

# Privacy policy

TKM attaches great importance to the protection of your personal data and your privacy.

TKM provides the TKM Group website at [tkmgroup.com](https://tkmgroup.com). This website provides information about products and services of the TKM Group.

Below you will find information about the controller, who is responsible for processing your personal data and the controller's data protection officer (**section A**) as well as about your rights regarding the processing of your personal data (**section B**).

You will also find below information on the processing of your personal data (**section C**) and information on the use of cookies (**section D**) in connection with the website and the services provided on the website.

## A. Information about the controller

### I. Name and contact details of the controller

TKM GmbH  
In der Fleute 19, 42897 Remscheid, Germany  
Phone: +49 (0) 2191 969 0  
Fax: +49 (0) 2191 969 111  
E-mail: [info@tkmgroup.com](mailto:info@tkmgroup.com)

### II. Contact details of the controller's data protection officer

Hermine Hellbeck  
In der Fleute 18,  
42897 Remscheid, Germany  
[hhellbeck@tkmgroup.com](mailto:hhellbeck@tkmgroup.com)  
+49 2191 969 320

## B. Information on the rights of data subjects

As a data subject, you have the following rights with regard to the processing of your personal data:

- Right of access (Article 15 of the General Data Protection Regulation)
- Right to rectification (Article 16 of the General Data Protection Regulation)
- Right to erasure (“right to be forgotten”) (Article 17 of the General Data Protection Regulation)
- Right to restriction of processing (Article 18 of the General Data Protection Regulation)
- Right to data transferability (Article 20 of the General Data Protection Regulation)
- Right of objection (Article 21 of the General Data Protection Regulation)
- Right to withdraw consent (Article 7(3) of the General Data Protection Regulation)
- Right of appeal to the supervisory authority (Article 57(1)(f) of the General Data Protection Regulation)

To exercise your rights, please contact our data protection officer (section A.II.).

Information on any specific modalities and mechanisms that may facilitate the exercise of your rights, in particular to exercise your rights to data transferability and objection, may be found in the information on the processing of personal data in Section C of this Privacy Policy.

Below you will find more detailed information about your rights regarding the processing of your personal data:

### I. Right to information

As a data subject, you have a right to information (access) under the conditions of Article 15 of the General Data Protection Regulation.

In particular, this means that you have the right to request confirmation from us as to whether we are processing personal data relating to you. If this is the case, you also have a right of access to this personal data and to the information listed in Article 15(1) of the General Data Protection Regulation. These include, for example, information on the processing purposes, the categories of personal data being processed and the recipients or categories of recipients to whom the personal data have been or are still being disclosed (Article 15(1)(a), (b) and (c) of the General Data Protection Regulation).

You can find the full scope of your right to information in Article 15 of the General Data Protection Regulation, which can be downloaded from the following link: <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>.

## II Right to Rectification

As a data subject, you have a right to rectification under the conditions of Article 16 of the General Data Protection Regulation.

This means in particular that you have the right to request us to correct any incorrect personal data concerning you and to complete incomplete personal data without delay.

The full scope of your right to rectification can be found in Article 16 of the General Data Protection Regulation, which can be downloaded from the following link: <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>.

## III. Right to erasure (“right to be forgotten”)

As a data subject, you have a right to erasure (“right to be forgotten”) under the conditions of Article 17 of the General Data Protection Regulation.

This generally means that you have the right to request us to delete personal data concerning you immediately and we are obliged to delete personal data immediately if one of the reasons listed in Article 17 paragraph 1 of the General Data Protection Regulation applies. This may be the case, for example, where personal data are no longer necessary for the purposes for which they were collected or otherwise processed (Article 17(1)(a) of the General Data Protection Regulation).

If we have made the personal data public and we are obliged to delete them, we are also obliged, taking into account the available technology and the implementation costs, to take appropriate measures, including technical measures, to inform other controllers who process the personal data, that a data subject has requested that they delete all links to this personal data or copies or replications of this personal data (Article 17 paragraph 2 of the General Data Protection Regulation).

The right to erasure (“right to be forgotten”) shall not apply exceptionally where processing is necessary for the reasons set out in Article 17(3) of the General Data Protection Regulation. This may be the case, for example, where processing is necessary to fulfil a legal obligation or to assert, exercise or defend legal claims (Article 17(3)(a) and (e) of the General Data Protection Regulation).

