazzle, insofar as this is necessary for the fulfilment of legal obligations.

2. General

In principle, you can only use our portal if you have been given user access. You can obtain this by registering yourself and your company or via your company's administrator. In order for you to obtain access, it is necessary to process personal data. We always ensure that your personal data is only processed in accordance with a legal basis or with your consent.

3. Consent

By using our available forms/entry masks, you consent to us collecting the personal data provided by you and processing it as described in this data protection declaration. You can revoke this consent

at any time with effect for the future by making a corresponding declaration to us via all communication channels. However, we would like to point out that it is no longer possible to use our service without your consent. For your revocation, please use the contact channels indicated above.

4. Relevant legal bases

- 4.1. Below you will find an overview of the legal basis of the GDPR on the basis of which we process personal data. Please note that in addition to the provisions of the GDPR, national data protection regulations may apply in your or our country of residence or domicile. Should more specific legal bases be relevant in individual cases, we will inform you of these in the data protection declaration.
- 4.2. Consent (Art. 6 para. 1 p. 1 lit. a. DSGVO) - The data subject has given his/her consent to the processing of personal data relating to him/her for a specific purpose or purposes.
- 4.3. Legitimate interests (Art. 6 para. 1 p. 1 lit. f. DSGVO) - Processing is necessary to protect the legitimate interests of the controller or a third party, unless such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data.

5. Security measures

- 5.1. We take appropriate technical and organisational measures to ensure a level of protection appropriate to the risk in accordance with the legal requirements, taking into account the state of the art, the implementation costs and the nature, scope, circumstances and purposes of the processing as well as the different probabilities of occurrence and the extent of the threat to the rights and freedoms of natural persons.
- 5.2. The measures include, in particular, ensuring the confidentiality, integrity and availability of data by controlling physical and electronic access to the data, as well as access to, entry into, disclosure of, assurance of availability of and segregation of the data. We also have procedures in place to ensure the exercise of data subjects' rights, the deletion of data and responses to data compromise. Furthermore, we already take the protection of personal data into account in the development or selection of hardware, software and procedures in accordance with the principle of data protection, through technology design and through data protection-friendly default settings.
- 5.3. Shortening of the IP address: If IP addresses are processed by us or by the service providers and technologies used and the processing of a complete IP address is not necessary, the IP address is shortened (also referred to as „IP masking“). In this process, the last two digits or the last part of the IP address after a full stop are removed or replaced by wildcards. The shortening of the IP address is intended to prevent or make it significantly more difficult to identify a person by their IP address.
- 5.4. SSL encryption (https): In order to protect your data transmitted via our online offer, we use SSL encryption. You can recognise such encrypted connections by the prefix https:// in the address line of your browser.

6. Generation of a qualified e-signature

As part of the signature generation process, the data entered in stazzle for the deposited sample contracts is automatically forwarded to Namirial without being permanently stored by us. The respective employee of yours must register with Namirial for this purpose. We are not involved in the

data processing by Namirial and have no influence on it. Namirial has no access to the content data of the contracts. Within the scope of the registration, the respective employee of yours must inform himself/herself about how Namirial processes data.

7. Collection and storage of personal data; type, purpose and use

We only collect and process your personal data if you or an authorised person in your company voluntarily provide it with your knowledge, e.g. by filling in forms, confirming your user access, sending e-mails or entering data in corresponding masks, in the context of using the portal, support contact or requesting product-related information.

If you instruct us, the following information will be collected:

- Salutation, title, first name, last name
- Address
- E-mail address
- Telephone number (landline and/or mobile)
- National insurance number, if applicable
- Nationality, if applicable
- Place of birth, if applicable
- Account details, if applicable
- Date of birth, if applicable

In addition, all information is collected that is necessary for the fulfilment of the contract with you.

The personal data provided by you and its contents remain exclusively with us and our subcontractors. We will only store and process your data for the purposes stated in section 4. Any use beyond the stated purpose requires your express consent. The same applies to the transfer and transmission of your data to third parties.

