

Data Privacy Statement

I. Name and Address of the Controller

The Controller as defined in the General Data Protection Regulation and other national data protection laws of the Member States and other data protection provisions is:

Compass-Verlag GmbH

Matznergasse 17

1140 Vienna

Austria

Phone: +43 / 1 / 981 16-0

Email: office[at]compass.at

Website: www.compass.at

II. Name and Address of the Data Protection Officer

The Controller's Data Protection Officer is:

Dr. Georg Hittmair

Matznergasse 17

1140 Vienna

Austria

Email: datenschutzbeauftragte[at]compass.at

III. General Information on Data Processing

1. Scope of the Processing of Personal Data

As a matter of principle we collect and use our users' personal data only to the extent that this is necessary to provide an operable website and our contents and services. Our users' personal data is principally collected and used only upon the user's consent. A derogation applies to

cases where prior obtaining of consent is not possible for factual reasons and the processing of the data is permitted by statutory provisions.

2. Legal Basis for the Processing of Personal Data

To the extent that we obtain the data subject's consent to processing activities Art. 6 (1) (a) of the General Data Protection Regulation (GDPR) is the legal basis.

For the processing of personal data which is necessary to perform a contract to which the data subject is a party Art. 6 (1) (b) GDPR is the legal basis. This also applies to processing activities which are necessary to implement pre-contractual measures.

To the extent that processing of personal data is necessary to fulfil a legal obligation to which our company is subject Art. 6 (1) (c) GDPR is the legal basis.

In the case that processing of personal data is necessary in order to protect vital interests of the data subject or of another natural person Art. 6 (1) (d) GDPR is the legal basis.

Art. 6 (1) (f) GDPR is the legal basis for data processing where processing is necessary for safeguarding our legitimate interests or those of a third party and where the interests, fundamental rights or fundamental freedoms of the data subject do not prevail over such interests.

3. Erasure of Data; Storage Period

The data subject's personal data will be erased or access to such data will be blocked if and when it is no longer needed in relation to the storage purpose. Storage beyond that period may occur if provided for by the European or national legislator in EU Regulations, statutes or other provisions to which the Controller is subject. The data will also be blocked or erased if and when a storage period prescribed by the said legislation expires, unless continued storage of the data is required for conclusion or performance of a contract.

IV. Collection of Data for Compass Products (Information as defined in Art. 14 GDPR)

1. Scope of the Processing of Personal Data

Compass-Verlag GmbH has been working as a directory publishing company for 150 years. It publishes data of Austrian business enterprises in its business databases and in addition to the Business Register also uses other registers and editorial research as a source. In the interest of our customers we aim to ensure completeness and accuracy. (Link to a description of our business: <https://compass.at/de/ueber-compass>) When processing data of natural persons our activities are subject to the General Data Protection Regulation and the Austrian Data Protection Act [*DSG*].

Our core business is

- to collect and structure
- data that is publicly available or has been researched by us
- regarding Austrian business entities
- from different sources
- and to import it into our own databases and
- to pass it on as a convenient information product in different technical formats

subject to a fee. Our customers may use such information to continuously monitor their own customer relations and to combat fraud.

2. Legal Basis for the Processing of Personal Data

The activities of Compass-Verlag GmbH are primarily governed by Art. 6 (1) (f) GDPR; processing is required to safeguard the Controller's or a third party's legitimate interest. We may refer to Recital 47, which defines the prevention of fraud as a legitimate interest and states that the processing of personal data for the purpose of direct marketing can be regarded as processing serving a legitimate interest.

Where data subjects provide us with data we are pleased to receive their consent in accordance with Art. (6) (1) (A) GDPR. We are aware that any passing on of data of third parties (employees of the relevant company) must be regulated internally first; we assume, however, that such internal clarification has taken place.