The full scope of your right to erasure can be found in Article 17 of the General Data Protection Regulation, which can be downloaded from the following link: <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>.

## IV. Right to restriction of processing

As a data subject, you have a right to have processing restricted under the conditions set out in Article 18 of the General Data Protection Regulation.

This means that you have the right to request us to restrict processing if one of the conditions set out in Article 18(1) of the General Data Protection Regulation is met. This may be the case, for example, if you dispute the accuracy of your personal data. In this case, the processing is limited for a period that allows us to verify the accuracy of the personal data (Article 18(1)(a) of the General Data Protection Regulation).

Restriction means the marking of stored personal data with the aim of restricting their future processing (Article 4(3) of the General Data Protection Regulation).

The full scope of your right to restrict processing can be found in Article 18 of the General Data Protection Regulation, which can be downloaded from the following link:  
<http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>.

## V. Right to data transferability

As a data subject, you have a right to data transferability under the conditions of Article 20 of the General Data Protection Regulation.

This means that basically you have the right to receive the personal data concerning you that you have provided to us in a structured, current and machine-readable format and you have the right to transmit this data to another controller without our interference, provided that the processing is based on a consent pursuant to Article 6(1)(a) or Article 9(2)(a) of the General Data Protection Regulation or on a contract pursuant to Article 6(1)(b) of the General Data Protection Regulation and the processing is carried out using automated procedures (Article 20(1) of the General Data Protection Regulation).

Information as to whether the processing is based on consent pursuant to Article 6(1)(a) or Article 9(2)(a) of the General Data Protection Regulation or on a contract pursuant to Article 6(1)(b) of the General Data Protection Regulation can be found in the information on the legal bases for processing in Section C of this Privacy Policy.

When exercising your right to data transferability, you also have the fundamental right to request that the personal data be transferred directly by us to another controller, insofar as this is technically feasible (Article 20(2) of the General Data Protection Regulation).

The full scope of your right to restrict processing can be found in Article 20 of the General Data Protection Regulation, which can be downloaded from the following link:  
<http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>.

## VI. Right of objection

As the data subject, you have a right of objection under the conditions of Article 21 of the General Data Protection Regulation.

We expressly point out your right of objection to you as a data subject at the latest at the time of the first communication with you.

Below you will find more detailed information on this matter:

### 1. The right to object on grounds arising from the particular situation of the data subject

As a data subject, you have the right to object at any time to the processing of personal data concerning you under Article 6(1)(e) or (f) of the General Data Protection Regulation for reasons arising from your particular situation, including profiling based on these provisions.

Information on whether processing is based on Article 6(1)(e) or (f) of the General Data Protection Regulation can be found in the information on the legal bases for

processing in Section C of this Privacy Policy.

In the event of an objection for reasons arising from your particular situation, we will no longer process the personal data concerned, unless we can prove compelling grounds for processing that outweigh your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

The full scope of your right of objection can be found in Article 21 of the General Data Protection Regulation, which can be downloaded from the following link: <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>.

## 2. The right to object to direct advertising

If personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for the purpose of such advertising; this also applies to profiling, insofar as it is associated with such direct marketing.

Information on whether and to what extent personal data is processed for direct marketing purposes can be found in the information for the purposes of processing in Section C of this Privacy Policy.

In the event of an objection to processing for direct marketing purposes, we will no longer process the personal data concerned for these purposes.

The full scope of your right of objection can be found in Article 21 of the General Data Protection Regulation, which can be downloaded from the following link: <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>.

## VII. Right to revoke consent

### 1. General information

If the processing is based on consent pursuant to Article 6(1)(a) or Article 9(2)(a) of the General Data Protection Regulation, you as a data subject have the right to withdraw your consent at any time pursuant to Article 7(3) of the General Data Protection Regulation. The revocation of consent shall not affect the legality of the processing carried out on the basis of the consent until revocation. We will inform you of this before giving your consent.

Information on whether processing is based on consent under Article 6(1)(a) or Article 9(2)(a) of the General Data Protection Regulation can be found in the information on the legal bases for processing in Section C of this Privacy Policy.