In addition, we process the data that you enter in the context of portal use and which were named in §5 of the agreement on commissioned processing. The provisions of the order processing apply here. This will be provided to you separately for signature.

The collection of personal data takes place,

- to be able to identify you as a customer;
- to be able to advise you appropriately;
- in order to be able to fulfil our contractual obligations towards you;
- in order to be able to comply with our legal obligations:
- for correspondence with you;
- for invoicing or, if applicable, within the framework of the dunning process;
- for the purposes of permissible direct advertising;
- to assert any claims against you;
- To ensure that our website and stazzle are presented in the most effective and interesting way possible to you (e.g. through anonymised analysis);
- to inform you about changes and news of our services, as far as you have consented accordingly.

In addition, you have the possibility to enter personal data of further employees or temporary workers in corresponding masks and to provide them to customers or suppliers of our customers for the preparation and implementation of their respective contractual obligations.

The processing of personal data takes place on the occasion of your enquiry with us and is necessary for the stated purposes for the processing of your order and for the fulfilment of obligations arising from the underlying contract.

The personal data collected will be stored until the expiry of the statutory retention obligation for merchants (6, 8 or 10 years after the end of the calendar year in which the contractual relationship was terminated) and then deleted. This does not apply exceptionally if we are obliged to store the data for a longer period due to tax or commercial law retention obligations (in accordance with the German Commercial Code (HGB), the German Criminal Code (StGB) or the German Tax Code (AO)) or if you have consented to storage beyond this period.

8. Contents of the user

a.) You grant us exclusive, territorially and temporally unrestricted usage rights to all content of any kind published via stazzle, including texts and images. These rights of use are transferable and extend in particular to the right to make the content accessible via stazzle and to reproduce, edit, store, distribute, run, broadcast and reproduce it for this purpose. These rights apply solely in connection with the Affiliated Customers, Staffing Providers, and stazzle.

b.) Personal data of users and temporary workers as well as contract and price information are excluded from this re-regulation. These data will only be passed on to your business partners with your prior consent.

Furthermore, graphics such as logos are subject to limited use due to trademark law. This use is limited to the usual scope as profile information and will not be exceeded.

You promise that you can grant the corresponding rights of use and that the content does not violate any rights of third parties, in particular copyrights or personal rights, which applies in particular to the profile pictures of employees posted by you.

9. Transmission of personal data

9.1. Transfer of data within the organisation: We may transfer or provide access to personal data to other entities within our organisation. Where this transfer is for administrative purposes, the transfer of data is based on our legitimate business and commercial interests or is made where it is necessary for the performance of our contract-related obligations or where there is consent from the data subjects or legal permission.

9.2. A transfer of your personal data to third parties does not take place in principle. Exceptions to this only apply if this is necessary for the processing of contractual relationships with you. This includes in particular the transfer to service providers commissioned by us (so-called contractors) or other third parties whose activities are necessary for the execution of the contract (e.g. IT service providers or banks). The data passed on may be used by the third parties exclusively for the purposes stated. In such cases, we observe the legal requirements and, in particular, conclude appropriate contracts or agreements that serve to protect your data with the recipients of your data.

9.3. You are prohibited from disclosing another user's data to third parties or processing it for purposes other than initiating a contractual relationship without their express consent.

10. Data processing in third countries

10.1. If we process data in a third country (i.e. outside the European Union (EU), the European Economic Area (EEA)) or the processing takes place in the context of the use of third-party services or the disclosure or transfer of data to other persons, bodies or companies, this will only be done in accordance with the statutory requirements.

- 10.2. Subject to express consent or contractually or legally required transfer, we only process or have data processed in third countries with a recognised level of data protection, contractual obligation through so-called standard protection clauses of the EU Commission, in the presence of certifications or binding internal data protection regulations (Art. 44 to 49 DSGVO, information page of the EU Commission: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection_de).