3. Purpose of Data Processing

Compass-Verlag GmbH possesses several trade licences to provide its services:

- directory publishing company and direct marketing company as defined in Section 151 of the Austrian Trade Code [*Gewerbeordnung/GewO*]
- credit agency as defined in Section 152 *GewO*
- book publishing house as defined in Section 103 (1) (b) No. 7 *GewO* 1973
- bookseller as defined in Section 103 (1) (b) No. 6 *GewO* 1973, limited to the sale of the publisher's own reference books / directories and the purchase and sale of reference books / directories and address books and academic works on economics and businesses of other publishers
- services in automated data processing and information technology
- advertising agency as defined in Section 103 (1) (b) No. 55 *GewO* 1973, limited to reference books / directories, address books and academic works on economics

The purpose of data processing as defined in Art. 5 (1) (b) GDPR is thus to support the provision of services which are expressly permitted by law according to the Trade Code.

4. Source of Personal Data

The sources of personal data used by Compass-Verlag GmbH include but are not limited to: the Austrian Business Register [*FB*], the Austrian Trade Register [*Gewerberegister*], the Austrian Trademark Register [*Markenregister*], the Austrian Patent Register [*Patentregister*], supplementary registers of other data subjects, the Austrian Medical Chamber [*Ärztchamber*], telephone directories of information agencies, the Austrian Register of Associations

[*Vereinsregister*], the Austrian Chamber of Notaries [*Notariatskammer*], dentists, veterinarians, the Austrian Federal Ministry of Health [*Bundesministerium für Gesundheit*], Chamber of Public Accountants and Tax Advisors [*Kammer der Wirtschaftstrehänder*], Austrian Federal Economic Chamber [*Wirtschaftskammer Österreich*], Financial Market Authority [*Finanzmarktaufsicht*].

5. Categories of Personal Data

All data categories from the underlying public registers will be stored.

The following data may be contained: internet ID, name, title, sex, date of birth, contact details, official ID (e.g. ZVR [Central Register of Associations] number).

6. Categories of Recipients

The recipients of the data are users of Compass services.

7. Storage Period

We store data permanently because also historical data is of great value to us and our customers. For example, Compass books from the interwar period were used as a key source for handling restitution issues. We have digitalised all data gathered in 150 years of publishing and offer this historical data in a separate product.

8. Possibility of Objection and Removal

Article 14 GDPR provides for duties to provide information in cases where personal data was not gathered from the data subject; however, paragraph 5 of that Article provides for exceptions from these duties to provide information. Two of these exceptions also apply to us:

Paragraphs 1 to 4 (= obligation to provide information) do not apply where and insofar as (b) provision of such information proves impossible or would involve a disproportionate effort

(c) obtaining or disclosure is expressly laid down by Union or Member State law to which the Controller is subject and which provides appropriate measures to protect the data subject's legitimate interests.

Almost all data of Compass products originate from freely accessible public databases. Further use of such data is regulated in the European PSI Directive and the Austrian Statute on Further Use of Information [*Informationsweiterwendungsgesetz*]. This legislation includes a reference to the data privacy provisions and is thus subject to paragraph (c). Moreover, informing millions of data subjects would require a disproportionate effort. Thus, we make such information available to the public, as provided for in the last sentence of Article 14 (5) (b) GDPR.

V. Provision of the Website and Creation of Log Files

1. Nature and Scope of Data Processing

Every time our website is retrieved our system will automatically collect data and information from the computer system of the retrieving computer.

In this connection the following data will be collected:

- (1) information on the browser type and the version used
- (2) the user's operating system
- (3) the user's IP address
- (4) date and time of access
- (5) websites from which the user's system is redirected to our website
- (6) websites retrieved by the user's system via our website
- (7) the user's request

Such data will also be stored in the log files of our system. Such data will not be stored together with other personal data of the user.

2. Legal Basis for Data Processing

The legal basis for temporary storage of data and log files is Art. 6 (1) (f) GDPR.

3. Purpose of Data Processing

Temporary storage of the IP address by the system is necessary for delivery of the website to the user's computer. For that purpose the user's IP address must be stored for the duration of the session.

Log files are stored to ensure the website's functionality. In addition, such data helps us to optimise the website and ensure security of our IT systems. In this connection the data will not be analysed for marketing purposes.