## 2. Revocation of consent to the use of web analysis technologies

On our website you have the opportunity to consent to the use of cookie-based web analysis technologies by us. See in detail sections C.II and D.III of this Privacy Policy. These consents can be given below or you can revoke an already given consent:

### VIII. Right of appeal to the supervisory authority

As a data subject, you have the right of appeal to the competent supervisory authority under the conditions laid down in Article 57(1)(f) of the General Data Protection Regulation.

The supervisory authority responsible for us is:

Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen

Kavalleriestr. 2-4, 40213 Düsseldorf, Germany

Phone: +49 (0) 211 38424-0

Fax: +49 (0)211 38424-10

E-mail: [poststelle@ldi.nrw.de](mailto:poststelle@ldi.nrw.de)

Internet: <https://www.ldi.nrw.de>

## C. Information on the processing of personal data

In connection with the website and the offers made available on the website, various personal data are processed for various purposes. For example, we process certain log data that is technically required when you access the website in order to make the content of the website available to you.

If we as the so-called controller decide alone or together with others about the purposes and means of the processing of personal data, you will in particular receive information about:

- the personal data or categories of personal data being processed,
- the purposes for which the personal data are to be processed,

- the legal basis for the processing and, where the processing is based on Article 6(1)(f) of the General Data Protection Regulation, the legitimate interests pursued by us or a third party,
- where appropriate, the recipients or categories of recipients of the personal data,
- where appropriate, our intention to transfer the personal data to a third country or international organisation and the existence or absence of an adequacy decision of the Commission, or, in the case of transfers pursuant to Article 46 or Article 47 of the General Data Protection Regulation or the second subparagraph of Article 49(1) of the General Data Protection Regulation, a reference to the appropriate guarantees and the possibility of obtaining a copy of them or where they are available,
- the duration for which the personal data are stored or, if this is not possible, the criteria for determining this duration,
- the existence of automated decision-making, including profiling, in accordance with Article 22(1) and (4) of the General Data Protection Regulation and, at least in these cases, meaningful information on the logic involved and the scope and intended effects of such processing for you.

If we collect your personal data from you as a data subject, you will also be informed below as to whether the provision of the personal data is required by law or contract or is necessary for the conclusion of a contract, whether you are obliged to provide the personal data and what possible consequences this would have.

If we do not collect personal data from you as the data subject, you will also receive information as to the source of the personal data and, if applicable, whether they originate from publicly accessible sources.

## I. Informational use of the website

In the purely informational use of the website, certain information is sent to the server of our website by the browser used on your terminal device for technical reasons, for example your IP address. We process this information to provide the content of the website you are visiting. To ensure the security of the IT infrastructure used to provide the website, this information is also temporarily stored in a so-called web server log file.

Below you will find more detailed information on this matter:

## 1. Details of the personal data being processed

Categories of personal data to be processed	Personal data contained in the categories	Sources of data	Obligation to provide the data	Retention time
Protocol data that is technically generated when the website is accessed via the Hypertext Transfer Protocol (Secure) (HTTP(S)) (“HTTP data”).	IP address, type and version of your Internet browser, operating system used, the page accessed, the previously visited page (referrer URL), date and time of access.	Users of the website.	<p>Provision is not required by law or contract or required for the conclusion of a contract. There is no obligation to provide the data.</p> <p>In the event that the data is not made available, we cannot provide the content accessed on the website.</p>	<p>Data is stored in server log files in a form that allows identification of the persons concerned for a maximum period of 7 days, unless a security-relevant event occurs (e.g. a DDoS attack).</p> <p>In the case of a security-relevant event, server log files are stored until the security-relevant event is eliminated and completely cleared up.</p>
data stored in essential cookies (section D) for the administration of cookie consents for this website on the user's end device (“opt-in cookie data”)	Consent and, if necessary, your individual selection for the use of cookies on your terminal.	Users of the website.	<p>Provision is not required by law or contract or required for the conclusion of a contract. There is no obligation to provide the data.</p> <p>In the event that the data is not provided, we cannot take cookie consents on this website into account.</p>	<p>We do not store this data on our systems.</p> <p>For the validity period of the cookie see section D.III</p>



