

Privacy Notice for the Websites of iwis SE & Co. KG

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1. General Information

The protection of your personal data is an important concern for us. In this privacy notice, we inform you about how we collect, process, store, and protect the information and data you entrust to us.

1.1. Controller and Contact Information

The controller responsible for processing your personal data is:

iwis SE & Co. KG
Albert-Roßhaupter-Str. 53
81369 Munich, Germany
E-Mail: info@iwis.com

1.2. Data Protection Officer

If you have any questions regarding data protection, you may contact our Data Protection Officer using the following contact details:

Mailing address: ben digital services GmbH

Mr. Ben Hansen
Schloßstraße 19
82031 Grünwald
Germany

E-Mail: datenschutz@iwis.com

1.3. Legal Basis for the Processing of Personal

According to data protection regulations, the processing of personal data is only permissible if it is based on a legal foundation. The following legal bases apply to the data processing operations we carry out:

- Art. 6 Abs. 1 S. 1 lit. a DS-GVO („Consent“):

The data subject may voluntarily, in an informed and unambiguous manner, give consent by declaration or other affirmative action, indicating that they agree to the processing of their personal data for one or more specific purposes.

- Art. 6 Abs. 1 S. 1 lit. b DS-GVO:

The processing of personal data may be necessary for the performance of a contract to which the data subject is a party or to take steps prior to entering into a contract at the request of the data subject.

- Art. 6 Abs. 1 S. 1 lit. c DS-GVO

Processing may be necessary for compliance with a legal obligation to which we or another controller is subject (e.g., statutory retention obligations).

- Art. 6 Abs. 1 S. 1 lit. e DS-GVO:

Processing may be necessary for the performance of a task carried out in the public interest.

- Art. 6 Abs. 1 S. 1 lit. f DS-GVO („legitimate interests“)

Processing may be necessary for the purposes of legitimate interests pursued by us or a third party, particularly legal or economic interests, provided these are not overridden by the interests or fundamental rights and freedoms of the data subject.

For each data processing activity we undertake, we specify the applicable legal basis. A processing activity may also be based on multiple legal grounds.

1.4. Storage Duration and Data Deletion

For each data processing activity we describe below, we indicate how long the data will be stored and when it will be deleted or restricted. If no explicit storage period is specified, the personal data processed will be deleted or restricted as soon as the purpose or legal basis for storage no longer applies.

In the event of a (threatened) legal dispute with you or any other legal proceeding, or if storage is required by statutory provisions (in particular retention obligations under Sections 257 and 147 of the German Commercial Code), we will retain the personal data beyond the specified time. Once the legally required retention period has expired, we will delete the personal data unless further storage is required and there is a legal basis for continued processing.

1.5. Data Security

We employ appropriate technical and organizational security measures to protect the data we process against accidental or intentional manipulation, partial or total loss, destruction, or unauthorized access by third parties. When selecting and implementing these security measures, we consider the current state of technology, the existing risks of data breaches, and the probability and impact of such breaches on affected individuals. We continuously improve our security measures in line with technological developments.

If you would like more information about our security measures, please contact our Data Protection Officer (see section 1.2).

1.6. Disclosure of Personal Data to Third Parties

If we work with external service providers as part of our website operations, they act solely on our instructions and are contractually obligated under Article 28 of the GDPR to comply with data protection regulations.

If personal data is transferred by us to our subsidiaries, or from our subsidiaries to us, such

transfer is also based on existing data processing agreements, for which contracts in accordance with Article 28 of the GDPR have also been concluded.

1.7. Transfer of Personal Data to Third Countries

If we transfer personal data to recipients located outside the European Union or the European Economic Area (so-called third countries), we ensure prior to such transfer that the recipient guarantees an adequate level of data protection through appropriate (contractual) safeguards, such as the currently applicable Standard Contractual Clauses or other recognized agreements, or that an informed consent has been given, including a reference to the potential risks of such data transfers.

1.8. No Automated Decision-Making

Your personal data is not used for any procedures involving automated decision-making (including profiling).