11. Data deletion

- 11.1. The data processed by us will be deleted in accordance with the legal requirements as soon as their consents permitted for processing are revoked or other permissions cease to apply (e.g. if the purpose of processing this data has ceased to apply or it is not required for the purpose).
- 11.2. If the data are not deleted because they are required for other and legally permissible purposes, their processing is limited to these purposes. I.e. the data is blocked and not processed for other purposes. This applies, for example, to data that must be retained for reasons of commercial or tax law or whose storage is necessary for the assertion, exercise or defence of legal claims or for the protection of the rights of another natural or legal person.
- 11.3. Our privacy notices may also contain further information on the retention and deletion of data, which will take precedence for the respective processing operations.

12. Use of cookies

- 12.1. Cookies are text files that contain data from visited websites or domains and are stored by a browser on the user's computer. A cookie is primarily used to store information about a user during or after their visit within an online offering. Stored information may include, for example, language settings on a website, login status, a shopping cart or where a video was watched. The term cookies also includes other technologies that perform the same functions as cookies (e.g. when user details are stored using pseudonymous online identifiers, also known as „user IDs“).
- 12.2. The following cookie types and functions are distinguished:
- Temporary cookies (also: session cookies): Temporary cookies are deleted at the latest after a user has left an online offer and closed his browser.
 - Permanent cookies: Permanent cookies remain stored even after the browser is closed. For example, the login status can be saved or preferred content can be displayed directly when the user visits a website again. Likewise, the interests of users used for reach measurement or marketing purposes can be stored in such a cookie.
 - First-party cookies: First-party cookies are set by us.
 - Third-party cookies (also: third-party cookies): Third-party cookies are mainly used by advertisers (so-called third parties) to process user information.
 - Necessary (also: essential or absolutely necessary) cookies: Cookies may be absolutely necessary for the operation of a website (e.g. to save logins or other user entries or for security reasons).
 - Statistics, marketing and personalisation cookies: Furthermore, cookies are usually also used in the context of range measurement and when a user's interests or behaviour (e.g. viewing certain content, using functions, etc.) on individual websites are stored in a user profile. Such profiles are used, for example, to show users content that matches their potential interests. This procedure is also referred to as „tracking“, i.e. tracking the potential

interests of users. Insofar as we use cookies or „tracking“ technologies, we will inform you separately in our data protection declaration or in the context of obtaining consent.

- 12.3. Notes on legal bases: The legal basis on which we process your personal data using cookies depends on whether we ask you for consent. If this is the case and you consent to the use of cookies, the legal basis for processing your data is your declared consent. Otherwise, the data processed with the help of cookies is processed on the basis of our legitimate interests (e.g. in the business operation of our online offer and its improvement) or, if the use of cookies is necessary to fulfil our contractual obligations.
- 12.4. Storage period: If we do not provide you with explicit information on the storage period of permanent cookies (e.g. in the context of a so-called cookie opt-in), please assume that the storage period can be up to two years.
- 12.5. General information on revocation and objection (opt-out): Depending on whether the processing is based on consent or legal permission, you have the option at any time to revoke any consent you have given or to object to the processing of your data by cookie technologies (collectively referred to as „opt-out“). You can initially declare your objection by means of your browser settings, e.g. by deactivating the use of cookies (whereby this may also restrict the functionality of our online offer). An objection to the use of cookies for online marketing purposes can also be declared by means of a variety of services, especially in the case of tracking, via the <https://optout.aboutads.info> and <https://www.youronlinechoices.com/> websites. In addition, you can obtain further instructions on how to object within the scope of the information on the service providers and cookies used.
- 12.6. Processing of cookie data on the basis of consent: We use a cookie consent management procedure in which the consent of users to the use of cookies, or to the processing and providers mentioned in the cookie consent management procedure, can be obtained and managed and revoked by users. The declaration of consent is stored in order not to have to repeat the request and to be able to prove the consent in accordance with the legal obligation. The storage can take place on the server side and/or in a cookie (so-called opt-in cookie or with the help of comparable technologies) in order to be able to assign the consent to a user or their device. Subject to individual information on the providers of cookie management services, the following information applies: The duration of the storage of consent can be up to two years. A pseudonymous user identifier is created and stored with the time of consent, information on the scope of consent (e.g. which categories of cookies and/or service providers) and the browser, system and end device used.
- Types of data processed: Usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).
 - Data subjects: Users (e.g. website visitors, users of online services).
 - Legal basis: Consent (Art. 6 para. 1 p. 1 lit. a. DSGVO), Legitimate Interests (Art. 6 para. 1 p. 1 lit. f. DSGVO).
- 12.7. Statistics
Statistics Cookies collect information anonymously. This information helps us understand how our visitors use our website.

