

# Data protection declaration

Valid from 01/05/2022

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## 1. Controller

The controller is the individual or entity which, alone or jointly with others, determines the purposes and methods of the processing of personal data.

The controller for data processing on this website is:

### **Aug. Winkhaus GmbH & Co. KG**

Registered company location: Telgte

Münster District Court, HRA 6525 Münster, Germany

Partner: Winkhaus Verwaltungs- und Beteiligungsgesellschaft mbH, Münster District Court, HRB 9553 Münster

VAT no. DE 126046759

Executive board: Sofie Winkhaus, Tilmann Winkhaus, Stefan Wemhoff

Telephone: +49 2504 921 0

E-mail: info@winkhaus.de

## 2. General instructions

### **2.1 General information on the legal basis for data processing on this website**

If you have consented<sup>1</sup> to data processing, we process your personal data on the basis of Art. 6 (1) lit. a GDPR or Art. 9 (2) lit. a GDPR, if special categories of data pursuant to Art. 9 (1) GDPR are processed.

If express consent to the transfer of personal data to third countries is provided, the data processing shall also take place on the basis of Art. 49 (1) lit. a GDPR.

If you have consented to the storage of cookies or to the access to information on your end device (e.g. via device fingerprinting), the data processing is also carried out on the basis of Section 25 (1) TTDSG. Consent can be revoked at any time.

If your data is required to carry out the contract or for the implementation of pre-contractual measures, we process your data on the basis of Art. 6 (1) lit. b GDPR. Furthermore, we process your data, insofar as this is necessary for the fulfilment of a legal obligation, on the basis of Art. 6 (1) lit. c GDPR.

Data processing may also be carried out on the basis of our legitimate interest pursuant to Art. 6 (1) lit. f GDPR.

The following sections of this data protection declaration provide information on the relevant legal bases in each individual case.

### **2.2 General notes on storage duration**

If no special storage duration has been specified within this data protection declaration, your personal data will remain with us until the purpose for data processing no longer applies.

If you make a legitimate request for erasure 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. retention periods under tax or commercial law). In this latter case, the data will be deleted after these reasons cease to apply.

<sup>1</sup> For the sake of readability, the masculine form is used throughout the text. Of course, all genders (m, f, d) are referred to and addressed by this.

### 2.3 General note on data transfer to the USA and other third countries

We sometimes use tools from companies based in the USA or other third countries (countries outside the EEA), which may not offer and take into account a comparable high level of protection in accordance with the GDPR provisions in the EU. If these tools are active, your personal data may be transferred to these third countries and processed there.

US companies are obliged to hand over personal data to security authorities without you as the data subject being able to take legal action against this. It cannot therefore be ruled out that US authorities (e.g. intelligence services) may process, evaluate and permanently store your data on US servers for monitoring purposes. We have no influence on these processing activities.

### 2.4 SSL or TLS encryption

This site uses SSL or TLS encryption for security reasons and to protect the transmission of confidential content, such as orders or enquiries that you send to us as the site operator.

You can recognise an encrypted connection by the fact that the address line of the browser changes from „http://“ to „https://“ and the padlock symbol appears in your browser bar.

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

## 3. Processing of personal data on this website

### 3.1 Hosting

This website is hosted by an external service provider (host). The personal data collected on this website is stored on the host's servers. This can primarily include IP addresses, contact requests, metadata and communication data, contract data, contact data, names, website access and other data generated via a website.

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

Where relevant consent has been requested, the processing takes place exclusively on the basis of Art. 6 (1) lit. a GDPR and Section 25(1) TTDSG, insofar as the consent includes the storage of cookies or access to information on the user's end device (e.g. device fingerprinting) in the sense of the TTDSG. Consent can be revoked at any time.

Our host will only process your data insofar as this is necessary to fulfil its service obligations and will follow our instructions with regard to this data.

### 3.2 Server log files

The provider of the pages automatically collects and stores information in server log files, which your browser automatically transmits to us. These are:

- Browser type and browser version
- Operating system used
- Referrer URL
- Host name of the accessing computer
- Time of server request
- IP address

This data is not merged with other data sources. This data is collected on the basis of Art. 6 (1) lit. f GDPR. The website operator has a legitimate interest in the technically error-free presentation and optimisation of its website – to enable this, the server log files must be recorded.

### 3.3 Cookies

Our websites use so-called „cookies“. Cookies are small text files and do not cause any damage to your end device. They are either temporarily stored on your end device for the duration of a session (session cookies) or permanently (permanent cookies).

Session cookies are automatically deleted at the end of your visit. Permanent cookies remain stored on your end device until you delete them yourself or until they are automatically deleted by your web browser.

In some cases, cookies from third-party companies may also be stored on your end device when you enter our site (third-party cookies). These enable us or you to use certain services of the third-party company (e.g. cookies for processing payment services).

Cookies have various functions. Many cookies are technically necessary because certain website functions would not work without them (e.g. the shopping cart function or playing videos). Other cookies are used to evaluate user behaviour or display advertising.

Cookies that are used to implement the electronic communication process for the provision of certain functions you require (e.g. for the shopping cart function) or to optimise the website (e.g. cookies for measuring the web audience) (necessary cookies) are based on Art. 6 (1) lit. f GDPR, unless another legal basis is specified. The website operator has a legitimate interest in the storage of necessary cookies to ensure technically error-free and optimised provision of his services.