1.9. Your Rights

Under data protection regulations (GDPR, BDSG), you have the following rights as a data subject. You may exercise these rights by sending a notice (in person, via email, or by post) to the contact addresses listed in Section 1 or the Data Protection Officer listed in Section 1.2. These rights — except for the right to withdraw consent — are not absolute and may depend on the specific circumstances of your case.

1.9.1. Right of Access

You have the right to request information on whether personal data about you is being processed. If this is the case, you may request access to this data, including information on the purposes of processing, the categories of personal data concerned, and the recipients or categories of recipients to whom the data is disclosed. You also have the right to obtain a copy of the personal data undergoing processing.

1.9.2. Right to Rectification

You have the right to request the correction of inaccurate personal data concerning you. Depending on the purpose of the processing, you also have the right to request the completion of incomplete personal data, including by means of a supplementary statement.

1.9.3. Right to Erasure

In certain cases, you have the right to request the deletion of your personal data, and we may be obligated to comply with such requests.

1.9.4. Right to Restriction of Processing

Under certain conditions, you have the right to request that the processing of your personal data be restricted. If granted, we will label such data accordingly and only process it for specific purposes.

1.9.5. Right to Data Portability

In certain cases, you have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used, and machine-readable format. If applicable, you also have the right to transmit this data to another controller without hindrance.

1.9.6. Right to Object

You have the right to object at any time to the processing of your personal data by us on grounds relating to your particular situation, provided the processing is based on Article 6(1)(e) or (f) of the GDPR. In such cases, we may be obliged to cease processing your personal data.

1.9.7. Withdrawal of Consent

If you have given us consent for specific processing activities, you may withdraw that consent at any time with future effect. The withdrawal does not affect the legality of the processing carried out before the withdrawal. If you wish to withdraw your consent, please contact us using the contact details listed above.

1.9.8. Right to Lodge a Complaint

You also have the right to lodge a complaint with the competent data protection supervisory authority regarding the processing of your personal data. For us, this is: **The Bavarian Data Protection Authority (BayLDA)**
Promenade 27
91522 Ansbach
Germany

1.10. Changes to This Privacy Notice

We regularly review this privacy notice and make updates where necessary to keep it current with developments in data protection law and technological or organizational changes.

2. Websites

At www.iwis.com and other iwis websites, including all associated subpages (hereinafter collectively referred to as “the website”), you will find information about our company and the services we offer. Below, we explain how your personal data is processed in connection with the use of our website.

2.1. Categories of personal data concerned, purposes and legal basis of processing, storage duration

In connection with the use of the website, we only process such personal data of users that is directly collected during the use of the website. The purposes and legal basis for data processing depend on the respective functionality of the website. Below, the processing of your personal data in connection with the use of the website is described in more detail:

Purpose of Processing	Categories of Personal Data	Legal Basis for Processing	Retention Period
Logging of website access in the form of log files for the analysis of user messages as well as attack and defense analysis	<ul style="list-style-type: none"> ▪ Time of access ▪ IP address of the user 	Protection of overriding legitimate interests (Art. 6 (1) lit. f) GDPR)	30 Days
Communication with you in webinars as part of product training	<ul style="list-style-type: none"> ▪ Name ▪ E-Mail ▪ Company information 	Registration for the webinar takes place only with your consent (Art. 6 (1) lit. a) GDPR)	Your data will be stored until the event has taken place.

Your personal data will only be processed for other purposes if we are legally obligated to do so (e.g., transmission of personal data to courts or law enforcement authorities), if you have given your consent to the processing, or if the processing is otherwise permissible under applicable law.

You may choose not to provide certain categories of personal data. However, this may result in us being unable to offer you certain functions and content on this website, or only to a limited extent, and your use of the website and its features may be restricted.

2.2. Recipients and Authorized Access

We share your personal data within our company only with those departments and individuals who require this data for the analysis of user messages and for attack and defense analysis (e.g., IT staff).

Disclosure of data to recipients outside the company only takes place if permitted or required by legal provisions, if the disclosure is necessary for the analysis of user messages or for attack and defense analysis, if we have your consent (where required), if we are authorized to provide information, or if the transfer is necessary to protect the legitimate interests of the company.

Your personal data will not be transferred to service providers outside the European Union.