– Matomo

Name	Matomo
Anbieter	
Zweck	Cookie from Matomo for website analysis. Generates statistical data about how the visitor uses the website.
Datenschutzerklärung	https://matomo.org/matomo-cloud-privacy-policy/ ; https://matomo.org/privacy-policy/
Cookie Name	_pk_ref; _pk_cvar; _pk_id; _pk_ses; mtm_consent; mtm_consent_removed; mtm_cookie_consent; matomo_ignore; matomo_sessid; _pk_hsr
Cookie Laufzeit	Session / 30 minutes / 14 days / 6 months / 13 months / 30 years

13. Provision of the online offer and web hosting

- 13.1. In order to provide our online offer securely and efficiently, we use the services of one or more web hosting providers from whose servers (or servers managed by them) the online offer can be accessed. For these purposes, we may use infrastructure and platform services, computing capacity, storage space and data-base services as well as security services and technical maintenance services.
- 13.2. The data processed as part of the provision of the hosting service may include all information relating to the users of our online service that is generated as part of the use and communication. This regularly includes the IP address, which is necessary to be able to deliver the contents of online offers to browsers, and all entries made within our online offer or from websites.
- 13.3. E-mail dispatch and hosting: The web hosting services we use also include the dispatch, receipt and storage of e-mails. For these purposes, the addresses of the recipients and senders as well as further information regarding the e-mail dispatch (e.g. the providers involved) and the contents of the respective e-mails are processed. The aforementioned data may also be processed for the purpose of recognising SPAM. Please note that e-mails on the Internet are generally not sent in encrypted form. As a rule, e-mails are encrypted in transit, but (unless a so-called end-to-end encryption procedure is used) not on the servers from which they are sent and received. We can therefore not assume any responsibility for the transmission path of the e-mails between the sender and the reception on our server.
 - Types of data processed: Content data (e.g. entries in online forms), usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).
 - Data subjects: Users (e.g. website visitors, users of online services).
 - Purposes of the processing: Provision of our online offer and user-friendliness.
 - Legal basis: Legitimate interests (Art. 6 para. 1 p. 1 lit. f. DSGVO).

14. Amendment and update of the privacy policy

- 14.1. We ask you to regularly inform yourself about the content of our data protection declaration. We adapt the data protection declaration as soon as the changes in the data processing carried out by us make this necessary. We will inform you as soon as the changes require an act of cooperation on your part (e.g. consent) or other individual notification.
- 14.2. Where we provide addresses and contact details of companies and organisations in this privacy statement, please note that the addresses may change over time and please check the details before contacting us.