If consent to the storage of cookies and similar recognition technologies has been requested, the processing takes place exclusively on the basis of this consent (Art. 6 (1) lit. a GDPR and Section 25(1) TTDSG); consent can be revoked at any time.

#### Consent with Usercentrics

This website uses Consent technology from Usercentrics to obtain your consent to the storage of certain cookies on your end device or to the use of certain technologies and to document these in compliance with data protection regulations. The provider of this technology is Usercentrics GmbH, Sendlinger Straße 7, 80331 Munich, website:

<https://usercentrics.com/de/> (hereinafter referred to as „Usercentrics“)

When you enter our website, the following personal data is transferred to Usercentrics:

- Your consent(s) or withdrawal of your consent(s)
- Your IP address
- Information about your browser
- Information about your end device
- Time of your visit to the website

Usercentrics also stores a cookie in your browser to be able to assign the granted consents or their revocation to you. The data collected in this way is saved until you ask us to delete it, delete the Usercentrics cookie yourself, or the purpose for storing the data no longer applies. Mandatory statutory retention obligations remain unaffected.

Usercentrics is used to obtain the legally required consents for the use of certain technologies. The legal basis for this is Art. 6 (1) lit. c GDPR.

### 3.4 Registration on this website

You can register on this website to use additional features on the site. We only use the data entered for this purpose for the use of the respective offer or service for which you have registered. The mandatory information requested during registration must be provided in full. Otherwise, the registration will be declined.

For important changes, such as in the scope of the offer or in the event of technically necessary changes, we use the e-mail address provided during registration to inform you of this.

The processing of the data entered during registration is carried out for the purpose of implementing the usage relationship established by the registration and, if applicable, to initiate further contracts (Art. 6 (1) lit. b GDPR).

The data collected during registration is stored by us for as long as you are registered on this website and will then be deleted. Statutory retention periods remain unaffected.

### 3.5 Contact form

If you send us enquiries via the contact form, your information from the enquiry form, including the contact details you provide there, will be stored by us for the purpose of processing the enquiry and in the event of follow-up questions. We will not pass on this data without your consent.

The processing of this data takes place in accordance with Art. 6 (1) lit. b GDPR, if your enquiry is related to the fulfilment of a contract or if it is necessary to carry out pre-contractual measures. In all other cases, the processing takes place based on our justified interest in the effective processing of enquiries sent to us (Art. 6 (1) lit. f GDPR) and / or based on your consent (Art. 6 (1) lit. a GDPR); the consent can be revoked at any time.

The data entered by you in the contact form remains with us until you ask us for its deletion, revoke your consent to storage or the purpose for the data storage no longer applies (e.g. after completion of your enquiry). This does not affect the following statutory provisions - in particular retention periods.

### 3.6 Request by e-mail, telephone or fax

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

The processing of this data takes place in accordance with Art. 6 (1) lit. b GDPR, if your enquiry is related to the fulfilment of a contract or if it is necessary to carry out pre-contractual measures. In all other cases, the processing is based on our legitimate interest in the efficient processing of the enquiries (Art. 6 (1) lit. f GDPR) sent to us or your consent (Art. 6 (1) lit. a GDPR), consent can be revoked at any time on request.

The data sent by you to us using the contact form remains with us until you ask us for its deletion, revoke your consent to storage or the purpose for the data storage is omitted (e.g. after completion of your enquiry). Mandatory statutory provisions - in particular statutory retention periods - remain unaffected.

### 3.7 Online Order System

Your personal data is transmitted, via SSL over the Internet in the order process (Online Order System). We secure our website and other systems by means of technical and organisational measures against loss, destruction, access, alteration or dissemination of your data by unauthorised persons. Access to your customer account is only possible after entering your personal password and security key. You should always keep your access information

confidential and close the browser window when you have finished communicating with us, especially if you share your computer with others.

### 3.8 Newsletter

If you would like to receive the newsletter offered on the website, we require an e-mail address from you as well as information that allows us to verify that you are the owner of the specified e-mail address and that you agree to receive the newsletter. Other data is not collected or only collected on a voluntary basis. We use newsletter service providers for processing newsletters, which are described below.

To send our newsletters, we use a service provider via which the sending of newsletters can be organised and analysed. The data you enter for the newsletter subscription (e.g. e-mail address) is stored on the servers of the service provider in Germany or Ireland.

Our newsletters enable us to analyse the behaviour of newsletter recipients. Among other things, it is possible to analyse how many recipients have opened the newsletter message and how often which link was clicked in the newsletter. Conversion tracking can also be used to analyse whether a predefined action (e.g. purchase of a product on this website) took place after clicking the link in the newsletter.

Data processing is based on your consent (Art. 6 (1) lit. a GDPR). You can withdraw this consent at any time by unsubscribing from the newsletter. The legality of the data processing operations already carried out remains unaffected by the revocation.

If no analysis by our service provider is desired, you must unsubscribe from the newsletter. We provide a corresponding link in every newsletter message for this purpose.

The data we save for the purpose of sending the newsletter will be stored by us until you unsubscribe from the newsletter with us or the newsletter service provider and will be deleted from the newsletter mailing list once the unsubscribe process is complete. Data stored by us for other purposes remains unaffected by this.

