Privacy policy

1. Name and contact details of the controller and the company data protection officer

This data protection information applies to data processing by

Responsible person:

Tobias Stumpf, Jägerstraße 90, 70806 Kornwestheim, <u>info(at)gluckerkolleg.de</u>, 07154 / 800 506 0.

The company data protection officer of GluckerKolleg can be contacted at the above address, for the attention of Tobias Stumpf, or on 07154 / 800 506 0.

2. Collection and storage of personal data and the nature and purpose of their use

a) When visiting the website

When you visit our website www.gluckerkolleg.de and www.glucker.de, the browser used on your device automatically sends information to the server of our website. This information is temporarily stored in a so-called log file. The following information is collected without any action on your part and stored until it is automatically deleted:

IP address of the requesting computer,

Date and time of access,

Name and URL of the accessed file.

Website from which the access is made (referrer URL),

browser used and, if applicable, the operating system of your computer and the name of your access provider. The aforementioned data is processed by us for the following purposes

Ensuring a smooth connection to the website,

Ensuring a comfortable use of our website,

evaluating system security and stability and

for other administrative purposes.

The legal basis for data processing is Art. 6 para. 1 sentence 1 lit. f GDPR. Our legitimate interest follows from the data collection purposes listed above. Under no circumstances do we use the data collected for the purpose of drawing conclusions about your person. We also use cookies and analysis services when you visit our website. You can find more detailed explanations on this in sections 4 and 5 of this privacy policy.

b) Newsletter

If you have expressly consented in accordance with Art. 6 para. 1 sentence 1 lit. a GDPR, we will use your email address to send you our newsletter on a regular basis. You can unsubscribe at any time, for example via a link at the end of each newsletter. Alternatively, you can also send your unsubscribe request to info(at)gluckerkolleg.de by email at any time.

If you subscribe to our company's newsletter, the data in the respective input mask will be transmitted to the controller. Subscription to our newsletter takes place in a so-called double opt-in procedure. This means that after registering, you will receive an email asking you to confirm your registration. This confirmation is necessary so that no-one can register with other people's email addresses. When registering for the newsletter, the user's IP address and the date and time of registration are stored. This serves to prevent misuse of the services or the e-mail address of the person concerned. The data is not passed on to third parties. An exception is made if there is a legal obligation to pass on the data. The data is used exclusively for sending the newsletter. Subscription to the newsletter can be terminated by the data subject at any time. Consent to the storage of personal data can also be revoked at any time. There is a corresponding link for this purpose in every newsletter. The legal basis for the processing of data after registration for the newsletter by the user is Art. 6 para. 1 lit. a) GDPR if the user has given consent. The legal basis for sending the newsletter as a result of the sale of goods or services is Section 7 (3) UWG.

bb) Use of rapidmail

Description and purpose: We use rapidmail to send newsletters. The provider is rapidmail GmbH, Wentzingerstraße 21, 79106 Freiburg, Germany. Among other things, rapidmail is used to organize and analyze the sending of newsletters. The data you enter for the purpose of subscribing to the newsletter is stored on rapidmail's servers in Germany. If you do not wish to be analyzed by rapidmail, you must unsubscribe from the newsletter. For this purpose, we provide a corresponding link in every newsletter message. For the purpose of analysis, the emails sent with rapidmail contain a so-called tracking pixel, which connects to the rapidmail servers when the email is opened. In this way, it can be determined whether a newsletter message has been opened. We can also use rapidmail to determine whether and which links in the newsletter message have been clicked on. Optionally, links in the email can be set as tracking links with which your clicks can be counted.

Legal basis: The legal basis for data processing is Art. 6 para. 1 lit. a) GDPR.

Recipient: The recipient of the data is rapidmail GmbH.

Transfer to third countries: Data is not transferred to third countries.

Duration: The data stored by us as part of your consent for the purpose of the newsletter will be stored by us until you unsubscribe from the newsletter and deleted from both our servers and the servers of rapidmail after you unsubscribe from the newsletter. Data stored by us for other purposes (e.g. e-mail addresses for the member area) remain unaffected by this.

Revocation option: You have the option to revoke your consent to data processing at any time with effect for the future. The legality of the data processing operations that have already taken place remains unaffected by the revocation.

Further data protection information: For more information, please refer to rapidmail's data security information at: https://www.rapidmail.de/datensicherheit. For more information on the analysis functions of rapidmail, please see the following link: https://www.rapidmail.de/hilfe

c) When using our contact form

For questions of any kind, we offer you the opportunity to contact us via a form provided on the website. It is necessary to provide a valid e-mail address so that we know who sent the request and can answer it. Further information can be provided voluntarily. Data processing for the purpose of contacting us is carried out in accordance with Art. 6 para. 1 sentence 1 lit. a GDPR on the basis of your voluntarily given consent. The personal data collected by us for the use of the contact form will be automatically deleted after your inquiry has been dealt with.