## 2 Details on the processing of personal data

Purpose of the processing of personal data	Categories of personal data to be processed	Automated decision making	Legal basis and, if applicable, legitimate interests	Recipient
HTTP data is temporarily processed on our web server to provide the contents of the website accessed by the user.	HTTP-Daten.	No automated decision making takes place.	Balancing of interests (Article 6(1)(f) of the basic Regulation on data protection). Our legitimate interest is the provision of the contents of the website accessed by the user.	Hosting-Provider.
To guarantee the security of the IT infrastructure used for the provision of the website, in particular for the detection, elimination and conclusive documentation of faults (e.g. DDoS attacks), HTTP data is temporarily processed in web server log files.	HTTP-Daten.	No automated decision making takes place.	Balancing of interests (Article 6(1)(f) of the basic Regulation on data protection). Our legitimate interest is to guarantee the security of the IT infrastructure used for the provision of the website, in particular for the detection, elimination and conclusive documentation of faults (e.g. DDoS attacks).	Hosting-Provider.
In order to provide the administration of the cookie consents for this website, data from absolutely necessary cookies (section D) is temporarily processed on our web server in order to determine whether you have already given your consent the next time you visit the website.	Opt-in cookie data.	No automated decision making takes place.	Balancing of interests (Article 6(1)(f) of the General Data Protection Regulation). Our legitimate interest is the administration of the cookie consent given by the user for this website.	Hosting-Provider.

## 3. Details on the recipients of personal data and the transfer of personal data to third countries and/or international organisations

Recipient	Role of the recipient	Seat of the receiver	Adequacy decision or appropriate or appropriate safeguards for transfers to third countries and/or international organisations
Hosting-Provider	Auftragsverarbeiter	EU	-

## II. Use of web analysis technologies

If you have given your consent, we also use web analysis technologies in order to use cookies (à section D of this data protection information) to record and analyse the usage behaviour on our website in order to improve the website and to better achieve website goals (e.g. frequency of visits, increase page impressions). If you have given your consent, you can revoke it at any time in Section B.VII.2 of this Privacy Policy.

Below you will find more detailed information on this matter:

### 1. Details of the personal data being processed

Categories of personal data to be processed	Personal data contained in the categories	Sources of data	Obligation to provide the data	Retention time
Protocol data that is technically generated when using the Matomo web analysis tool used on the website via the Hypertext Transfer Protocol (Secure) (HTTP(S)) (“Matomo HTTP data”).	IP address, type and version of your Internet browser, operating system used, the page accessed, the previously visited page (referrer URL), date and time of access, details of the terminal device used (desktop PC, mobile device, brand of mobile device).	Users of the website.	Provision is not required by law or contract or required for the conclusion of a contract. There is no obligation to provide the data.  If the data is not provided, we cannot carry out a web analysis.	IP anonymisation is activated on this website for the use of the web analysis tool Matomo. This means that the IP address transmitted by the browser is made anonymous by shortening the IP address (by deleting the last octet of the IP address) before it is saved.
Data stored in cookies (section D) for the Matomo web analysis tool on the user’s terminal (“Matomo cookie data”).	Unique visitor ID to identify returning visitors, number of visits by the visitor, time of first visit, previous visits and current visit, start and expected end of current visit, visitor category to which a user belongs, source or campaign explaining how a user got to the website.	Users of the website.	Provision is not required by law or contract or required for the conclusion of a contract. There is no obligation to provide the data.	We do not store this data on our systems.  For the validity period of the cookie see section D.III

If the data is not provided, we cannot carry out a web analysis.

Data collected by the web analysis tool Matomo and stored in pseudonymous user profiles (“Matomo profile data”).

Data on the use of the website, in particular page impressions, frequency of visits, duration of visits to pages and approximate geographical origin of visitors.

Generated independently.

During the period of validity of the Matomo cookies (see section D.III) we store the Matomo profile data on our system. After expiration of the validity period of all cookies we delete the Matomo profile data.