The said purposes also constitute our legitimate interest in data processing as defined in Art. 6 (1) (f) GDPR.

4. Storage Period

The data will be erased as soon as it is no longer required for achieving the purpose of its collection. If data is collected for provision of the website this will be the case as soon as the relevant session is terminated.

In the case of storage of data in log files this will be the case after a maximum of three (3) months. Storage beyond that period is possible. In that case the IP address of the users will be erased or alienated so that it can no longer be attributed to the retrieving client.

5. Possibility of Objection and Removal

Collection of data for provision of the website and storage of data in log files is mandatory for operation of the website. Accordingly, the user has no possibility to object.

VI. Use of Cookies

1. Nature and Scope of Data Processing

Our website uses cookies. Cookies are text files which are stored in the user's computer system in or by the internet browser. When a user retrieves a website, a cookie may be stored on the user's operating system. That cookie contains a characteristic string of characters which allows unambiguous identification of the browser when the website is retrieved again.

We use cookies to make the website more user-friendly. Some elements of our website require the possibility to identify the retrieving browser even after moving to another website.

The following data will be stored and transmitted in the cookies:

- (1) log-in information
- (2) whether or not the cookie notification was viewed
- (3) invoice address, if requested

Our website uses cookies which allow an analysis of the users' browsing behaviour.

The following data may be transmitted in this way:

- (1) frequency of site visits
- (2) Survey of the Austrian Web Analysis [*Österreichische Webanalyse/ÖWA*]

The user data which is collected in this way is pseudonymised by technical measures. Consequently, the data can no longer be attributed to the retrieving user. The data will not be stored together with other personal data of the users.

When retrieving our website an information banner will inform users about the use of cookies for analysing purposes and will refer to this data privacy statement.

2. Legal Basis for Data Processing

The legal basis for processing personal data by using cookies is Art. 6 (1) (f) GDPR.

3. Purpose of Data Processing

The purpose of using technically necessary cookies is to make use of websites easier for users. Some features of our website cannot be offered without the use of cookies. For those it is necessary for the browser to be recognised even after a move to another website.

We need cookies for the following applications:

- (1) log-in information
- (2) memorising the billing address
- (3) non-display of the cookie notification

The user data collected by technically necessary cookies will not be used to create user profiles.

The analytical cookies are used for the purpose of enhancing the quality and contents of our website. By means of analytical cookies we learn how the website is used and are thus able to constantly optimise our offer.

Analytical cookies count the visitors to the websites and record the behaviour on our websites. This allows us to optimise our websites so that users find the most frequently used functions more quickly.

The said purposes also constitute our legitimate interest in processing personal data as defined in Art. 6 (1) (f) GDPR.

4. Storage Period, Possibility of Objection and Removal

Cookies are stored on the user's computer and transmitted from there to our website. Thus, you as the user have full control over the use of cookies. By changing the settings in your

internet browser you can deactivate or restrict transmission of cookies. Cookies which have been stored already can be deleted at any time. This may also be done automatically. If cookies are deactivated for our website, use of all of the website's features may not be possible any longer.

VII. Newsletter

1. Nature and Scope of Data Processing

You may subscribe to a free newsletter on our website. When registering for the newsletter the data from the entry mask will be transmitted to us.

The following data will be collected during the registration process:

- (1) email address
- (2) name
- (3) IP address of the retrieving computer
- (4) date and time of registration

In connection with the registration process your consent to data processing will be obtained with reference to this Data Privacy Statement.

In connection with data processing for the sending of newsletters no data will be passed on to third parties. Data will exclusively be used for sending the newsletter.

2. Legal Basis for Data Processing

The legal basis for data processing after the user's registration for the newsletter is Art. 6 (1) (a) GDPR, provided that the user has given his consent thereto.

In addition, preparing and using interest and consumer behaviour profiles for target group segmentation constitutes legitimate processing of data for direct advertising purposes which is therefore permissible without the consent of the data subject. In cases where no consent was

given or where the consent is incorrect, we consider Art. 6 (1) (f) GDPR to be an effective legal basis.