15. Rights of the data subjects

15.1. As a data subject, you are entitled to various rights under the GDPR, which arise in particular from Art. 15 to 21 GDPR:

- Right to object: You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you which is carried out on the basis of Article 6(1)(e) or (f) DSGVO; this also applies to profiling based on these provisions. If the personal data concerning you are processed for the purpose of direct marketing, you have the right to object at any time to the processing of personal data concerning you for the purpose of such marketing; this also applies to profiling insofar as it is related to such direct marketing.
- Right of revocation for consents: You have the right to revoke any consent you have given at any time.
- Right of access: You have the right to request confirmation as to whether data in question is being processed and to be informed about this data and to receive further information and a copy of the data in accordance with the legal requirements.
- Right to rectification: In accordance with the law, you have the right to request that data concerning you be completed or that inaccurate data concerning you be rectified.
- Right to erasure and restriction of processing: You have the right, in accordance with the law, to request that data relating to you be erased immediately or, alternatively, to request restriction of the processing of the data in accordance with the law.
- Right to data portability: You have the right to receive data relating to you that you have provided to us in a structured, common and machine-readable format in accordance with the legal requirements or to request that it be transferred to another controller.
- Complaint to the supervisory authority: Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement, if you consider that the processing of personal data relating to you infringes the requirements of the GDPR.

16. Your right to object

If we process your personal data on the basis of a legitimate interest, you have the right to object to this processing. If you wish to exercise your right to object, a notification in text form is sufficient. You are therefore welcome to write to us, send a fax or contact us by e-mail. You can find our contact details under point 1 of this data protection notice.

17. Disclosure of your personal data

17.1. Your personal data will be disclosed as described below.

17.2. The website and stazzle use the services of service providers (e.g. Namirial S.P.A.). In doing so, we ensure that data processing takes place solely in the European Union. The hosting of the website and stazzle is therefore carried out by an external service provider in the European Union. This is necessary for the operation of the website and stazzle, as well as for the establishment, implementation and execution of the existing user contract and is also possible without your consent.

17.3. Data is also passed on if we are entitled or obliged to pass on data due to legal provisions and/or official or court orders. In particular, this may involve the disclosure of information for the purposes of criminal prosecution, to avert danger or to enforce intellectual property rights.

- 17.4. Insofar as your data is passed on to service providers to the extent necessary, they will only have access to your personal data to the extent that this is necessary for the fulfilment of their tasks. These service providers are obliged to treat your personal data in accordance with the applicable data protection laws, in particular the DSGVO.
- 17.5. Beyond the aforementioned circumstances, we generally do not transfer your data to third parties without your consent.
- 17.6. We use Sentry, an error management tool, for our website. The service provider is the American company Sentry Inc, San Francisco, 132 Hawthorne St, San Francisco, USA.

Sentry also processes data from you in the USA, among other places. We would like to point out that according to the opinion of the European Court of Justice, there is currently no adequate level of protection for the transfer of data to the USA. This may be accompanied by various risks to the lawfulness and security of data processing.

As a basis for data processing with recipients located in third countries (outside the European Union, Iceland, Liechtenstein, Norway, i.e. in particular in the USA) or a data transfer there, Sentry uses so-called standard contractual clauses (= Art. 46. para. 2 and 3 DSGVO). Standard Contractual Clauses (SCC) are templates provided by the EU Commission and are intended to ensure that your data complies with European data protection standards even if it is transferred to and stored in third countries (such as the USA). Through these clauses, Sentry undertakes to comply with the European level of data protection when processing your relevant data, even if the data is stored, processed and managed in the US. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding standard contractual clauses here, among other places: https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj?locale=de

The Data Processing Addendum, which corresponds to the standard contractual clauses, can be found at: <https://sentry.io/legal/dpa/>

To learn more about the data processed through the use of Sentry, please see the Privacy Policy at <https://sentry.io/privacy/>.

- 17.7. We use Matomo, a website analytics software, on our website. The service provider is the New Zealand company InnoCraft Ltd, 7 Waterloo Quay PO625, 6140 Wellington, New Zealand.

You can learn more about the data processed through the use of Matomo in the Privacy Policy at <https://matomo.org/privacy-policy/>. Questions about privacy can be directed by email to privacy@matomo.org.

- 17.8. We use the privacy-friendly analysis program Matomo On-Premise on our website. With the on-premise variant, Matomo is installed on our own server. This means that we act as the operator of the software and any data that we might collect from you is stored directly by us. The data processing thus remains entirely in our hands. The service provider is the New Zealand company InnoCraft Ltd, 7 Waterloo Quay PO625, 6140 Wellington, New Zealand.