After you have unsubscribed from the newsletter mailing list, your e-mail address will be sent to us or the newsletter service provider saved in a blacklist if this is necessary to prevent future mailings. The data from the blacklist is only used for this purpose and is not combined with other data. This serves both your interest and our interest in complying with the legal requirements when sending newsletters (legitimate interest in the sense of Art. 6 (1) lit. f GDPR). Storage in the blacklist is not limited in time. You can object to the storage if your interests outweigh our legitimate interest.

## 4. Applicant details

The data required for the application process is submitted by the applicant (m/f/d) to a specific job advertisement or as an unsolicited application digitally, by post or in person. As part of the application process, it is mandatory that the following of your data is processed: Salutation, name, date of birth, e-mail address, user language, postal address and telephone numbers, educational degree, specialism, most recent educational institution, information on current employment, professional experience and CV. We also process data that is necessary for completing the application process (correspondence with the applicant, written records from the interviews, etc.). If you voluntarily provide us with additional information (e.g. information in attached documents), processing will be carried out in accordance with statutory regulations.



#### 4.1 Purpose and legal basis

The purpose of data processing is the selection of applicants for employment. There are no plans to change this purpose. Any deviations require the separate consent of the applicant.

The information is collected by us, stored and passed on where necessary, in order to process an application based on the specific purpose. The data is also collected, stored and passed on for the purposes of pre-contractual measures at the request of the person in question. The legal basis is § 26 (1) BDSG, Art. 6 (1) lit. b (initiation of the employment contract) and Art. 88 GDPR. Information provided voluntarily as part of an application process is processed based on § 26 (2) BDSG, Art. 6 (1) lit. a) (consent) and Art. 88 GDPR.

When an employment contract is signed, the documents are added to the personnel file. This file is stored securely by the human resources department.

Personal data is only passed on within the company to persons or departments involved in the application process. Data is only passed on to third parties if and to the extent that there is a specific legal basis for this and/or in cases where a government investigating authority requests data on the basis of these legal provisions.

Further processing shall only take place if the applicant has specifically consented to this processing in terms of type and scope within the meaning of Art. 6 (1) lit. a GDPR.

The information is never passed on to third countries. In all other respects, reference is made to Section 2.3. of this data protection declaration.

We take systematised technical and organisational measures to ensure the protection of personal data. These measures are always adapted to the current state of the art.

#### 4.2 Storage period

Generally applicant data is deleted 6 months after completion of the application process. The provisions of the General Equal Treatment Act (AGG) form the basis for the 6-month retention period. If we are unable to offer you a suitable position at the time of your application, we may, after completion of the application process, offer to include your data in the Winkhaus applicant pool. The Winkhaus applicant pool is used to maintain contact with you for professional purposes and to consider you for future job vacancies. Processing of your data for this purpose will only take place if you explicitly consent to this on receipt of a separate e-mail. Withdrawal of this consent with effect for the future is possible at any time – even without stating reasons. If you have received travel expense reimbursements from the Winkhaus Group as part of the application process, the applicant data collected as part of travel expense reimbursements (in particular name, address, bank details, amount) will be stored for a maximum of 10 years to the end of a calendar year in which the claim arose.

Once these terms have elapsed, the data collected is deleted, or blocked if it is not possible to delete the information in the individual case.

## 5. Analysis tools and advertising

### 5.1 Google Analytics

#### 5.1.1 Overview

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

Google Analytics enables the website operator to analyse the behaviour of visitors to the website. 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 assigned to the respective end device of the user. There is no assignment to a device ID. Furthermore, we can use Google Analytics, among other things, to record your mouse and scroll movements and clicks. Furthermore, Google Analytics uses various modelling approaches to supplement the collected data sets and uses machine learning technologies for data analysis.

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

The use of this analysis tool is based on Art. 6 (1) lit. f GDPR. The website operator has a legitimate interest in analysing user behaviour to optimise both its website and advertising. Where relevant consent has been requested, the processing takes place exclusively on the basis of Art. 6 (1) lit. a GDPR and Section 25(1) TTDSG, insofar as the consent includes the storage of cookies or access to information on the user's end device (e.g. device fingerprinting) in the sense of the TTDSG. Consent can be revoked at any time.

Data transfer to the USA is based on the standard contractual clauses of the EU Commission. In all other respects, Section 2.3 of this data protection declaration applies.

Details can be found here: <https://privacy.google.com/businesses/controllerterms/mccs/>

#### 5.1.2 IP anonymisation

We have enabled the IP anonymisation feature on this website. As a result, your IP address will be abbreviated by Google within member states of the European Union or in other member states of the European Economic Area, before being transferred to the USA. Only in exceptional cases will the full IP address be transferred to a Google server in the USA and abbreviated there. On behalf of the operator of this website, Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity, and providing other services relating to website activity and internet usage towards the website operator. The IP address transmitted by your browser as part of Google Analytics will not be combined with other Google data.

#### 5.1.3 Browser plugin

You can prevent the collection and processing of your data by Google by downloading and installing the browser plug-in available under the following link:

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

However, we would like to point out that, in this case, you may not be able to make full use of all the functions of this website.