3. Purpose of Data Processing

The collection of the user's email address serves the purpose of sending the newsletter.

Collection of other personal data in the course of the registration process serves the purpose of preventing misuse of the services or the email address used.

4. Storage Period

The data will be erased as soon as it is no longer required for achieving the purpose of its collection. Thus, the user's email address will be stored for as long as the subscription to the newsletter is active.

5. Possibility of Objection and Removal

Users may cancel their subscription to the newsletter at any time. A relevant link is contained in every newsletter.

This also allows withdrawal of consent to the storage of personal data collected during the registration process.

VIII. Contact Form and Email Contact

1. Nature and Scope of Data Processing

Our website provides a contact form which may be used for contacting us electronically. If a user chooses this option, the data entered in the entry mask will be transmitted to us and stored. This data includes:

- first name

- surname
- title
- company/business name
- email
- subject
- message

While the message is sent, the following data will also be stored:

- the user's IP address
- date and time of registration

Your consent to data processing will be obtained in connection with the sending process.

Alternatively, you may contact us via the email address provided. In that case the personal data of the user transmitted with the email message will be stored.

In this connection no data will be forwarded to third parties. Data will exclusively be used to process the conversation.

2. Legal Basis for Data Processing

The legal basis for data processing is Art. 6 (1) (a) GDPR, provided that the user has given his consent thereto.

The legal basis for processing data that is transmitted in the course of transmission of an email is Art. 6 (1) (f) GDPR. If the purpose of the email contact is conclusion of a contract, Art. 6 (1) (b) GDPR is an additional legal basis for processing.

3. Purpose of Data Processing

Personal data from the entry mask is processed by us only to reply to your enquiry. If you contact us via email, this constitutes the required legitimate interest in data processing.

Other personal data processed during the sending process is used to prevent misuse of the contact form and to ensure security of our IT systems.

4. Storage Period

The data will be erased as soon as it is no longer required for achieving the purpose of its collection. For personal data from the entry mask of the contact form and for data transmitted by email this is the case once the relevant conversation with the user is terminated. The conversation is deemed terminated if and when the circumstances suggest that the relevant matter has been clarified exhaustively.

The additional personal data collected during the sending process will be erased not later than after a period of seven days.

5. Possibility of Objection and Removal

The user may withdraw his consent to the processing of personal data at any time. If the user contacts us via email, he may object to storage of his personal data at any time. In such a case the conversation cannot be continued.

You may withdraw your consent and object to storage at any time via datenschutz@compass.at.

In that case all personal data stored during our contact will be erased.

IX. Web analysis by Matomo (formerly: PIWIK)

1. Scope of the Processing of Personal Data

On our website we use the open source software tool Matomo (formerly: PIWIK) to analyse the browsing behaviour of our users. The software places a cookie on the user's computer (see above for cookies). If specific pages of our website are retrieved, the following data will be stored:

- two bytes of the IP address of the user's retrieving system
- the website retrieved
- the website from which the user was referred to the retrieved website (referrer)
- the sub-pages retrieved from the retrieved website
- the time spent on the website
- the frequency with which the website is retrieved

The software runs exclusively on the servers of our website. Personal data of users is only stored there. Data is not passed on to third parties.

The software is set in such a way that the IP addresses are not stored completely, but 2 bytes of the IP address are masked (e.g. 192.168.xxx.xxx). Thus it is no longer possible to allocate the shortened IP address to the retrieving computer.

2. Legal Basis for the Processing of Personal Data

The legal basis for processing personal data of users is Art. 6 (1) (f) GDPR.

3. Purpose of Data Processing

Processing personal data of users allows us to analyse the browsing behaviour of our users. By analysing the data collected we are able to compile information on the use of specific components of our website. This helps us to continuously improve our website and its user-friendliness. The said purposes also constitute our legitimate interest in processing data as defined in Art. 6 (1) (f) GDPR. By anonymising the IP address the users' interest in protecting their personal data is sufficiently taken account of.

4. Storage Period

The data will be erased as soon as it is no longer required for recording purposes.