The categories of recipients may include:

Recipient	Purpose of Data Processing	What Security Measures Are Taken for International Transfers if the Recipient Is Located Outside the European Economic Area (EEA)?
Service providers for the operation of the online portal and the processing of data stored or transmitted by the systems (e.g., data center services, IT security)	The processing is carried out to ensure the operation of the online portal and the IT security of iwis, particularly to protect against network attacks.	Data is only transferred to recipients located in third countries for which an adequacy decision by the European Commission exists.

Unter Umständen übermitteln wir Ihre personenbezogenen Daten auch an Regierungsbehörden, Gerichte, externe Berater und andere Dritte, soweit dies gesetzlich erforderlich oder gestattet ist, um:

- ensure compliance with applicable laws,
- respond to requests from authorities,
- comply with valid legal procedures,
- protect and enforce the rights, safety, privacy, or property of iwis, website visitors, iwis customers, our employees, or the public,
- enable us to pursue available legal remedies or limit any damages we may suffer,
- enforce the terms of use for our online services, and
- respond to emergencies.auf Anfragen von Behörden zu antworten,

Such data transfers are permissible pursuant to Article 6(1)(c) and/or Article 6(1)(f) of the GDPR.

3. Use of Cookies on the Website

We use cookies on our website. Cookies are data records sent by the web server to the user's browser and stored there. We use both session cookies and persistent cookies. A session cookie disappears after you close your browser. A persistent cookie remains stored after the browser is closed and can be used by your browser during subsequent visits to our website.

Your web browser may offer certain options regarding cookies. Please note that if you delete or do not accept cookies, you may not be able to use all the features of the website in full.

Some of the cookies we use are necessary for a user-friendly display of the website, while others are used for analytical purposes, such as gathering information about user behavior and their devices. This information helps us to tailor the website to users' needs.

If the use of cookies is not technically necessary, such cookies will only be used with your explicit consent. Upon your first visit to the website, you will be asked whether you agree to the use of such cookies.

A detailed overview of the cookies used is generated dynamically and displayed in tabular form each time the website is accessed.

You can access the current list here:

<https://www.iwis.com/de-de/datenschutz#CookieDeclarationChangeConsentChange>

The list provides information on the name, purpose, and storage duration of each cookie. The cookies are also categorized. The "Necessary" category cannot be deselected and is technically essential for the operation of this website. All other categories can be deselected. In that case, the cookies will be deactivated, and no data will be collected.

Kommentiert [AM1]: Bitte Link prüfen und ggf korrigieren. Hier sollte direkt auf die Tabelle, die der Cookie-Bot erstellt, verlinkt werden.

4. Customers, Suppliers (“Business Partners”)

If you are our business partner, we process your data.

In this section, we explain how we process your personal data in connection with the contractual relationship.

4.1. Categories of Personal Data Concerned / Sources of Data

We only process data that is related to the initiation and conclusion of a contract, as well as data relevant for its invoicing, delivery, and execution. This includes data about you, your company, and the goods and services you have requested.

We process personal data that you provide to us for the purpose of initiating and concluding a contract or that we create in the course of fulfilling the contract.

Which data is processed:

Type of Personal Data	How Do We Obtain the Data?	Are These Special Categories of Personal Data? (Y/N)
Name of your company, your name, the name of your company, as well as your email address	You provide this data when initiating contact and when placing an order or concluding a contract, or as part of your contact or callback request	No
Voluntary information about your company and yourself – salutation, location, company address, telephone number, department, and, in the context of a contact request, your inquiry	You provide this data by filling out the contact request form	No

4.2. Purposes and Legal Basis for Data Processing

We process the aforementioned personal data to the extent necessary for the initiation, conclusion, and execution of the contract. The legal basis for this is:

- GDPR Art. 6(1)(a) based on your consent, although consent is generally not required for concluding or continuing an existing contract,
- GDPR Art. 6(1)(b) for the establishment, performance, and termination of a contractual relationship,
- GDPR Art. 6(1)(c) to fulfill a legal obligation,
- GDPR Art. 6(1)(f) to protect a legitimate interest. DS-GVO Art. 6 Abs. 1 lit. b) zur Begründung, der Durchführung und der Beendigung eines Vertragsverhältnisses,