## 2. Details on the processing of personal data

### Purpose of the processing of personal data

In order to improve the website and to better achieve the goals of the website (e.g. frequency of visits, increase of page views), the behaviour of users on our website is recorded and analysed in pseudonymised form. Users of the website are marked in pseudonymous form in order to recognize them on the website. Pseudonymous user profiles are created from this information. The pseudonymous user profiles are not combined with data about the bearer of the pseudonym. The aim of the procedure is to investigate where users come from, which areas of the website are visited and how often and for how long which subpages and categories are viewed.

For this purpose, cookies (section D) of the web analysis tool Matomo are used.

Categories of personal data to be processed	Automated decision making	Legal basis and, if applicable, legitimate interests	Recipient
Matomo HTTP data, Matomo data, Matomo profile data.	No automated decision making takes place.	Consent (Article 6(1)(a) of the General Data Protection Regulation)  If you have given your consent, you can revoke it at any time in Section B.VII.2 of this Privacy Policy.	Hosting-Provider

### 3. Details on the recipients of personal data and the transfer of personal data to third countries and/or international organisations

Recipient	Role of the recipient	Seat of the receiver	Adequacy decision or appropriate or appropriate safeguards for transfers to third countries and/or international organisations
Hosting-Provider	Contract processor	EU	-

### III. Use of online contact forms

On the website we offer you the possibility to contact us via contact forms. We process the information you provide in the contact forms to process your request.

Below will find more detailed information on this matter:

#### 1. Details of the personal data being processed

Categories of personal data to be processed	Personal data contained in the categories	Sources of data	Obligation to provide the data	Retention time
Protocol data that is technically generated when contact forms on the website are called using the Hypertext Transfer Protocol (Secure) (HTTP(S)) (“HTTP data”).	IP address, type and version of your Internet browser, operating system used, the page accessed, the previously visited page (referrer URL), date and time of access.	Users of the website.	Provision is not required by law or contract or required for the conclusion of a contract. There is no obligation to provide the data.  In the event that the data is not made available, we cannot	Data is stored in server log files in a form that allows identification of the persons concerned for a maximum period of 7 days, unless a security-relevant event occurs (e.g. a DDoS attack).  In the case of a security-relevant event, server log files are stored until the security-relevant event is eliminated and completely cleared up.

<p>Data that you provide us in contact forms on the website (“contact form data”).</p>	<p>This includes the information that you provide us in the respective contact form on the website. This can include the following data in particular: Title, first name, last name, company, address, e-mail address, telephone number, relevant service, relevant industry, relevant subject of your inquiry, subject of your inquiry, content of your inquiry, contents of attached documents.</p>	<p>Users of the website.</p>	<p>provide the content accessed on the website.</p>	<p>Data will be stored until your request is processed.</p>
			<p>Provision is not required by law or contract or required for the conclusion of a contract. There is no obligation to provide the data.</p>	<p>We also store this data for evidence purposes for the purpose of asserting, exercising or defending any legal claims for a transitional period of three years from the end of the year in which you provided us with the data and, in the event of any legal disputes, until they are terminated.</p>
			<p>If the data is not provided, we will not be able to process your request.</p>	<p>We also store this data to the extent required by law, in particular under commercial and tax law. Depending on the type of documents, commercial and tax retention obligations of six or ten years may exist (§ 147 Tax Code (AO), § 257 Commercial Code (HGB)).</p>

## 2 Details on the processing of personal data

Purpose of the processing of personal data	Categories of personal data to be processed	Automated decision making	Legal basis and, if applicable, legitimate interests	Recipient
<p>To provide our contact forms on the website, HTTP data is temporarily processed on our web server.</p>	<p>HTTP-Data.</p>	<p>No automated decision making takes place.</p>	<p>Balancing of interests (Article 6(1)(f) of the General Data Protection Regulation). Our legitimate interest is the provision of the contents of the website accessed by the user.</p>	<p>Hosting-Provider.</p>

