

Privacy Notice

1. Introduction

We would like to use the information below to provide you "data subject" with an overview of our processing of your personal data and your rights under data protection law. It is generally possible to use our website without entering personal data. However, if you wish to make use of special services offered by our company through our website, it may be necessary to process personal data. If it is necessary to process personal data and there is no legal basis for such processing, we will generally obtain your consent.

Personal data, such as your name, address or email address, is always processed in accordance with the EU General Data Protection Regulation (GDPR) and in accordance with the country-specific data protection regulations applicable to the "PRIMES GmbH". The aim of this Privacy Notice is to inform you about the scope and purpose of the personal data we collect, use and process.

As the data controller, we have implemented numerous technical and organisational measures to ensure the most complete possible protection of the personal data processed via this website. Nevertheless, Internet-based data transmissions can in principle have security gaps so that absolute protection cannot be guaranteed. For this reason, you are free to submit personal data on alternative ways, such as by phone or by post to us.

2. Data controller

The data controller, as defined by the GDPR, is:

PRIMES GmbH
Max-Planck-Straße 2
Telefon: 06157/ 9878-0
Telefax: 06157-9878-128
E-Mail: info@primes.de
www.primes.de

Data controller's representative: Dr.-Ing. Reinhard Kramer, Dr. rer. nat. Thomas Umschlag
<https://www.primes.de/en/legal-details.html>

3. Data protection officer

You can reach the data protection officer as follows:

MOOG & Partner Steuerberatungsgesellschaft mbH
Dr. Jan Moritz Schilling

You can reach our data protection officer at datenschutzbeauftragter@primes.de or our postal address with the addition "The data protection officer".

4. Definitions

This Privacy Notice is based on the terminology used by the European legislature and legislature in the adoption of the General Data Protection Regulation (GDPR). Our privacy policy should be easy to read and understand, both for the public and for our customers and business partners. To ensure this, we would like to explain in advance the terminology used. Among other things, we use the following terms in this privacy policy.

We use the following terms in this Privacy Notice, among others:

1. Personal data

Personal data means any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular 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.

2. Data subject

A data subject is any identified or identifiable natural person whose personal data is processed by the data controller (our company).

3. 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, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

4. Restriction to processing

Restriction to processing means marking stored personal data with the aim of limiting its processing in future.

5. Profiling

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 analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

6. Pseudonymisation

Pseudonymisation is the processing of personal data in such a way that the data can no longer be assigned to a specific data subject without additional information being provided, given that such additional information is kept separate and subject to appropriate technical and organisational measures that ensure that personal data cannot be attributed to an identified or identifiable natural person.

7. Data processor

The processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

8. Recipient

Recipient means a natural or legal person, public authority, agency or another body, to which the 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.

9. Third parties

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 authorised to process personal data.

10. Consent

Consent is 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.

5. Legal basis for processing

Article 6 Paragraph 1(a) GDPR serves as our company's legal basis for processing operations in which we obtain consent for a specific processing purpose.

If the processing of personal data is necessary for the performance of a contract to which you are a party, as is the case, for example, with processing operations that are necessary for the delivery of goods or the provision of other services or consideration, processing is based on Article 6 Paragraph 1(b) GDPR. The same applies to those processing operations required to carry out pre-contractual measures, such as in cases of queries regarding our products or services.

If our company is subject to a legal obligation requiring the processing of personal data, such as for the fulfilment of tax obligations, processing is based on Article 6 Paragraph 1(c) GDPR.

In rare cases, processing of personal data may be necessary to protect the vital interests of the data subject or of another natural person. This would be the case, for example, if someone visiting our business were to be injured and their name, age, health insurance data or other vital information needed to be disclosed to a doctor, hospital or other third party. Processing would then be based on Article 6 Paragraph 1(d) GDPR.

Finally, processing operations could be based on Article 6 Paragraph 1(f) GDPR. Processing operations not based on any of the above-mentioned legal bases may be carried out on the basis of Article 6 Paragraph 1(f) GDPR if processing is necessary to safeguard the legitimate interests of our company or those of a third party, provided the interests and fundamental rights and freedoms of the data subject do not take precedence. We are permitted to engage in such processing operations in particular because they have been specifically mentioned in European law. In this respect, the legislature took the view that a legitimate interest could be assumed if you are a customer of our company (Recital 47 Sentence 2 GDPR).