3. Disclosure of data

Your personal data will not be transferred to third parties for purposes other than those listed below. We only pass on your personal data to third parties if:

you have given your express consent in accordance with Art. 6 para. 1 sentence 1 lit. a GDPR,

the disclosure pursuant to Art. 6 para. 1 sentence 1 lit. f GDPR is necessary for the assertion, exercise or defense of legal claims and there is no reason to assume that you have an overriding interest worthy of protection in not disclosing your data,

in the event that there is a legal obligation for disclosure pursuant to Art. 6 para. 1 sentence 1 lit. c GDPR, and

this is legally permissible and necessary for the processing of contractual relationships with you in accordance with Art. 6 para. 1 sentence 1 lit. b GDPR.

4. Cookies

We use cookies on our website. These are small files that your browser automatically creates and that are stored on your end device (laptop, tablet, smartphone, etc.) when you visit our website. Cookies do not cause any damage to your end device and do not contain any viruses, Trojans or other malware. Information is stored in the cookie that results in each case in connection with the specific end device used. However, this does not mean that we obtain direct knowledge of your identity. On the one hand, the use of cookies serves to make the use of our website more convenient for you. For example, we use so-called session cookies to recognize that you have already visited individual pages of our website. These are automatically deleted after you leave our site. In addition, we also use temporary cookies to optimize userfriendliness, which are stored on your end device for a specified period of time. If you visit our site again to make use of our services, it is automatically recognized that you have already visited us and which entries and settings you have made so that you do not have to enter them again. On the other hand, we use cookies to statistically record the use of our website and to evaluate it for the purpose of optimizing our offer for you (see section 5). These cookies enable us to automatically recognize that you

have already visited our website when you visit it again. These cookies are automatically deleted after a defined period of time. The data processed by cookies is required for the purposes mentioned to protect our legitimate interests and those of third parties in accordance with Art. 6 para. 1 sentence 1 lit. f GDPR. Most browsers accept cookies automatically. However, you can configure your browser so that no cookies are stored on your computer or a message always appears before a new cookie is created. However, completely deactivating cookies may mean that you cannot use all the functions of our website.

5. Analysis tools

a) Tracking tools

The tracking measures listed below and used by us are carried out on the basis of Art. 6 para. 1 sentence 1 lit. f GDPR. With the tracking measures used, we want to ensure a needs-based design and the continuous optimization of our website. On the other hand, we use the tracking measures to statistically record the use of our website and to evaluate it for the purpose of optimizing our offer for you. These interests are to be regarded as legitimate within the meaning of the aforementioned provision. The respective data processing purposes and data categories can be found in the corresponding tracking tools.

i) Google Analytics

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

Google Analytics enables the website operator to analyze the behavior of website visitors. The website operator receives various usage data, such as page views, length of visit, operating systems used and origin of the user. This data is summarized in a user ID and assigned to the respective end device of the website visitor.

We can also use Google Analytics to record your mouse and scroll movements and clicks, among other things. Google Analytics also uses various modeling approaches to supplement the collected data records and uses machine learning technologies for data analysis.

Google Analytics uses technologies that enable the recognition of the user for the purpose of analyzing user behavior (e.g. cookies or device fingerprinting). The information collected by Google about the use of this website is generally transmitted to a Google server in the USA and stored there.

The use of this service is based on your consent in accordance with Art. 6 para. 1 lit. a GDPR and § 25 para. 1 TTDSG. Consent can be revoked at any time.

Data transfer to the USA is based on the standard contractual clauses of the EU Commission. You can find details here:

https://privacy.google.com/businesses/controllerterms/mccs/.

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 USA that is intended to ensure compliance with European data protection standards for data processing in the USA. Every company certified under the DPF undertakes to comply with these data protection standards. Further information on this can be obtained from the provider at the following link:

https://www.dataprivacyframework.gov/s/participant-search/participant-detail?contact=true&id=a2zt00000001L5AAI&status=Active

ii) Google Conversion Tracking

This website uses Google Conversion Tracking. The provider is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

With the help of Google conversion tracking, Google and we can recognize whether the user has performed certain actions. For example, we can evaluate which buttons on our website were clicked how often and which products were viewed or purchased particularly frequently. This information is used to create conversion statistics. We find out the total number of users who have clicked on our ads and what actions they have taken. We do not receive any information with which we can personally identify the user. Google itself uses cookies or comparable recognition technologies for identification purposes.

The use of this service is based on your consent in accordance with Art. 6 para. 1 lit. a GDPR and § 25 para. 1 TTDSG. Consent can be revoked at any time.

