

Thank you for your interest in SiRcom Gesellschaft für Systemintegration und Kommunikationstechnik mbH.

SiRcom Gesellschaft für Systemintegration und Kommunikationstechnik mbH fulfills the data protection obligations according to the General Data Protection Regulation (GDPR) for the website www.sircom.de, so you can contact them at any time. You can find the contact details below, under section 2.

You can generally use the website www.sircom.de without providing any personal data. If an affected person wishes to use our services through the website, the processing of personal data may become necessary. If the processing of personal data is required and there is no legal basis for such processing, we always obtain the consent of the affected person.

The processing of personal data (e.g., name, address, email address, or phone number of an affected person) is always carried out in accordance with the General Data Protection Regulation (GDPR) and in compliance with the country-specific data protection regulations applicable to us, particularly the Federal Data Protection Act (BDSG). With the following privacy policy, we would like to inform the public about the type, scope, and purpose of the personal data we collect, use, and process. Affected persons are also informed of their rights through this privacy policy.

As the data controller, we have implemented numerous technical and organizational measures to ensure the most complete protection of personal data processed through this website.

However, data transmissions over the Internet can generally contain security vulnerabilities. Thus, a hundred percent protection cannot be guaranteed. Therefore, any affected person can alternatively transmit personal data to the company, for example, by telephone.

1. Definitions

This privacy policy is based on the definitions used by the European legislator when enacting the GDPR. The privacy policy is intended to be both easily readable and understandable for every person. To ensure this, the terminology used will first be explained. In this privacy policy, the following definitions, among others, are used:

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

"Data Subject" means any identified or identifiable natural person whose personal data is processed by the controller responsible for the processing.

"Processing" means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction;

"Restriction of Processing" means the marking of stored personal data with the aim of limiting their processing in the future;

"Profiling" means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location, or movements;

"Controller" means the natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

"Recipient" means a natural or legal person, public authority, agency, or another body to which personal data is disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

"Third Party" means a natural or legal person, public authority, agency, or body other than the data subject, controller, processor, and persons who, under the direct authority of the controller or processor, are authorized to process personal data;

"Consent" of the data subject means any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

2. Name and Contact Details of the Controller:

For all questions related to data protection, you can contact:

Public Media GmbH
Waldstr. 1
ABling – Germany
Email: datenschutz@pub-media.de
Phone: (+49) 8121 9194 – 0
Fax: (+49) 8121 9194 – 10

3. Contact Details of the Data Protection Officer:

Ms. Susanne von Raben
Public Media GmbH
Waldstr. 1
ABling – Germany
Email: datenschutz@pub-media.de
Phone: (+49) 8121 9194 – 0
Fax: (+49) 8121 9194 – 10

Any data subject can contact the Data Protection Officer directly at any time with any questions or suggestions regarding data protection.

4. Deletion and Blocking of Personal Data

We process and store personal data of the data subject only for the period necessary to achieve the storage purpose or as required by applicable laws to which the controller is subject. If the storage purpose ceases to apply or a legally prescribed storage period expires, the personal data is routinely blocked or deleted in accordance with statutory provisions.

5. Collection and Storage of Personal Data and the Type and Purpose of Their Use

a) When Visiting the Website

You can use this website without disclosing your identity. When you access the website, information is automatically sent to the server of the website by the browser used on your end device. This information is temporarily stored in a so-called log file. The following information is recorded without any action on your part and stored until automated deletion:

- IP address of the requesting computer,
- Date and time of access,
- Name and URL of the retrieved file,
- Website from which the access is made (referrer URL),
- Browser used and, if applicable, the operating system of your computer as well as the name of your access provider.

The company processes this data for the following purposes:

- Ensuring a smooth connection setup of the website,
- Ensuring a comfortable use of the website,

- Evaluation of system security and stability, and
- For other administrative purposes.