We process your personal data only within the legally permissible framework. The following table lists the purposes and legal bases for which we process your personal data:

Purpose of Data Processing	Legal Basis for Processing	Storage Duration
Management of the business relationship: conclusion of the contract, contacting, responding to inquiries, managing the customer or supplier account, general customer/supplier information, handling complaints	<p>The legal bases for processing include:</p> <ul style="list-style-type: none"> the performance of a contract (Art. 6(1)(b) GDPR), the protection of the legitimate interests of the company (business operations and licensee management, Art. 6(1)(f) GDPR). 	Inquiries are usually retained for the duration of processing your request, unless there are statutory or other retention obligations; contract data is retained for up to 10 years after the end of the contract.

4.3. Retention Period

We store your personal data in accordance with applicable data protection regulations only as long as necessary to fulfill our obligations, particularly those arising from the contract, and only as long as necessary to achieve the purposes for which your personal data were collected.

Due to commercial and tax law requirements, we may be obliged to store your personal data longer than necessary for the purposes stated above. The regular retention periods for the purposes for which we process your personal data can be found in the table presented in section 4.2.

If we determine that there is no longer any need or requirement to retain your personal data, we will cease processing such data and, in accordance with applicable laws or internal policies, delete them from our systems and/or take measures to properly anonymize the data, unless we need to retain your data to comply with legal or regulatory obligations to which we are subject.

4.4. Recipients and Authorized Access

We share your personal data within our company only with those departments and individuals who require this data for the initiation, conclusion, and execution of the contract, as well as for asserting or defending claims (e.g., employees of the shipping department, legal department, finance and accounting, etc.).

Data will only be disclosed to recipients outside the company if permitted or required by law, if disclosure is necessary for the initiation, conclusion, and execution of the contract, if we have your consent (where required), if we are authorized to provide information, or if the transfer is necessary to protect the legitimate interests of the company. Your personal data will not be transferred to service providers outside the European Union unless necessary for the performance of the contract.

Additionally, your personal data may also be processed on our behalf based on data processing agreements pursuant to Article 28 GDPR. In these cases, we ensure that the processing of personal data is carried out in accordance with the provisions of the GDPR.

5. Applicant Portal

If you apply for a job with us via the applicant portal on our website, we process the following personal data about you as part of the application process: salutation, first and last name, email, and resume. If you voluntarily provide us with additional personal data (title, address, telephone number, mobile phone number, cover letter, application photo, certificates, and other documents), we also process these within the framework of the application process.

5.1. Purposes and Legal Basis of Data Processing

We process the aforementioned personal data only to initiate an application procedure. The data serves to contact you to arrange a personal interview and to assess your suitability for the job.

In the event of legal disputes related to the application process, the data also serves as evidence to assert or defend claims. The possibility to defend or assert claims constitutes a legitimate interest for us.

If your application is successful, we use your data to contact you to establish the employment relationship.

The legal basis for processing your personal data is Art. 88 GDPR in conjunction with § 26 (1) Federal Data Protection Act (BDSG) and Art. 6 (1) lit. b and f GDPR. Regarding the processing of special categories of personal data (see 3.), the processing is based on Art. 88 GDPR in conjunction with § 26 (3) BDSG.

5.2. Retention Period

We store your personal data in accordance with applicable data protection regulations only as long as necessary to carry out the application process. Since there is a possibility of legal disputes after the conclusion of an application process, we retain the data even after the procedure ends for the purpose of evidence preservation. Your personal data is usually deleted 6 months after the conclusion of the application process.

If your application is successful, we will continue processing the data necessary to conclude the employment contract. The retention periods applicable to employee personal data then apply. You will be informed about these periods upon conclusion of the employment contract. Data that is not necessary for concluding the employment contract will also be deleted 6 months after the conclusion of the application process, for the reasons stated above.

5.3. Recipients and Authorized Access

We only share your personal data within our corporate group with departments and persons who need this data to carry out the application process (HR department, responsible specialist department).

Data transfer to recipients outside the corporate group only occurs to the extent that legal provisions permit or require this, the transfer is necessary for the application process, your consent has been given, we are obliged to provide information, or the transfer is to protect legitimate interests of the company. Personal data will not be transferred to service providers outside the European Union unless the application process requires travel to one of our non-European subsidiaries.