More information on how Google Analytics handles user data can be found in Google's privacy statement:

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

#### 5.1.4 Demographic features in Google Analytics

This website uses the ‚demographic features‘ function of Google Analytics in order to be able to display suitable advertisements to website visitors within the Google advertising network. This makes it possible to create reports with information on age, gender and interests of the site visitors. This data originates from interest-related advertising from Google, as well as from visitor data from third-party providers. This data cannot be assigned to a specific person.

You can deactivate this function at any time via the ad settings in your Google account or generally prohibit the collection of your data by Google Analytics as described under „Objection to data collection“.

### 5.2 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 allows us to display advertisements in the Google search engine or on third-party websites if the user enters specific search terms in 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 website operators, we can evaluate this data quantitatively by analysing, for example, which search terms led to the display of our advertisements and how many advertisements resulted in corresponding clicks.

Google Ads are used on the basis of Art. 6 (1) lit. f GDPR. The website operator has a legitimate interest in marketing its products as effectively as possible.

Data transfer to the USA is based on the standard contractual clauses of the EU Commission. In all other respects, Section 2.3 of this data protection declaration applies.

Details can be found here:

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

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

### 5.3 Google Remarketing

#### 5.3.1 Overview

This website uses the functions of Google Analytics Remarketing. The provider is Google Ireland Limited („Google“), Gordon House, Barrow Street, Dublin 4, Ireland.

Google Remarketing analyses your user behaviour on our website (e.g. clicking on certain products) in order to classify you in certain advertising target groups and then display suitable advertising messages to you when you visit other online content (remarketing or retargeting).

The advertising target groups created with Google Remarketing can also be linked to the cross-device functions of Google. In this way, interest-based, personalised advertising, which has been adapted to you based on your previous usage and surfing behaviour on an end device (e.g. mobile phone), can also be shown on another of your end devices (e.g. tablet or PC).

If you have a Google account, you can object to personalised advertising under the following link:

<https://www.google.com/settings/ads/onweb/>

Google Remarketing is used on the basis of Art. 6 (1) lit. f GDPR. The website operator has a legitimate interest in marketing its products as effectively as possible. Where relevant consent has been requested, the processing takes place exclusively on the basis of Art. 6 (1) lit. a GDPR and Section 25(1) TTDSG, insofar as the consent includes the storage of cookies or access to information on the user's end device (e.g. device fingerprinting) in the sense of the TTDSG. Consent can be revoked at any time.

Further information and the data protection provisions can be found in Google's privacy policy at: <https://policies.google.com/technologies/ads?hl=de>

### 5.3.2 Target group formation with customer comparison

For target group formation, we use the customer comparison feature of Google Remarketing, among other things. In doing so, we pass on certain customer data (e.g. e-mail addresses) from our customer lists to Google. If the customers concerned are Google users and logged into their Google account, suitable advertising is displayed within the Google network (e.g. on YouTube, Gmail or in the search engine).

### 5.4 Google Conversion Tracking

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

Both we and Google can use Google Conversion Tracking to recognise whether the user has carried out specific actions. For example, we can evaluate which buttons on our website have been clicked on and how often, and which products have been viewed or purchased particularly frequently. This information is used to generate conversion statistics. We find out the total number of users who clicked on our ads and what actions they took. We do not receive any information that would enable us to identify the user. Google itself uses cookies or comparable recognition technologies for identification purposes.

Google conversion tracking is used on the basis of Art. 6 (1) lit. f GDPR. The website operator has a legitimate interest in analysing user behaviour to optimise both its website and advertising. Where relevant consent has been requested, the processing takes place exclusively on the basis of Art. 6 (1) lit. a GDPR and Section 25(1) TTDSG, insofar as the consent includes the storage of cookies or access to information on the user's end device (e.g. device fingerprinting) in the sense of the TTDSG. Consent can be revoked at any time.

More information on Google Conversion Tracking can be found in Google's privacy policy: <https://policies.google.com/privacy?hl=de>

### 5.5 Google DoubleClick

This website uses features of Google DoubleClick. The provider is Google Ireland Limited („Google“), Gordon House, Barrow Street, Dublin 4, Ireland, (hereinafter "DoubleClick").

DoubleClick is used to show you interest-based advertisements throughout the Google advertising network. With the help of DoubleClick, the advertisements can be specifically adapted to the interests of the respective viewer. For example, our advertising can be displayed in Google search results or in advertising banners that are connected with DoubleClick. In order to be able to display users interest-based advertising, DoubleClick must recognise the respective viewer and be able to assign their visited websites, clicks and other information to the user behaviour. For this purpose, DoubleClick uses cookies or comparable recognition technologies (e.g. device fingerprinting). The information collected is combined into a pseudonymous user profile in order to display interest-based advertising to the user concerned.

Google DoubleClick is used in the interest of targeted advertising measures. This constitutes a legitimate interest within the meaning of Art. 6 (1) lit. f GDPR. Where relevant consent has been requested, the processing takes place exclusively on the basis of Art. 6 (1) lit. a GDPR and Section 25(1) TTDSG, insofar as the consent includes the storage of cookies or access to information on the user's end device (e.g. device fingerprinting) in the sense of the TTDSG. Consent can be revoked at any time.

Further information on the options for objecting to the advertisements displayed by Google can be found under the following links:

<https://policies.google.com/technologies/ads> and

<https://adssettings.google.com/authenticated>

### 5.6 Facebook Pixel

This website uses Facebook's visitor action pixels to measure conversion. The provider of this service is Meta Platforms Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland. According to Facebook, however, the data collected is also transferred to the USA and other third countries.