6. Technology

6.1 SSL/TLS encryption

This site uses SSL or TLS encryption to ensure the security of data processing and to protect the transmission of confidential content, such as orders, login details or contact requests that you send to us as the website operator. You can recognise an encrypted connection by your browser's address bar reading

"https://" instead of "http://" and the lock symbol in the browser bar.

We use this technology to protect your transmitted data.

6.2 Data collection when visiting the website

If you only use our website for informational purposes, i.e. if you do not register or otherwise provide us with information, we only collect the data your browser sends our server (in what is known as "server log files"). Our website collects a range of general data and information each time you access a website or an automated system. This general data and information is stored in the server's log files. It may be collected

1. the browser types and versions used,
2. the operating system used by the accessing system,
3. the website from which an accessing system accesses our website (called a referrer),
4. the sub-pages accessed via an accessing system on our website,
5. the date and time the website is accessed,
6. an internet protocol address (IP address) and
7. the accessing system's internet service provider.

No conclusions are drawn about you when using this general data and information. Instead, this information is needed to

1. properly deliver our website content,
2. to optimise the content of the website as well as to advertise it,
3. to ensure the continued functioning of our information technology systems and our website's technology as well as to
4. provide the information necessary for law enforcement authorities to prosecute in the event of a cyber-attack.

This collected data and information is therefore statistically analysed and further analysed by us with the aim of increasing data protection and data security within our company to ultimately ensure an optimum level of protection for the personal data being processed by us. The data from the server log files is stored separately from all personal data provided by a data subject.

The legal basis for data processing is Article 6 Paragraph 1 Sentence 1(f) GDPR. Our legitimate interest is based on the purposes listed above for the collection of data.

7. Cookies

7.1 General information about cookies

We use cookies on our website. Cookies are small files that are automatically created by your browser and stored on your IT system (laptop, tablet, smartphone, etc.) when you visit our website.

Information generated from the specific device used is stored in cookies. This does not mean, however, that we will gain immediate knowledge of your identity.

The use of cookies helps us make it more convenient for you to use our website. For example, we use

session cookies to detect whether you have already visited individual pages on our website. These are erased automatically when you leave our website.

We also use temporary cookies to optimise user-friendliness. These cookies are stored on your device for a specific period of time. If you return to our website to use our services, cookies allow us to automatically recognise that you have visited our website previously and remember the inputs and settings you have made so that you do not have to enter them again.

We also use cookies to statistically record the use of our website and analyse it for the purpose of optimising our services. These cookies allow us to automatically recognise that you have already visited our website when you visit our website again. These cookies are automatically erased after a defined period of time.

7.2 Legal basis for the use of cookies

The data processed by cookies, which are required for the proper functioning of the website, are to safeguard our legitimate interests pursuant to Article 6 Paragraph 1 Sentence 1(f) GDPR.

For all other cookies you have given your consent to this through our opt-in cookie banner in accordance with Article 6 Paragraph 1(a) GDPR.

8. Contents of our website

8.1 Contact/contact form

Personal data is collected when you contact us (e.g. using our contact form or by email). If you use a contact form to get in touch with us, the contact form you use will indicate the data being collected. This data is stored and used exclusively for the purpose of responding to your query or establishing contact and the associated technical administration. The legal basis for data processing is our legitimate interest in responding to your request pursuant to Article 6 Paragraph 1(f) GDPR. If the aim of you contacting us is to conclude a contract, processing is also legally based on Article 6 Paragraph 1(b) GDPR. Your data will be erased once we have finished processing your query. This is the case when it can be inferred from the circumstances that the relevant facts have been clarified in a conclusive manner and there are no statutory retention obligations in place that prevent its erasure.