5. Possibility of Objection and Removal

Cookies are stored on the user's computer and transmitted from there to our website. Thus, you as the user have full control over the use of cookies. By changing the settings in your internet browser you can deactivate or restrict transmission of cookies. Cookies which have been stored already can be deleted at any time. This may also be done automatically. If cookies are deactivated for our website, use of all of the website's features may not be possible any longer.

On our website we provide our users with the option to opt out from the analysis procedure. To opt out you must follow the relevant link: (<https://piwik.compass.at/index.php?module=CoreAdminHome&action=optOut&language=de&backgroundcolor=&fontcolor=&fontsize=&fontfamily=>). In this way another cookie that signals to our system not to store the user's data is placed on their system. If users delete the relevant cookie from their own system in the meantime, they must set the opt-out cookie again.

For more detailed information on privacy settings of Matomo software please visit: <https://matomo.org/docs/privacy/>.

X. Advertising Services

1. Scope of the Processing of Personal Data

We use external services to offer you user-based online advertising. "User-based online advertising" is digital advertising which is based on anonymous analyses of internet users' browsing behaviour and is placed in accordance with their interests as assumed from the same. It is secure, transparent and consumer-friendly.

Subject to the user's consent, the user's IP address is processed by an external service provider. The service provider acts as a controller; such processing is not considered a processing activity of Compass-Verlag GmbH as defined in Art. 28 *et seq.* GDPR.

If no consent has been given, personal data will be used for sending non-personalised advertising but there will be not further processing.

2. Controller

The controller of the user IP is

Goldbach Audience Austria GmbH, FN [Business Register Number] 272245k

<http://www.goldbachaudience.at>

info@goldbachaudience.at

Phone: +43 1 370 88 08-0

Fax: +43 1 370 88 08-20

3. Legal Basis for the Processing of Personal Data

The legal basis for processing personal data is Art. 6 (1) (a) GDPR.

4. Purpose of Data Processing

User-based online advertising means collecting information on the browsing behaviour of anonymised users on the internet with the aim of creating user profiles by means of the information. For this purpose a multitude of profiles is combined into target groups to send out advertising that matches the user behaviour and, therefore, probably matches the interests of the relevant target group.

5. Storage Period

Data will generally be erased as soon as the purpose of its collection has been fulfilled.

6. Possibility of Objection and Removal

You may change your settings regarding user-based advertising on the relevant site at any time.

Requests for information and erasure must be sent to Goldbach Audience Austria GmbH, Laimgrubengasse 14, 1060 Vienna, FN 272245k.

XI. E-Commerce

1. Scope of the Processing of Personal Data

We provide a platform for the conclusion of purchase and service contracts.

In order to provide the same the following personal data will be processed:

- email
- first name & surname
- company/business name
- address
- products
- IP address for calculating VAT

2. Legal Basis for the Processing of Personal Data

The legal basis for processing personal data is Art. 6 (1) (b) GDPR.

3. Purpose of Data Processing

Storage of the data is necessary to buy our products and to issue an invoice.

4. Storage Period

Data will generally be erased as soon as the purpose of its collection has been fulfilled.

We are under a statutory obligation to retain invoices for seven (7) years.

5. Possibility of Objection and Removal

Collection and storage of data is mandatory for purchasing our products. Accordingly, the user has no possibility to object.

XII. Rights of the Data Subject

The following list includes all rights of data subjects under the GDPR. Rights which are of no relevance to our own website need not be mentioned. Thus, the list can be shortened.

If your personal data is processed, you are a data subject as defined in the GDPR and you have the following rights vis-à-vis the controller:

1. Right of Access

You may obtain confirmation from the controller as to whether personal data concerning you is being processed by us.