This means that the behaviour of the website visitors can be tracked after they have been forwarded to the provider's website by clicking on a Facebook advertisement.

This allows the effectiveness of Facebook advertisements to be evaluated for statistical and market research purposes and future advertising measures to be optimised. The data collected is anonymous to us as the operator of this website; we cannot draw any conclusions about the identity of the users. However, the data is stored and processed by Facebook so that a connection to the respective user profile is possible and Facebook processes the data for its own advertising purposes in accordance with the Facebook data usage policy. This enables Facebook to display advertising on Facebook pages as well as outside Facebook. This use of the data cannot be influenced by us as the website operator.

Facebook pixels are used on the basis of Art. 6 (1) lit. f GDPR. The website operator has a legitimate interest in effective advertising measures, including social media. Where relevant consent has been requested, the processing takes place exclusively on the basis of Art. 6 (1) lit. a GDPR and Section 25(1) TTDSG, insofar as the consent includes the storage of cookies or access to information on the user's end device (e.g. device fingerprinting) in the sense of the TTDSG. Consent can be revoked at any time.

Data transfer to the USA is based on the standard contractual clauses of the EU Commission. In all other respects, Section 2.3 of this data protection declaration applies.

Details can be found here:

[https://www.facebook.com/legal/EU\\_data\\_transfer\\_addendum](https://www.facebook.com/legal/EU_data_transfer_addendum) and

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

Insofar as personal data is collected on our website and forwarded to Facebook using the tool described here, we and Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland are jointly responsible for this data processing (Art. 26 GDPR). The joint responsibility is limited exclusively to the collection of data and its transfer to Facebook. Processing by Facebook after forwarding is not part of the joint responsibility. The obligations incumbent upon us jointly have been set out in an agreement on joint processing. The wording of the agreement can be found at:  
[https://www.facebook.com/legal/controller\\_addendum](https://www.facebook.com/legal/controller_addendum)

In accordance with this agreement, we are responsible for providing data protection information when using the Facebook tool and for the data protection-compliant implementation of the tool on our website.

Facebook is responsible for the data security of Facebook products. Data subject rights (e.g. requests for information) regarding the data processed by Facebook can be asserted directly with Facebook. If you assert the data subject rights with us, we are obliged to forward them to Facebook.

You can find further information on protecting your privacy in Facebook's privacy policy: <https://de-de.facebook.com/about/privacy/>

You can also disable the „Custom Audiences“ remarketing function in the advertising settings area at [https://www.facebook.com/ads/preferences/?entry\\_product=ad\\_settings\\_screen](https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen). To do this, you must be logged in to Facebook.

If you do not have a Facebook account, you can deactivate Facebook usage-based advertising on the website of the European Interactive Digital Advertising Alliance: <http://www.youronlinechoices.com/de/prferenzmanagement/>

## 5.7 LinkedIn Insight Tag

### 5.7.1 Overview

This website uses the LinkedIn Insight Tag. The provider of this service is LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland.

The LinkedIn Insight Tag provides us with information about visitors to our website. If a website visitor is registered on LinkedIn, we can, among other things, analyse the key professional data (e.g. career level, company size, country, location, industry and job description) of our website visitors and thus better target our website to the respective target groups.

We can also use LinkedIn Insight Tags to measure whether visitors to our websites make a purchase or take another action (conversion measurement). The conversion measurement can also be carried out across devices (e.g. from PC to tablet). LinkedIn Insight Tag also offers a retargeting function, which we can use to display targeted advertising outside the website to the users of our website, whereby, according to LinkedIn, no identification of the advertising addressee takes place.

The use of LinkedIn Insight is based on Art. 6 (1) lit. f GDPR. The website operator has a legitimate interest in effective advertising measures, including social media. Where relevant consent has been requested, the processing takes place exclusively on the basis of Art. 6 (1) lit. a GDPR and Section 25(1) TTDSG, insofar as the consent includes the storage of cookies or access to information on the user's end device (e.g. device fingerprinting) in the sense of the TTDSG. Consent can be revoked at any time.

Data transfer to the USA is based on the standard contractual clauses of the EU Commission. In all other respects, Section 2.3 of this data protection declaration applies.

Details can be found here:

<https://www.linkedin.com/legal/l/dpa> and

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

LinkedIn itself also collects so-called log files (URL, referrer URL, IP address, device and browser properties and time of access). The IP addresses are shortened or hashed (pseudonymized) (if they are used to reach LinkedIn members across devices). The direct iden-

tifiers of LinkedIn members will be deleted from LinkedIn after seven days. The remaining pseudonymized data will then be deleted within 180 days.

As the website operator, we cannot assign the data collected by LinkedIn to specific individuals. LinkedIn will store the collected personal data of website visitors on its servers in the USA and use it as part of its own advertising measures. Details can be found in LinkedIn's privacy statement at

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

#### 5.7.2 Objection to the use of LinkedIn Insight Tag

You can object to the analysis of user behaviour and targeted advertising by LinkedIn under the following link:

<https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>

LinkedIn members can also control the use of their personal data for advertising purposes in the account settings. To prevent LinkedIn from linking data collected on our website to your LinkedIn account, you must log out of your LinkedIn account before visiting our website.