The legal basis for data processing is Art. 6(1) sentence 1 (f) GDPR. The legitimate interest of the company follows from the above-listed purposes for data collection. Under no circumstances do we use the collected data for the purpose of drawing conclusions about your person. The data is deleted after 14 days at the latest.

Furthermore, we use cookies and analysis services when you visit the website. Detailed explanations can be found in sections 9 and 11 of this privacy policy.

b) When Using the Contact Form or Contacting Us via Email

For any kind of questions, we offer you the opportunity to contact the company via a form provided on the website or via email. A valid email address is required so that we know who the inquiry is from and to be able to respond to it. Additional information can be provided voluntarily. It is your free decision to enter these data within the contact form or in the email.

The processing of the entered data is carried out to handle your request. The data is deleted immediately after processing your request, provided there are no legal retention periods.

The legal basis for data processing is Art. 6(1) sentence 1 (b) GDPR if the inquiry is necessary for the performance of a contract or for pre-contractual measures, and Art. 6(1) sentence 1 (c) GDPR in the case of legal retention requirements. Otherwise, it is based on legitimate interests pursuant to Art. 6 (1) sentence 1 (f) GDPR. We have a legitimate interest in processing your inquiries that are not of a pre-contractual or contractual nature to provide you with the best possible service.

The data is processed exclusively for responding to your inquiry and is retained for the duration of the statutory retention obligation (6 years according to § 257 (1) no. 2, (4) of the German Commercial Code HGB)) if it concerns commercial letters. Otherwise, the data is deleted immediately after responding to your inquiry.

6. Further Explanation of the Legal Basis for Processing

Art. 6 (I) (a) GDPR serves as our legal basis for processing operations where consent is obtained for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which the data subject is a party, the processing is based on Art. 6 (I) (b) GDPR. The same applies to processing operations necessary for pre-contractual measures, such as inquiries about our services and products. If we are subject to a legal obligation that requires the processing of personal data, the processing is based on Art. 6 (I) (c) GDPR. In rare cases, the processing of personal data may be necessary to protect the vital interests of the data subject or another natural person. In such cases, the processing is based on Art. 6 (I) (d) GDPR. Additionally, processing operations may be based on Art. 6 (I) (f) GDPR. This legal basis applies to processing operations not covered by any of the aforementioned legal bases if the processing is necessary for the purposes of the legitimate interests pursued by us or a third party, provided that these interests are not overridden by the interests, fundamental rights, and freedoms of the data subject. Such processing operations are particularly permitted because they have been specifically mentioned by the European legislator (see Recital 47 Sentence 2 GDPR).

7. Consideration of Legitimate Interests

If the processing of personal data is based on Article 6 (I) (f) GDPR, our legitimate interest is the performance of our business activities in favor of the well-being of all our employees and shareholders.

8. Use of Cookies

We use cookies on our website. These are small files that your browser automatically creates and that are stored on your end device (laptop, tablet, smartphone, etc.) when you visit our website. Cookies do not harm your device, do not contain viruses, Trojans, or other malware.

The cookie stores information that is generated in connection with the specific end device used. However, this does not mean that we immediately become aware of your identity.

The use of cookies serves on one hand to make the use of our offer more pleasant for you. For example, we use session cookies to recognize that you have already visited individual pages of our website. These are automatically deleted after you leave our site. In addition, we also use temporary cookies to optimize user-friendliness, which are stored on your end device for a specific fixed period. If you visit our site again to use our services, it is automatically recognized

that you have already been with us and which entries and settings you have made so that you do not have to enter them again.

On the other hand, we use cookies to statistically record the use of our website and to evaluate it for the purpose of optimizing our offer (see section 9). These cookies allow us to automatically recognize when you return to our site that you have already been with us. These cookies are automatically deleted after a defined period, at the latest after 6 months. You can delete the cookies earlier through your browser settings. Please refer to your browser's help pages for guidance.

The data processed by cookies is necessary for the aforementioned purposes to protect our legitimate interests and those of third parties pursuant to Art. 6(1) sentence 1 (f) GDPR.