You can find more information about Google Conversion Tracking in Google's privacy policy: https://policies.google.com/privacy?hl=de.

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 USA that is intended to ensure compliance with European data protection standards for data processing in the USA. Every company certified under the DPF undertakes to comply with these data protection standards. Further information on this can be obtained from the provider at the following link:

https://www.dataprivacyframework.gov/s/participant-search/participant-detail?contact=true&id=a2zt00000001L5AAI&status=Active

iii) Google Ads

The website operator uses Google Ads. Google Ads is an online advertising program of Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

Google Ads enables us to display advertisements in the Google search engine or on third-party websites when the user enters certain search terms on Google (keyword targeting). Furthermore, targeted advertisements can be displayed based on the user data available at Google (e.g. location data and interests) (target group targeting). As the website operator, we can evaluate this data quantitatively by analyzing, for

example, which search terms led to the display of our advertisements and how many advertisements led to corresponding clicks.

The use of this service is based on your consent in accordance with Art. 6 para. 1 lit. a GDPR and § 25 para. 1 TTDSG. Consent can be revoked at any time.

Data transfer to the USA is based on the standard contractual clauses of the EU Commission. Details can be found here:

https://policies.google.com/privacy/frameworks_and https://privacy.google.com/businesses/controllerterms/mccs/.

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 USA, which is intended to ensure compliance with European data protection standards when processing data in the USA. Every company certified under the DPF undertakes to comply with these data protection standards. Further information on this can be obtained from the provider at the following link:

https://www.dataprivacyframework.gov/s/participant-search/participant-detail?contact=true&id=a2zt00000001L5AAI&status=Active

6. Social media plug-ins

We use social plug-ins from the social networks Facebook, X and Instagram on our website on the basis of Art. 6 para. 1 sentence 1 lit. f GDPR in order to make our company better known. The underlying advertising purpose is to be regarded as a legitimate interest within the meaning of the GDPR. Responsibility for data protection-compliant operation must be guaranteed by their respective providers. We integrate these plug-ins using the so-called two-click method in order to protect visitors to our website in the best possible way.

a) Facebook

Social media plugins from Facebook are used on our website to make their use more personal. We use the "LIKE" or "SHARE" button for this purpose. This is an offer from Facebook. When you visit a page on our website that contains such a plugin, your browser establishes a direct connection with the Facebook servers. The content of the plugin is transmitted by Facebook directly to your browser, which integrates it into the website. By integrating the plugins, Facebook receives the information that your browser has accessed the corresponding page of our website, even if you do not have a Facebook account or are not currently logged in to Facebook. This information (including your IP address) is transmitted directly from your browser to a Facebook server in the USA and stored there. If you are logged in to Facebook, Facebook can directly associate your visit to our website with your Facebook account. If you interact with the plugins, for example by clicking the "LIKE" or "SHARE" button, the corresponding information is also transmitted directly to a Facebook server and stored there. The information is also published on Facebook and displayed to your Facebook friends. Facebook can use this information for the purposes of advertising, market research and the needs-based design of Facebook

pages. For this purpose, Facebook creates usage, interest and relationship profiles, e.g. to evaluate your use of our website with regard to the advertisements displayed to you on Facebook, to inform other Facebook users about your activities on our website and to provide other services associated with the use of Facebook. If you do not want Facebook to assign the data collected via our website to your Facebook account, you must log out of Facebook before visiting our website. For the purpose and scope of data collection and the further processing and use of the data by Facebook, as well as your rights in this regard and setting options for protecting your privacy, please refer to Facebook's data protection information (https://www.facebook.com/about/privacy/).

b) Instagram

Our website also uses social plugins ("plugins") from Instagram, which is operated by Instagram LLC, 1601 Willow Road, Menlo Park, CA 94025, USA ("Instagram"). The plugins are marked with an Instagram logo, for example in the form of an "Instagram" camera". When you access a page on our website that contains such a plugin, your browser establishes a direct connection to Instagram's servers. The content of the plugin is transmitted by Instagram directly to your browser and integrated into the page. Through this integration, Instagram receives the information that your browser has accessed the corresponding page of our website, even if you do not have an Instagram profile or are not currently logged in to Instagram. This information (including your IP address) is transmitted directly from your browser to an Instagram server in the USA and stored there. If you are logged in to Instagram, Instagram can directly associate your visit to our website with your Instagram account. If you interact with the plugins, for example by clicking the "Instagram" button, this information is also transmitted directly to an Instagram server and stored there. The information is also published on your Instagram account and displayed there to your contacts. If you do not want Instagram to assign the data collected via our website directly to your Instagram account, you must log out of Instagram before visiting our website. You can find more information on this in Instagram's privacy policy (https://help.instagram.com/155833707900388).

c) YouTube

Our website integrates videos and links from the YouTube website. The operator of the website is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

When you visit one of these websites on which YouTube is integrated, a connection to the YouTube servers is established. The YouTube server is informed which of our pages you have visited. If you are logged into your YouTube account, you enable YouTube to assign your surfing behavior directly to your personal profile. You can prevent this by logging out of your YouTube account.