## 6. Plugins and tools

### 6.1 YouTube

Videos from the YouTube website are integrated in this website. The website is operated by Google Ireland Limited („Google“), Gordon House, Barrow Street, Dublin 4, Ireland.

If you visit one of our 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.

YouTube can also store various cookies on your end device or use similar technologies for recognition (e.g. device fingerprinting). In this way, YouTube can receive information about visitors to this website. This information is used, among other things, to collect video statistics, improve user friendliness and prevent fraud attempts.

If you are logged into your YouTube account, you enable YouTube to assign your surfing behaviour directly to your personal profile. You can prevent this by logging out of your YouTube account.

YouTube is used in the interest of presenting our online services in an appealing manner. This constitutes a legitimate interest within the meaning of Art. 6 (1) lit. f GDPR. Where relevant consent has been requested, the processing takes place exclusively on the basis of Art. 6 (1) lit. a GDPR and Section 25(1) TTDSG, insofar as the consent includes the storage of cookies or access to information on the user's end device (e.g. device fingerprinting) in the sense of the TTDSG. Consent can be revoked at any time.

Further information on how user data is handled can be found in YouTube's privacy policy at: <https://policies.google.com/privacy?hl=de>

### 6.2 Google Tag Manager

We use Google Tag Manager. The provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

Google Tag Manager is a tool that allows us to integrate tracking or statistics tools and other technologies into our website. Google Tag Manager itself does not create any user profiles, stores no cookies and does not perform any independent analyses. It is only used for the management and provision of the tools connected via it. However, Google Tag Manager collects your IP address, which can also be transmitted to the parent company of Google in the United States.

Google Tag Manager is used on the basis of Art. 6 (1) lit. f GDPR. The website operator has a legitimate interest in the quick and uncomplicated integration and management of various tools on its website. Where relevant consent has been requested, the processing takes place exclusively on the basis of Art. 6 (1) lit. a GDPR and Section 25(1) TTDSG, insofar as the consent includes the storage of cookies or access to information on the user's end device (e.g. device fingerprinting) in the sense of the TTDSG. Consent can be revoked at any time.

### 6.3 Google Web Fonts (local hosting)

This page uses so-called web fonts, which are provided by Google, for the uniform display of fonts. The Google fonts are installed locally. No connection to Google servers takes place.

Further information on Google Web Fonts can be found at

<https://developers.google.com/fonts/faq>

and in Google's privacy statement:

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

### 6.4 Google Maps

This page uses the Google Maps service. The provider is Google Ireland Limited („Google“), Gordon House, Barrow Street, Dublin 4, Ireland.

To use the functions of Google Maps, it is necessary to save your IP address. This information is usually transferred to a Google server in the USA and stored there. The provider of this site has no influence on this data transfer. If Google Maps is activated, Google can use Google Web Fonts to ensure a uniform display of the fonts.

When you call up Google Maps, your browser loads the required web fonts into your browser cache in order to display texts and fonts correctly.

The use of Google Maps is in the interest of an appealing presentation of our online services and in an easy navigation to the places indicated by us on the website. This constitutes a legitimate interest within the meaning of Art. 6 (1) lit. f GDPR. Where relevant consent has been requested, the processing takes place exclusively on the basis of Art. 6 (1) lit. a GDPR and Section 25(1) TTDSG, insofar as the consent includes the storage of cookies or access to information on the user's end device (e.g. device fingerprinting) in the sense of the TTDSG. Consent can be revoked at any time.

Data transfer to the USA is based on the standard contractual clauses of the EU Commission. In all other respects, Section 2.3 of this data protection declaration applies.

Details can be found here:

<https://privacy.google.com/businesses/gdprcontrollerterms/> and

<https://privacy.google.com/businesses/gdprcontrollerterms/scs/>

More information on how user data is handled can be found in Google's privacy statement:

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

### 6.5 Google reCAPTCHA

We use „Google reCAPTCHA“ (hereinafter „reCAPTCHA“) on this website. The provider is Google Ireland Limited („Google“), Gordon House, Barrow Street, Dublin 4, Ireland.

reCAPTCHA is designed to check whether the data input on this website (e.g. in a contact form) is entered by a person or by an automated program. For this purpose, reCAPTCHA analyses the behaviour of the website visitor based on various characteristics. This analysis starts automatically as soon as the website visitor enters the website. For the analysis, reCAPTCHA evaluates various information (e.g. IP address, length of time the visitor stays on



the website or mouse movements made by the user). The data collected during the analysis is forwarded to Google.

The reCAPTCHA analyses are done completely in the background. Website visitors are not informed that an analysis is taking place.

The storage and analysis of the data is based on Art. 6 (1) lit. f GDPR. The website operator has a legitimate interest in protecting its advertising offers against improper automated spying and against SPAM. Where relevant consent has been requested, the processing takes place exclusively on the basis of Art. 6 (1) lit. a GDPR and Section 25(1) TTDSG, insofar as the consent includes the storage of cookies or access to information on the user's end device (e.g. device fingerprinting) in the sense of the TTDSG. Consent can be revoked at any time.