If you want to know more about the data processing by Matomo On-Premise, you can also contact us. In addition, we recommend reading Matomo's privacy policy at <https://matomo.org/privacy-policy/>.

18. Storage period for the personal data

With regard to the storage period, we delete your personal data as soon as its storage is no longer necessary for the fulfilment of the original purpose and there are no longer any legal retention

periods. The statutory retention periods ultimately form the criterion for the final duration of the storage of personal data. After expiry of the period, the corresponding data is routinely deleted. If retention periods exist, processing is restricted in the form of blocking the data.

19. Note on the provision of personal data by the data subject

At this point, we would like to inform you that the provision of personal data may be required by law (e.g. payment data for the billing of offers subject to a charge) or may result from contractual provisions. In order to make full use of the services offered on the website and stazzle, it is necessary for you to conclude a corresponding usage contract (General Terms of Use/ General Terms and Conditions) with us by registering. For the execution of this contract, it is necessary that you provide us with certain personal data (e.g. user name, e-mail address), which we process in the context of the execution of the contract. If you do not provide us with this personal data (do not provide), this would have the consequence that the contract with you could not be concluded or, in the case of only partial provision, our services could not be provided in full.

20. Data protection on third party websites

The Website and stazzle may contain hyperlinks to and from third party websites. If you follow a hyperlink to one of these websites, please note that we cannot accept any responsibility or guarantee for third-party content or data protection conditions. Please check the applicable privacy policy before submitting any personal data to these websites.

21. Amendment of the privacy policy

- 21.1. We are constantly developing our website and stazzle and stazzle to provide you with an ever improving service. We will always keep this privacy policy up to date and adapt it accordingly if and when this should become necessary.
- 21.2. We will of course inform you in good time of any changes to this data protection declaration. We will do this, for example, by sending an e-mail to the e-mail address you have provided us with. Should further consent from you be required for our handling of your data, we will of course obtain this from you before the corresponding changes take effect.
- 21.3. You can access the current version of our privacy policy at any time on the website and in stazzle under the link Privacy Policy.

22. Definitions of terms

This section provides you with an overview of the terms used in this privacy policy. Many of the terms are taken from the law and defined above all in Art. 4 of the GDPR. The legal definitions are binding. The following explanations, on the other hand, are primarily intended to help you understand them. The terms are sorted alphabetically.

22.1. Processor:

„Processor“ means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the Controller;

22.2. Third:

„Third party“ means a natural or legal person, public authority, agency or other body, other than the data subject, the controller, the processor and the persons authorised to process the personal data under the direct responsibility of the controller or the processor;

22.3. Recipient:

recipient' means a natural or legal person, public authority, agency or other body to whom personal data are disclosed, whether or not a third party. However, public authorities that may

receive personal data in the context of a specific investigation mandate under Union or Member State law shall not be considered as recipients and the processing of such data by those authorities shall be carried out in accordance with the applicable data protection rules, in accordance with the purposes of the processing;

22.4. Restriction of processing:

„Restriction of processing“ means the marking of stored personal data with the aim of limiting their future processing;

22.5. Personal data:

„Personal data“ means any information relating to an identified or identifiable natural person (hereinafter „data subject“); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier (e.g. cookie) or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

22.6. Pseudonymisation:

„Pseudonymisation“ means the processing of personal data in such a way that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures which ensure that the personal data are not attributed to an identified or identifiable natural person;

22.7. Responsible:

„Controller“ means the natural or legal person, public authority, agency or other body which alone or jointly with others determines the purposes and means of the processing of personal data.

22.8. Processing:

„Processing“ means any operation or set of operations which is performed upon personal data, whether or not by automatic means. The term is broad and covers virtually any handling of data, be it collection, analysis, storage, transmission or erasure.

Status: 27.10.2023