Most browsers accept cookies automatically. However, you can configure your browser to prevent cookies from being stored on your computer or to always receive a notice before a new cookie is set. Completely disabling cookies may result in you not being able to use all functions of our website.

9. Analysis and Tracking Tools

The tracking measures listed below and used by us are carried out on the basis of Art. 6(1) sentence 1 (f) GDPR. With the tracking measures used, we want to ensure a needs-based design and the ongoing optimization of our website. On the other hand, we use the tracking measures to statistically record the use of our website and to evaluate it for the purpose of optimizing our offer. These interests are considered legitimate within the meaning of the aforementioned provision.

The respective data processing purposes and data categories can be found in the relevant tracking tools.

10. Google Analytics

This website uses Google Analytics, a web analytics service provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). Google Analytics uses "cookies," text files that are stored on your computer and that allow an analysis of your use of the website. The information generated by the cookie about your use of this website is usually transmitted to a Google server in the USA and stored there. We inform you that Google Analytics has been extended on this website to include the code "anonymizelp" to ensure the anonymized collection of IP addresses (so-called IP masking). Your IP address will be truncated by Google within member states of the European Union or in other contracting states of the Agreement on the European Economic Area before the transmission to the USA. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and truncated there. On behalf of the operator of this website, Google will use this information to evaluate your use of the website, to compile reports on website activity, and to provide other services related to website activity and internet usage to the website operator. The IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data. You can prevent the storage of cookies by selecting the appropriate settings on your browser software; however, we point out that in this case, you may not be able to use all functions of this website to their full extent. You can also prevent the collection of data generated by the cookie and related to your use of the website (including your IP address) by Google and the processing of this data by Google by downloading and installing the browser plugin available under the following link: <http://tools.google.com/dlpage/gaoptout?hl=de>.

You can prevent the collection by Google Analytics by clicking on the following link. An opt-out cookie will be set to prevent the future collection of your data when visiting this website: [Deactivate Google Analytics](#)

Further information on terms of use and data protection can be found at:

- <http://www.google.com/analytics/terms/de.html>
- <https://www.google.com/intl/de/policies/privacy/partners/>
- <https://policies.google.com>

The storage of the IP address and other personal data is only within the minimum period of Google Analytics, which is 14 months.

11. Social Media Plugins

We use social media plugins of social networks (e.g., Facebook, Twitter, Google+) on our website based on Art. 6(1) sentence 1 (f) GDPR to make our company better known through these. The underlying promotional purpose is to be considered a legitimate interest within the meaning of the GDPR. The responsibility for the data protection-compliant operation is to be ensured by their respective providers. The integration of these plugins by us is carried out by means of the so-called two-click method to protect visitors to our website in the best possible way.

a) YouTube

This website uses YouTube videos in the privacy-friendly two-click method, i.e., processing of personal data only takes place when you activate the plugin by clicking on it. YouTube plugins are provided by YouTube LLC, 901 Cherry Ave., San Bruno, CA 94066, USA. YouTube LLC is a subsidiary of Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043-1351, USA.

When the plugins are activated, information is sent to YouTube LLC and possibly Google Inc. in the USA. YouTube and Google are then able to see that you have visited our site. If you are logged into your YouTube or Google account when the plugins are activated, YouTube and/or Google may be able to identify you directly.

We inform you that as the provider of this website, we have no knowledge of the data transmitted to YouTube and Google, the purposes of data collection, or its use by Facebook. Further information on the collected data can be found in the Google privacy policy, which you can access at: <https://policies.google.com/privacy?hl=de>.

We cannot make any statements regarding the duration of storage as this is solely under the influence and responsibility of YouTube or Google.

b) Google Maps

This website includes a Google Maps map to show you our locations. As soon as you call up our website with the Google Maps map, a connection is established to Google servers, and personal data may be transmitted to Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. If you are logged into your Google account, Google may be able to identify you directly. If you do not want this, log out of your Google account.