Further information on Google reCAPTCHA can be found in the Google privacy policy and the Google terms of use under the following links:

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

<https://policies.google.com/terms?hl=de>

### **6.6 Matterport**

On our websites, we use services of Matterport Inc., 352 E. Java Dr. Sunnyvale, CA 94089, USA. If you visit one of our pages equipped with a Matterport 3D tour, a connection will be established to Matterport's servers. Your IP address, browser version and displaying device, origin and destination URL and the ID of the respective 3D tour are transmitted to the Matterport servers in the USA. Matterport is subject to the conditions of the „EU - U.S. Privacy Shield Frameworks“. Data transfer to the USA is based on the standard contractual clauses of the EU Commission. In all other respects, Section 2.3 of this data protection declaration applies.

Matterport is used in the interest of presenting our online services in an appealing manner. This constitutes a legitimate interest within the meaning of Art. 6 (1) lit. f GDPR. Further information on the handling of user data can be found in Matterport's privacy policy at:

<https://matterport.com/legal/privacy-policy/>

### **6.7 Font Awesome (local hosting)**

This page uses Font Awesome for uniform display of fonts. Font Awesome is installed locally. No connection to Fonticons, Inc. servers takes place.

For more information on Font Awesome, please refer to the Font Awesome privacy statement at:

<https://fontawesome.com/privacy>

### **6.8 Hoefler & Co. Webfonts**

We use external web fonts from Hoefler & Co., 611 Broadway, Room 725, New York, NY 10012- 2608, USA, for optimised display on our websites.

For technical reasons, your browser establishes a direct connection with the Hoefler & Co. servers in each session, where your IP address can be read, among other things. To improve performance, a temporary session cookie is stored in your browser.

The use of Hoefler & Co. Web Fonts takes place in the interest of an attractive presentation of our online service. This constitutes a legitimate interest within the meaning of Art. 6 (1) lit. f GDPR. If your browser does not support Web Fonts, your computer will use a default font instead.

We have no influence on the scope of data collected by Hoefler & Co. in this way.

Hoefler & Co.'s privacy statement (in English) can be found here: <http://www.typography.com/home/privacy.php>

### **6.9 Data tables**

A CDN service for tables and charts is used on our website. In this context, your browser may transfer personal data to our service provider. The legal basis for the data processing is Art. 6 (1) lit. f GDPR. The legitimate interest lies in ensuring the functionality of our website. The data is deleted as soon as the purpose for which it was collected has been fulfilled.

## **7. eCommerce and payment providers (Partner Portal and spare parts shop)**

### **7.1 Customers and contract data**

We collect, process and use personal data only to the extent that it is necessary for the establishment, content determination or amendment of the legal relationship (existing data).

This is based on Art. 6 (1) lit. b GDPR, which permits the processing of data for the performance of a contract or pre-contractual measures. We only collect, process and use personal data on the use of this website (usage data) to the extent that this is necessary to enable the user to make use of or pay for the service.

The customer data collected will be deleted after the order has been completed or the business relationship has ended. Statutory storage obligations remain unaffected by this.

### **7.2 Data transfer upon conclusion of contract for online shops, dealers and shipping of goods**

When you order goods from us, we pass on your personal data to the transport company entrusted with the delivery and to the payment service provider commissioned with the payment processing. Only data that the respective service provider needs to fulfil its task is provided.

The legal basis for this is Art. 6 (1) lit. b GDPR, which permits the processing of data for the performance of a contract or pre-contractual measures. Where you have given relevant consent in accordance with Art. 6 (1) lit. a GDPR, we will hand over your e-mail address to the transport company entrusted with the delivery so that the company can inform you by e-mail about the shipping status of your order; you can revoke your consent at any time.

### **7.3 Data transfer upon conclusion of contract for services and digital content**

We only transfer personal data to third parties if this is necessary to carry out the contract, for example to the bank commissioned with payment processing.

The data will not be transferred further or will only be transferred if you have expressly consented to the transfer. Your data will not be passed on to third parties without express consent, for example for advertising purposes.

The basis for data processing is Art. 6 (1) lit. b GDPR, which permits the processing of data for the performance of a contract or pre-contractual measures.

## 7.4 Credit checks

In the case of a purchase on account or other payment method for which we make advance payment, we can carry out a credit check procedure (scoring). For this purpose, we transfer the data you have entered (e.g. name, address, age or bank details) to a credit agency. Based on this data, the probability of a payment default is determined. If there is an excessive risk of payment default, we can refuse the payment type in question.

For this purpose, we work with a service provider from whom we receive the necessary data. As part of this process, we send your name and contact details to the service provider.

The credit check is carried out on the basis of contractual fulfilment (Art. 6 (1) lit. b GDPR) and to avoid payment defaults (legitimate interest pursuant to Art. 6 (1) lit. f GDPR). If consent has been obtained, the credit check is carried out on the basis of this consent (Art. 6 (1) lit. GDPR); consent can be revoked at any time.

## 8. Audio and video conferencing

### 8.1 General instructions

#### 8.1.1 Data processing

We use online conference tools, among other things, to communicate with our customers and applicants. The specific tools we use are listed below. If you communicate with us by video or audio conference via the Internet, your personal data will be collected and processed by us and the provider of the respective conference tool.

The conference tools collect all data that you provide/use to use the tools (e-mail address and/or your telephone 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 „contextual information“ in connection with the communication process (metadata).