Processing of your request.	Contact form data.	No automated decision making takes place.	As far as your request concerns a contract to which you are a party or the implementation of pre-contractual measures: Article 6(1)(f) of the General Data Protection Regulation.  Otherwise: Balancing of interests (Article 6(1)(f) of the General Data Protection Regulation). In this case, it is in our legitimate interest to process your request.	-
Storage and processing for evidence purposes for the possible assertion, exercise or defence of legal claims.	Contact form data.	No automated decision making takes place.	Balancing of interests (Article 6(1)(f) of the General Data Protection Regulation). Our legitimate interest is the assertion, exercise or defence of legal claims.	-
Storage of data for the fulfilment of legal, in particular commercial and tax law, storage obligations.	Contact form data.	No automated decision making takes place.	Fulfilment of a legal obligation (Article 6(1)(c) of the General Data Protection Regulation).	-
Depending on the type of documents, commercial and tax retention obligations of six or ten years may exist (§ 147 Tax Code (AO), § 257 Commercial Code (HGB)).	Contact form data.	No automated decision making takes place.	Fulfilment of a legal obligation (Article 6(1)(c) of the General Data Protection Regulation).	-

### 3. Details on the recipients of personal data and the transfer of personal data to third countries and/or international organisations

Recipient	Role of the recipient	Residence of the recipient	Adequacy decision or appropriate or appropriate safeguards for transfers to third countries and/or international organisations
Hosting-Provider	Contract processor	EU	-

#### IV. Use of online application forms

On the website we offer you the opportunity to contact us via online application forms. We process the information you provide in the application forms to carry out the application procedure.

Below you will find more detailed information on this matter:

##### 1. Details of the personal data being processed

Categories of personal data to be processed	Personal data contained in the categories	Sources of data	Obligation to provide the data	Retention time
Protocol data that is technically generated when contact forms on the website are called using the Hypertext Transfer Protocol (Secure) (HTTP(S)) (“HTTP data”).	IP address, type and version of your Internet browser, operating system used, the page accessed, the previously visited page (referrer URL), date and time of access.	Users of the website.	Provision is not required by law or contract or required for the conclusion of a contract. There is no obligation to provide the data.	Data is stored in server log files in a form that allows identification of the persons concerned for a maximum period of 7 days, unless a security-relevant event occurs (e.g. a DDoS attack).
Data that you provide us in online application forms on the website (“Application form data”).	This includes the information you provide us in the respective application form on the website. This can include the following data in particular: Title, first name, surname, company, address, gender, date of birth, nationality, e-mail address, telephone number, employment status, qualification, knowledge, driving licence class,	Users of the website.	The following data is required for the application procedure and the conclusion of an employment contract:	Data will be deleted after completion of the application process, unless there are legal, in particular labour, commercial and tax law, retention obligations.
			If this data is not provided, the application procedure	In the event of a successful application, the data is included in

forklift experience, desired position, desired location, desired working time, content of your message, contents of attached documents.

and the conclusion of an employment contract are not possible.

the personnel file and stored there according to the retention periods applicable to the personnel file.

## 2. Details on the processing of personal data

Purpose of the processing of personal data	Categories of personal data to be processed	Automated decision making	Legal basis and, if applicable, legitimate interests	Recipient
HTTP data is temporarily processed on our web server to provide our application forms on the website.	HTTP-Data.	No automated decision making takes place.	Balancing of interests (Article 6(1)(f) of the General Data Protection Regulation). Our legitimate interest is the provision of the contents of the website accessed by the user.  As far as your request concerns a contract to which you are a party or the implementation of pre-contractual measures: Article 6(1)(f) of the General Data Protection Regulation.	Hosting-Provider.
Carrying out the application procedure.	Application form data.	No automated decision making takes place.	Otherwise: Balancing of interests (Article 6(1)(f) of the General Data Protection Regulation). In this case, it is in our legitimate interest to process your request.	-
Storage and processing for evidence purposes for the possible assertion, exercise or defence of legal claims..	Contact form data.	No automated decision making takes place.	Balancing of interests (Article 6(1)(f) of the General Data Protection Regulation). Our legitimate interest is the assertion, exercise or defence of legal claims.	-
Storage of data for the fulfilment of legal, in particular commercial and tax law, storage obligations.	Contact form data.	No automated decision making takes place.	Fulfilment of a legal obligation (Article 6(1)(c) of the General Data Protection Regulation).	-
Depending on the type of documents, commercial and tax retention obligations of six or ten years				



may exist (§ 147 Tax Code (AO), § 257 Commercial Code (HGB)).