The Google privacy policy can be found here: <https://policies.google.com/privacy?hl=de>.

12. Job applications

If you apply to us via our career page or by email, your personal data will be processed for the purpose of processing your application. The legal basis is § 26 BDSG (data processing for employment purposes) and Art. 6(1) sentence 1 (f) GDPR (legitimate interest). Your data will be deleted six months after the rejection of your application. We have a legitimate interest in retaining the data even after the rejection of your application for six months to defend against claims under the General Equal Treatment Act (AGG).

13. Rights of Data Subjects

You have the right to:

Access: Request information about your personal data processed by us according to Art. 15 GDPR. In particular, you can request information about the processing purposes, the category of personal data, the categories of recipients to whom your data has been disclosed, the planned storage period, the existence of a right to rectification, erasure, restriction of processing, or objection, the existence of a right to lodge a complaint, the source of your data if it was not collected from us, and the existence of automated decision-making including profiling and, if applicable, meaningful information about their details.

Rectification: Request the immediate correction of incorrect or completion of your personal data stored by us according to Art. 16 GDPR.

Erasure: Request the deletion of your personal data stored by us according to Art. 17 GDPR, unless the processing is necessary for exercising the right of freedom of expression and information, for compliance with a legal obligation, for reasons of public interest, or for the establishment, exercise, or defense of legal claims.

Restriction: Request the restriction of the processing of your personal data according to Art. 18 GDPR, as far as the accuracy of the data is disputed by you, the processing is unlawful, but you oppose its erasure, and we no longer need the data, but you require it for the establishment, exercise, or defense of legal claims, or you have objected to the processing according to Art. 21 GDPR.

Data Portability: Receive your personal data that you have provided to us in a structured, commonly used, and machine-readable format or request the transfer to another controller according to Art. 20 GDPR.

Withdraw Consent: Withdraw your consent at any time according to Art. 7(3) GDPR. This means that we are not allowed to continue processing data based on this consent in the future.

Lodge a Complaint: Lodge a complaint with a supervisory authority according to Art. 77 GDPR. You can generally contact the supervisory authority of your usual place of residence or workplace or our company's headquarters. An overview of the supervisory authorities can be found here: https://www.bfdi.bund.de/DE/Infothek/Anschriften_Links/anschriften_links-node.html; the supervisory authority generally responsible for SiRcom Gesellschaft für Systemintegration und Kommunikationstechnik mbH is the

Bavarian State Office for Data Protection Supervision
Promenade 27 (Schloss)
91522 Ansbach
Germany

T +49 98153 1300
F + 49 98153 5300
poststelle@lda.bayern.de
<http://www.lda.bayern.de>

14. Right to object

If your personal data is processed based on legitimate interests according to Art. 6(1) sentence 1 lit. f GDPR, you have the right to object to the processing of your personal data according to Art. 21 GDPR, as far as there are reasons for this arising from your particular situation, or the objection is directed against direct advertising. In the latter case, you have a general right of objection that we will implement without specifying a particular situation.

If you wish to exercise your right of withdrawal or objection, simply send an email to: datenschutz@pub-media.de

15. Data Security

We use the widespread SSL (Secure Socket Layer) method in connection with the highest level of encryption supported by your browser during your visit to our website. As a rule, this is 256-bit encryption. If your browser does not support 256-bit encryption, we will instead use 128-bit v3 technology. You can tell whether an individual page of our website is encrypted by the closed display of the key or lock symbol in the lower status bar of your browser.

We also take appropriate technical and organizational security measures to protect your data against accidental or intentional manipulation, partial or complete loss, destruction, or unauthorized access by third parties. Our security measures are continuously improved in line with technological developments.

16. Updating and Changing this Privacy Policy

This privacy policy is currently valid and was most recently amended in January 2020.. Due to the further development of our website and offers above or due to changed legal or regulatory requirements, it may become necessary to change this privacy policy.