In addition, your personal data is also processed on our behalf based on data processing agreements under Art. 28 GDPR. In these cases, we ensure that the processing of personal data complies with the provisions of the GDPR.

6. Use of Social Media Plugins

On our website, we use a plugin from the social network LinkedIn, operated by LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland. The plugin is identifiable by the LinkedIn logo.

6.1. Purpose and Legal Basis

The plugin allows you to link content from our website directly with your LinkedIn profile or to visit our company page on LinkedIn. The use is based on our legitimate interest pursuant to Art. 6 (1) lit. f GDPR in an appealing presentation of our online offer and simple interaction with our visitors and their professional network.

6.2. Data Processing by LinkedIn

When you visit a page with an integrated LinkedIn plugin, a connection is made to LinkedIn's servers. LinkedIn is informed about which of our pages you visited. If you are logged into your LinkedIn account at the same time, LinkedIn can associate the visit with your user account. If you interact with the plugin (e.g., by clicking the "Share" button), this information is also sent directly to a LinkedIn server and stored there.

LinkedIn also processes personal data in the USA. The data transfer is based on the EU Commission's adequacy decision according to Art. 45 GDPR. LinkedIn is certified under the EU-U.S. Data Privacy Framework and relies on the standard contractual clauses approved by the European Commission for the transfer of personal data from the EU.

Further information on data processing by LinkedIn can be found in LinkedIn's privacy policy at

<https://www.linkedin.com/legal/privacy-policy>

7. Use of Analytics Services

Our website uses the web analytics service Google Analytics, provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("Google").

7.1. Purpose and Legal Basis

Google Analytics uses cookies and similar technologies to analyze the use of our website. This allows us to find out, among other things, when pages were visited and from which regions. The analysis also serves to regularly improve our website. The information obtained helps us make our offer more user-friendly and effective. Processing takes place based on your consent under Art. 6 (1) lit. a GDPR, which you can give in the cookie banner settings when you visit our website.

7.2. IP Anonymization and Privacy-Friendly Configuration

We have configured Google Analytics so that your IP address is only recorded in a truncated form (so-called IP anonymization). This excludes direct personal identification. In addition, we have disabled all unnecessary functions and limited data retention to the necessary minimum.

7.3. Data Processing Agreement and Data Transfer to Third Countries

A data processing agreement pursuant to Art. 28 GDPR has been concluded with Google. Google also processes your data in the USA. The transfer is based on the EU-U.S. Data Privacy Framework, as Google LLC is certified accordingly (Art. 45 GDPR).

7.4. Revocation of Consent

You can revoke your consent at any time with effect for the future by accessing the cookie settings via the link in the footer of our website and adjusting your preferences. Further information about data processing by Google can be found at

<https://policies.google.com/privacy>

8. Use of YouTube

Our website embeds videos hosted on the YouTube platform. The provider of YouTube is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

8.1. Purpose and Legal Basis

Embedding is done for an appealing presentation of our online offers and to better convey information. The legal basis is your consent according to Art. 6 (1) lit. a GDPR, which you can grant via our cookie banner or cookie consent tool.

8.2. Privacy-Friendly Embedding

We use YouTube's extended privacy mode. This means the video is embedded via the domain youtube-nocookie.com. Thus, when you simply visit a page with an embedded video, no cookies are set and no personal data is transmitted to YouTube—only when you actively play the video is a connection made to YouTube's servers.

8.3. Data Processing by YouTube

When you play a video, YouTube may process personal data, especially your IP address and possibly information about your user behavior. If you are logged into a Google account, this can be associated with your profile. Data processing is the responsibility of Google. Further information can be found in Google's privacy policy at

<https://policies.google.com/privacy>

9. Use of Google Maps

On our website, we use maps from the service "Google Maps." The service provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. Using the functions of Google Maps requires processing your IP address. The use of Google Maps serves the legitimate interest of an appealing presentation of our website and easy findability of the locations we indicate on the website. This constitutes a legitimate interest within the meaning of Art. 6 (1) lit. f GDPR.

More information on handling user data can be found in Google's privacy policy at

<https://policies.google.com/privacy?hl=de#intro>