If such processing takes place, you may request the following information from the controller:

- (1) the purposes for which personal data is processed;
- (2) the categories of personal data that is being processed;
- (3) the recipients or categories of recipients to whom personal data concerning you has been or will be disclosed;

- (4) the envisaged period for which the personal data concerning you will be stored or, if there is no specific information in this regard, the criteria used to determine that period;
- (5) the existence of the right to rectification or erasure of the personal data concerning you, of a right of restriction of processing by the controller or of the right to object to processing;
- (6) the right to lodge a complaint with a supervisory authority;
- (7) all information available on the origin of data, if the personal data is not collected from the data subject;
- (8) the existence of automated decision-making, including profiling, as defined in Art. 22 (1) and (4) GDPR and, at least in these cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

You have the right to obtain information as to whether personal data concerning you will be transferred to a third country or an international organisation. In this respect you may request to be informed about appropriate safeguards as defined in Art. 46 GDPR in connection with the transfer.

This right of access may be restricted to the extent that it is likely to render impossible or to seriously impair the achievement of research or statistical purposes and that restriction is necessary for achieving research and statistical purposes.

2. Right to Rectification

You have a right to rectification and/or completion vis-à-vis the Controller if the processed personal data concerning you is incorrect or incomplete. The Controller must rectify the data immediately.

Your right to rectification may be restricted to the extent that it is likely to render impossible or to seriously impair the achievement of research or statistical purposes and that restriction is necessary for achieving research and statistical purposes.

3. Right to Restriction of Processing

You may request that the processing of personal data concerning you be restricted subject to the following prerequisites:

- (1) if you contest accuracy of the personal data concerning you for a time period that is long enough to enable the Controller to verify accuracy of the personal data;
- (2) processing is unlawful and you oppose erasure of the personal data and instead request restriction of use of the personal data;
- (3) the Controller no longer needs the data for the purposes of processing, however you need the data for the establishment, exercise or defence of legal claims, or
- (4) you object to processing pursuant to Art 21 (1) GDPR and it is yet to be determined whether the Controller's legitimate grounds outweigh your grounds.

If processing of personal data concerning you has been restricted, any other processing, except for storage, is only permissible upon your consent or for the establishment, exercise or defence of legal claims or to protect the rights of another natural or a legal person or on grounds of an important public interest of the European Union or a Member State.

If processing has been restricted pursuant to the above-mentioned prerequisites, the Controller will inform you before the restriction is lifted.

Your right to restriction of processing may be restricted to the extent that it is likely to render impossible or to seriously impair the achievement of research or statistical purposes and that restriction is necessary for achieving research and statistical purposes.

4. Right to Erasure

a) Obligation to erase personal data

You have the right to obtain from the Controller the erasure of personal data concerning you without undue delay and the Controller shall have the obligation to erase this data without undue delay where one of the following reasons applies:

- (1) The personal data concerning you is no longer necessary for to the purposes for which it was collected or processed in any other way.
- (2) You withdraw your consent on which the processing was based pursuant to Art. 6 (1) (a) or Art. 9 (2) (a) GDPR and there is no other legal basis for processing.
- (3) You object to processing pursuant to Art. 21 (1) GDPR and there are no prevailing legitimate grounds for processing, or you object to processing pursuant to Art. 21 (2) GDPR.
- (4) The personal data concerning you was processed unlawfully.
- (5) Erasure of the personal data concerning you is necessary to comply with a legal obligation under Union or Member State law to which the Controller is subject.
- (6) The personal data concerning you was collected in connection with services of the information society offered as defined in Art. 8 (1) GDPR

b) Information to Third Parties

If the Controller has made the personal data concerning you public and if he is obliged to erase them pursuant Art. 17 (1) GDPR, he should take reasonable steps, taking into account available technology and the cost of implementation, including technical measures, to inform controllers who process the personal data that you as the data subject have asked them to delete all links to this personal data or copies or replications of this personal data.

c) Exceptions

The right to erasure does not apply to the extent that processing is necessary for

- (1) exercising the right of freedom of expression and information;
- (2) fulfilling a legal obligation that requires processing under Union or Member State law to which the Controller is subject, or for fulfilling a task which is in the public interest or which is undertaken in the exercise of official authority that was conferred on the Controller;
- (3) reasons of public interest in the area of public health care as defined in Art. 9 (2) (h) and (i) as well as Art. (9) (3) GDPR;
- (4) archiving purposes in the public interest, scientific or historical research purposes or statistical purposes as defined in Art. 89 (1) GDPR to the extent that the right stated in paragraph (a) is likely to render impossible or seriously impair achievement of the aims of such processing, or
- (5) the establishment, exercise or defence of legal claims.