### 3. Details on the recipients of personal data and the transfer of personal data to third countries and/or international organisations

<b>Recipient</b>	<b>Role of the recipient</b>	<b>Residence of the recipient</b>	<b>Adequacy decision or appropriate or appropriate safeguards for transfers to third countries and/or international organisations</b>
Hosting-Provider	Contract processor	EU	-

## D. Information about the use of cookies

We use cookies in connection with the website and the offers provided on the website. In this process we use the processing and storage functions of your terminal device's browser and collect information from the memory of your terminal device's browser.

Below you will find more detailed information on this matter.

### I. General information about cookies

Cookies are small text files containing information that can be placed on the user's device via the browser when visiting a website. When you reload the website from the same device, the cookie and the information it contains may be retrieved.

#### 1. First- and third-party cookies

Depending on the origin of a cookie, so-called first-party cookies and third party cookies can be distinguished:

<b>First-Party-Cookies</b>	Cookies that are set and accessed by the operator of the website as the controller or by a processor commissioned by him.
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**Third-Party-Cookies** Cookies that are set and accessed by other controllers than the website operator who do not act as contract processors on behalf of the website operator.

## 2. Transient and persistent cookies

Depending on the period of validity, so-called transient and persistent cookies can also be distinguished:

**Transient cookies (session cookies)** Cookies that are automatically deleted when you close your browser.

**Persistent cookies** Cookies that remain stored on your terminal device for a certain period of time after you close your browser.

## 3. Cookies without consent and requiring consent

Depending on their function and purpose, the use of certain cookies may require the user's consent. In this respect, cookies can be distinguished according to whether the user's consent is required for their use:

### **Cookies not requiring consent**

Cookies that are absolutely necessary for the provider of an information society service that has been expressly requested by the subscriber or user to be able to provide this service ("Cookies that are absolutely necessary").

Cookies whose sole purpose is to transmit a message via an electronic communications network.

### **Cookies requiring consents**

Cookies for all other purposes than those mentioned above.

## II. Management of the cookies used on this website

### 1. Granting consent to the use of cookies and management of cookies

If the use of certain cookies requires the user's consent, we will only use these cookies when you use the website if you have given your prior consent. Information on whether consent is required for the use of a cookie can be found in the information on cookies used on this website in section D.III. of this cookie information.

When you visit our website, we display a so-called “cookie banner”, in which you can declare your consent to the use of cookies on this website by pressing a button. By clicking the button provided for this purpose, you have the option of consenting to the use of the cookies described in detail in Section D.III. of this cookie information.

We also store your consent in the form of a cookie (“opt-in cookie”) on your terminal device in order to determine whether you have already given your consent the next time you visit the website. The opt-in cookie is valid for a limited period of 6 months.

If you have given your consent, you can revoke it at any time in Section B.VII.2 of this Privacy Policy.

Cookies that are absolutely necessary cannot be deactivated via the cookie management function of this website. However, you can deactivate these cookies in your browser at any time.

## 2. Management of cookies via browser settings

You can also manage the use of cookies in your browser settings. Different browsers offer different ways to configure the cookie settings in the browser. Further detailed information can be found, for example, at <http://www.allaboutcookies.org/ge/cookies-verwalten/>.

However, we would like to point out that some functions of the website may not function or no longer function properly if you generally deactivate cookies in your browser.

## III Cookies used on this website

The following cookies may be used on this website:

Designation	First Party / Third Party	Purpose and content	Period of validity	Need for consent
<b>Opt-In-Cookies</b>				
Opt-In-Cookie	First Party	An absolutely necessary cookie to store your consent and, if necessary, your individual selection for the use of cookies on your end device in order to determine whether you have already given your consent the next time you visit the website.	Persistent: 6 months.	No.

## Matomo-Cookies

PIWIK_SESSID	First Party	Use of the web analysis tool Google Matomo to record and analyse the usage behaviour on our website in order to improve the website (section C of this Privacy Policy).	Transient.	Yes.
pk_id.1.7f74	First Party	Use of the web analysis tool Google Matomo to record and analyse the usage behaviour on our website in order to improve the website (section C of this Privacy Policy). The cookie contains a unique visitor ID to identify returning visitors.	Persistent: 13 months	Yes.
pk_ses.1.7f74	First Party	Use of the web analysis tool Google Matomo to record and analyse the usage behaviour on our website in order to improve the website (section C of this Privacy Policy).  This cookie assigns the user's visits to a session. Calls made after the cookie has expired are assigned to a new session.	Persistent: 30 minutes.	Yes.