We use YouTube in extended data protection mode. According to YouTube, videos that are played in extended data protection mode are not used to personalize surfing

on YouTube. Ads that are played in extended data protection mode are also not personalized. No cookies are set in extended data protection mode. Instead, however, so-called local storage elements are stored in the user's browser, which contain personal data similar to cookies and can be used for recognition. Details on the extended data protection mode can be found here: https://support.google.com/youtube/answer/171780.

After activating a YouTube video, further data processing operations may be triggered over which we have no influence.

The use of YouTube is in the interest of an appealing presentation of our offers. This constitutes a legitimate interest within the meaning of Art. 6 para. 1 lit. f GDPR. If a corresponding consent has been requested, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a GDPR and § 25 para. 1 TTDSG, insofar as the consent includes the storage of cookies or access to information in the user's terminal device (e.g. device fingerprinting) within the meaning of the TTDSG. Consent can be revoked at any time.

You can find more information about data protection at YouTube in their privacy policy at: https://policies.google.com/privacy?hl=de.

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 USA that is intended to ensure compliance with European data protection standards for data processing in the USA. Every company certified under the DPF undertakes to comply with these data protection standards. Further information on this can be obtained from the provider at the following link:

https://www.dataprivacyframework.gov/s/participant-search/participant-detail?contact=true&id=a2zt00000001L5AAI&status=Active

7. Rights of data subjects

You have the right to

to request information about your personal data processed by us in accordance with Art. 15 GDPR. In particular, you can request information about the purposes of processing, the category of personal data, the categories of recipients to whom your data has been or will be disclosed, the planned storage period, the existence of a right to rectification, erasure, restriction of processing or objection, the existence of a right to lodge a complaint, the origin of your data if it was not collected by us, and the existence of automated decision-making including profiling and, if applicable, meaningful information about its details;

in accordance with Art. 16 GDPR, to demand the immediate correction of incorrect or incomplete personal data stored by us; - in accordance with Art. 17 GDPR, to demand the deletion of your personal data stored by us, unless the processing is necessary to exercise the right to free expression of opinion and information, to fulfill a legal obligation, for reasons of public interest or to assert, exercise or defend legal claims;

in accordance with Art. 18 GDPR, to demand the restriction of the processing of your personal data if the accuracy of the data is disputed by you, the processing is unlawful, but you refuse to delete it and we no longer need the data, but you need it to assert, exercise or defend legal claims or you have lodged an objection to the processing in accordance with Art. 21 GDPR

in accordance with Art. 20 GDPR, to receive your personal data that you have provided to us in a structured, commonly used and machine-readable format or to request that it be transmitted to another controller

in accordance with Art. 7 para. 3 GDPR, to withdraw your consent once given to us at any time. The consequence of this is that we may no longer continue the data processing based on this consent in the future and

to lodge a complaint with a supervisory authority in accordance with Art. 77 GDPR. As a rule, you can contact the supervisory authority of your usual place of residence or workplace or the registered office of our company.

8. Right to object

If your personal data is processed on the basis of legitimate interests in accordance with Art. 6 para. 1 sentence 1 lit. f GDPR, you have the right to object to the processing of your personal data in accordance with Art. 21 GDPR, provided that there are reasons for this arising from your particular situation or the objection is directed against direct advertising. In the latter case, you have a general right to object, which will be implemented by us without specifying a particular situation. If you wish to exercise your right of revocation or objection, simply send an e-mail to info(at)gluckerkolleg.de

9. Data security

We use the widespread SSL (Secure Socket Layer) method in conjunction with the highest level of encryption supported by your browser when you visit our website. As a rule, this is 256-bit encryption. If your browser does not support 256-bit encryption, we use 128-bit v3 technology instead. You can tell whether an individual page of our website is transmitted in encrypted form by the closed display of the key or lock symbol in the lower status bar of your browser. We also use suitable technical and organizational security measures to protect your data against accidental or intentional manipulation, partial or complete loss, destruction or against unauthorized access by third parties. Our security measures are continuously improved in line with technological developments.

10. Topicality and amendment of this privacy policy

This privacy policy is currently valid and is dated May 2024. It may become necessary to amend this privacy policy as a result of the further development of our website and offers on it or due to changes in legal or official requirements. You can access and print out the current privacy policy at any time on the website at www.gluckerkolleg.de and www.glucker.de.