5. Right to be Notified

If you have exercised your right to rectification, erasure or restriction of processing vis-à-vis the Controller, the Controller must notify all recipients to whom personal data concerning you has been disclosed of such rectification or erasure of data or restriction of processing, unless this proves impossible or involves disproportionate effort.

You have the right vis-à-vis the Controller to be informed about those recipients.

6. Right to Data Portability

You have the right to receive the personal data which you have provided to the Controller in a structured, commonly used and machine-readable format. Furthermore you have the right to transmit this data to another controller without hindrance by the controller to whom the personal data has been provided, where

- (1) processing is based on consent pursuant to Art. 6 (1) (a) GDPR or Art. 9 (2) (a) GDPR or on a contract pursuant to Art. 6 (1) (b) GDPR; and
- (2) processing is carried out by automated means.

By exercising this right you also have the right to request that the personal data concerning you be directly transmitted from one controller to another controller to the extent that this is technically feasible. Freedoms or rights of other persons must not be detrimentally affected thereby.

The right to data portability does not apply to the processing of personal data which is necessary for fulfilling a task which is in the public interest or undertaken for exercising official authority that was conferred on the Controller.

7. Right to Object

You have the right, on grounds relating to your particular situation, to object to processing of personal data concerning you on the basis of Art. 6 (1) (e) or (f) GDPR at any time; this shall also apply to profiling that is based on these provisions.

In that case the Controller will no longer process the personal data concerning you unless he is able to demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

If the personal data concerning you is processed for direct marketing purposes, you have the right to object to processing of the personal data relating to you for the purpose of such advertising at any time; this shall also apply to profiling to the extent that it is connected to such direct marketing.

If you object to processing for the purpose of direct marketing, the personal data concerning you will no longer be used for these purposes.

In connection with using information society services you may, irrespective of Directive 2002/58/EC, exercise your right to object by automated means for which technical specifications are used.

You also have the right, on grounds relating to your particular situation, to object to processing of personal data concerning you for scientific or historical research purposes or for statistical purposes as defined in Art. 89 (1) GDPR.

Your right to object may be restricted to the extent that it is likely to render impossible or seriously impair the achievement of the research purposes or statistical purposes and that restriction is necessary for achieving these research and statistical purposes.

8. Right to Withdraw Consent Given under Data Protection Law

You may withdraw your consent given under data protection law at any time. The lawfulness of processing done up to the time of withdrawal shall not be affected by withdrawing consent.

9. Automated Individual Decision-making Including Profiling

You have the right not to be subject to any decision that is exclusively based on automated processing, including profiling, which would become legally effective vis-à-vis you or would significantly affect you detrimentally in a similar way. This shall not apply if the decision

- (1) is necessary for concluding or performing a contract between you and the Controller,
- (2) is permissible due to legal provisions of Union or Member State law to which the Controller is subject and if these legal provisions include appropriate measures to safeguard your rights and freedoms as well as your legitimate interests or
- (3) is made upon your express consent.

However, these decisions must not be based on special categories of personal data as defined in Art. 9 (1) GDPR unless Art. 9 (2) (a) or (g) GDPR applies and appropriate measures to safeguard your rights and freedoms as well as your legitimate interests have been taken.

With regard to the cases stated in paragraph (1) and (3) the Controller shall take appropriate measures to safeguard your rights and freedoms as well as your legitimate interests, including at least the right to obtain human intervention on the part of the Controller, to express his point of view and to contest the decision.

10. Right to Lodge a Complaint with a Supervisory Authority

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement, if you consider that the processing of personal data concerning you infringes the GDPR.

The supervisory authority with which the complaint has been lodged shall inform the complainant on the progress or outcome of the complaint, including the option of a judicial remedy as defined in Art. 78 GDPR.