The provider of the tool also processes all technical data required to carry out 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. If content is exchanged, uploaded or otherwise provided within the tool, it is also stored on the servers of the tool providers. Such content includes, but is not limited to, cloud recordings, chat/instant messages, voicemails, uploaded photos and videos, files, whiteboards and other information shared during use of the service. Please note that we do not have full influence over the data processing operations of the tools used. Our options are largely based on the corporate policy of the respective provider. Further information on data processing by the conference tools can be found in the privacy policies of the tools used, which we have listed under this text.

#### 8.1.2 Purpose and legal basis

The conference tools are used to communicate with prospective or existing contract partners and applicants and/or to offer certain services to our customers (Art. 6 (1) lit. b GDPR). Furthermore, the use of the tools serves to generally simplify and speed up communication with us or our company (legitimate interest within the meaning of Art. 6 (1) lit. f GDPR). If consent has been requested, the use of the relevant tools is based on this consent; consent can be revoked at any time with effect for the future.

#### 8.1.3 Storage period

The data collected directly by us via the video and conference tools will be deleted by our systems as soon as you ask us to delete it, revoke your consent to the storage, or the purpose for the data storage no longer applies. Stored cookies remain on your end device until you delete them. Mandatory statutory retention periods remain unaffected. We have no

influence on the storage period of your data, which is stored by the operators of the conference tools for their own purposes. For details, please contact the operators of the conference tools directly.

## 8.2 Tools used

### 8.2.1 Teamviewer

We use TeamViewer. The provider is TeamViewer Germany GmbH, Jahnstr. 30, 73037 Göppingen, Germany Details on data processing can be found in TeamViewer's privacy statement: <https://www.teamviewer.com/de/datenschutzerklaerung/>

### 8.2.2 Microsoft Teams

We use Microsoft Teams. The provider is Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA. Details on data processing can be found in the Microsoft Teams privacy statement:

<https://privacy.microsoft.com/de-de/privacystatement>

## 9. Your rights

### 9.1 Right to information

You have the right to obtain information from us (Art. 15 GDPR) on the processing of your personal data.

### 9.2 Right to rectification

You have the right to request that we correct (Art. 16 GDPR) incorrect or incomplete personal data relating to you.

### 9.3 Right to erasure

If the conditions specified in Art. 17 GDPR apply, you have the right to request the erasure of your data. You can then, for example, request the deletion of your data, insofar as it is no longer necessary for the purposes for which it was collected. You can also request erasure if your data was processed on the basis of your consent and you withdraw this consent.

### 9.4 Right to restriction of processing

You have the right to request the restriction of the processing of your personal data.

Please do not hesitate to contact us. The right to restrict processing exists in the following cases:

- if you deny the accuracy of your personal information stored with us, we usually need time to verify this. For the duration of the verification, you have the right to request the restriction of the processing of your personal data.
- If the processing of your personal data is unlawful, you may request the restriction of data processing instead of its deletion.
- If we no longer need your personal data, but you need it in order to exercise, defend or enforce legal claims, you have the right to demand that your personal data be restricted instead of being deleted.
- If you file an objection in accordance with Art. 21 (1) GDPR, a balance must be established between your interests and our own. As long as it is not clear whose interests prevail, you have the right to demand the restriction of the processing of your personal data.
- If you have restricted the processing of your personal data, this data may only be used with your consent - except for its storage - for the purposes of the assertion, exercise or defence of legal claims or to protect the rights of another natural or legal person or for reasons of important public interest of the European Union or a Member State.

### 9.5 Right to data portability

With regard to data that we process in an automated way on the basis of your consent or in the context of contractual fulfilment, you have the right to have said data transferred to yourself or a third party in a standard, machine-readable format. If you require the direct transfer of data to another responsible person, this will only be done to the extent that it is technically feasible.

### 9.6 Right to object

If the data processing takes place on the basis of Article 6 (1) lit. e or f GDPR, you have the right to object to the processing of your personal data at any time for reasons arising from your particular situation; this also applies to profiling based on these provisions. The relevant legal basis on which processing is based can be found in this data protection declaration.

If you file an objection, we will no longer process the relevant personal information, unless we can verify strong, legitimate reasons for the processing, which outweigh your interests, rights and freedoms, or where the data processing is necessary to assert, exercise or defend legal claims (right to object in accordance with Art. 21 (1) GDPR).

If your personal information is processed for the purposes of direct advertising, you have the right to object to the processing of the relevant personal information relating to you for the purposes of this form of advertising at any time; this also applies for profiling, where it is connected with advertising of this kind.

If you object, your personal data will no longer be used for the purposes of direct advertising. (Objection according to Art. 21(2) GDPR)

### 9.7 Right of withdrawal

Many data processing operations are only possible with your explicit consent. You can withdraw your consent at any time. The legality of the data processing carried out until the point of revocation remains unaffected by the revocation.

### 9.8 Right to lodge a complaint

In the case of GDPR violations, the persons concerned have a right of appeal to a supervisory authority. For example, you can contact:

State Commissioner for Data Protection and Freedom of Information North Rhine-Westphalia  
PO Box 20 04 44  
40102 Düsseldorf

## 10. Contact partner

Our Data Protection Officer is available as a contact person for any data protection-related concerns:

Data Protection Officer at Aug. Winkhaus GmbH & Co. KG | August-Winkhaus-Str. 31  
48291 Telgte, Germany | E-mail: [datenschutz@winkhaus.de](mailto:datenschutz@winkhaus.de)