## E. Analysis tools and advertising

### Google Analytics

This website uses functions of the web analysis service Google Analytics. The provider is Google Inc, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

Google Analytics uses so-called "cookies". These are text files that are stored on your computer and enable an analysis of your use of the website. The information generated by the cookie about your use of this website is usually transferred to a Google server in the USA and stored there.

Google Analytics cookies are stored on the basis of Art. 6 para. 1 lit. f GDPR. The website operator has a legitimate interest in analysing user behaviour in order to optimise both his website and his advertising.

## **IP Anonymisation**

We have activated the IP anonymisation function on this website. This will cause your IP address to be cut by Google within Member States of the European Union or in other countries party to the Agreement on the European Economic Area before being transmitted to the USA. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened 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 the website operator with other services relating to website and Internet use. The IP address transmitted by your browser in the context of Google Analytics is not merged with other Google data.

## **Browser Plug-in**

You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. You can also prevent Google from collecting the data generated by the cookie and relating to your use of the website (including your IP address) and from processing this data by Google by downloading and installing the browser plug-in available under the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>.

## **Objection to data collection**

You can prevent Google Analytics from collecting your data by clicking on the following link. An opt-out cookie is set which prevents the collection of your data on future visits to this website: [Google Analytics Opt Out](#)

More information on how Google Analytics handles user data can be found in Google's privacy policy: <https://support.google.com/analytics/answer/6004245?hl=en>.

## **Contract data processing**

We have concluded a contract with Google for contract data processing and fully implement the strict requirements of the German data protection authorities for the use of Google Analytics.

## **Demographic features on Google Analytics**

This website uses the "demographic features" function of Google Analytics. This allows reports to be created that contain information on the age, gender and interests of site visitors. This data comes from interest-related advertising by Google and from visitor data from third-party providers. This data cannot be



assigned to a specific person. You can disable this feature at any time via the ad settings in your Google Account or generally prohibit Google Analytics from collecting your information as described in the section “Objection to Data Collection”.

## Facebook Pixel

Our website uses the visitor action pixel of Facebook, Facebook Inc, 1601 S. California Ave, Palo Alto, CA 94304, USA (“Facebook”) for conversion measurement.

This enables visitors to be tracked after they have been redirected to the provider’s website by clicking on a Facebook ad. This allows the effectiveness of Facebook advertisements to be evaluated for statistical and market research purposes and future advertising measures to be optimised.

The collected data is anonymous for 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 can use the data for its own advertising purposes in accordance with the [Facebook Data Usage Guidelines](#). This allows Facebook to serve ads on Facebook pages and outside of Facebook. This use of the data cannot be influenced by us as the site operator.

Please see Facebook’s privacy policy for more information on how we protect your privacy: <https://www.facebook.com/about/privacy/>.

You can also disable the remarketing feature “Custom Audiences” in the Ad Settings section at [https://www.facebook.com/ads/preferences/?entry\\_product=ad\\_settings\\_screen](https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen). You must be logged in to Facebook for this purpose.

If you do not have a Facebook account, you can disable Facebook usage-based advertising on the European Interactive Digital Advertising Alliance website: <http://www.youronlinechoices.com/uk/your-ad-choices>.

## Objection to data collection

You can prevent Facebook from collecting your information by clicking on the following link. An opt-out cookie is set which prevents the collection of your data on future visits to this website: [Facebook Opt Out](#).

This opt-out cookie can only protect you from data transfer to Facebook on this website and in your browser. If you access another website, change your browser or delete the cookies in your browser, the opt-out cookie and the associated protection against transmissions is no longer active.

## F. Status and changes of this Privacy Policy

This Privacy Policy is valid as of 16 July 2018.

Due to technical developments and/or changes in legal and/or official requirements, it may be necessary to adapt this Privacy Policy.

The latest Privacy Policy can be called up at any time at <https://www.tkmgroup.com/en/privacy-policy>.