8.2 Application management/job exchange

We collect and process the personal data of applicants for the purpose of carrying out the application process. Processing may also be carried out electronically. This is particularly the case if an applicant submits corresponding application documents to us electronically, for example by email or via a web form on the website. If we conclude an employment contract with an applicant, the data transmitted will be stored for the purpose of processing the employment relationship in compliance with the statutory provisions. If we do not conclude an employment contract with the applicant, the application documents will be automatically erased six (6) months after notification of the rejection decision, provided that no other legitimate interests of ours prevent their erasure. Other legitimate interests in this context include, for example, the duty to provide evidence in proceedings under the German Equal Treatment Act (Allgemeines Gleichbehandlungsgesetz [AGG]).

Legal basis for the processing of the data is Article 88 GDPR, § 26 I BDSG.

9. Newsletters

9.1 Newsletter for regular customers

If you have provided us with your email address when purchasing goods or services, we reserve the right to send you regular emails with offers on products or services from our collection similar to those you have already purchased. We do not require your specific consent for such purposes as per article 7, paragraph 3 of the UWG (Unfair Competition Act). The sole basis for the data processing is our legitimate interest in personalised direct marketing in line with article 6, paragraph 1 lit. f GDPR. We will not send you any emails should you expressly object to the use of your email address for that purpose. You are entitled to object to the use of your email address for the aforementioned purpose at any time with immediate effect by notifying the data controllers listed in the opening of this statement. By taking this action, you will incur submission fees only in line with basic rates. After receipt of your objection, your email address will immediately be removed for marketing purposes.

9.2 CleverReach

This website uses CleverReach to send newsletters. The provider is CleverReach GmbH & Co. KG, Mühlenstr. 43, 26180 Rastede. CleverReach is a service which enables the management and analysis of newsletters. The data you have provided for the newsletter (e.g. email address) are saved on CleverReach servers in Germany and/or Ireland.

We can analyse the behaviour of newsletter recipients by sending newsletters through CleverReach. Examples of analyses include determining how many recipients have opened the newsletter email and how often they have clicked on certain links contained within the newsletter. Conversion Tracking can also be used to analyse if clicking on the link led to a pre-determined action (e.g. if a product was purchased on our website). For further information on the analysis of data by the CleverReach newsletter, please visit: <https://www.cleverreach.com/en/features/reporting-tracking/>.

The legal basis for data processing is your consent (Article 6 Paragraph 1(a) GDPR). You can withdraw your consent at any time by unsubscribing from the newsletter. Withdrawal of consent does not affect the legality of data processing carried out previously.

If you do not want CleverReach to perform the data analysis, you must unsubscribe from the newsletter. We provide a link for this in each newsletter. You can also unsubscribe from the newsletter directly on our website.

The consent given by you can be withdrawn at any time. You can also prevent the processing at any time by unsubscribing from the newsletter. You can also prevent the storage of cookies by setting your web browser accordingly. Also, disabling JavaScript in your web browser or installing a JavaScript Blocker (such as <https://noscript.net> or <https://www.ghostery.com>) may prevent you from storing and transferring personal information. We point out that through these measures may no longer all the features of our website are available.

If you receive the newsletter as an existing customer (cf. Section 9.1), the data processing is based on Art. 6 (1) lit. f GDPR. In this case, the legitimate interest on our part lies in the safe and efficient organization of personalized direct advertising.

We will store your personal data which we retain for the purposes of sending the newsletter until you are removed from the newsletter service and they will be deleted from our servers and the CleverReach servers after you have unsubscribed from the newsletter. Data we retain for other purposes (e.g. email

addresses for the members' area) shall remain unaffected.

For further information, please refer to CleverReach's privacy policy at:
<https://www.cleverreach.com/en/privacy-policy/>.

10. Web analytics

10.1 Google Analytics

We use Google Analytics, a web analytics service provided by Google Ireland Limited (<https://www.google.com/about/>) (Gordon House, Barrow Street, Dublin 4, Ireland; hereinafter referred to as "Google"), on our website. As part of this, pseudonymised user profiles are created and cookies (see the section on "Cookies") are used. The information generated by the cookie about your use of this website, such as your browser

1. browser type/version,
2. operating system,
3. referrer URL (website previously visited), host,
4. name of the accessing computer (IP address) and,
5. time of server request,

is transmitted to a Google server in the US and stored there. This information is used to evaluate your use of this website, to compile reports on the website activities, and to perform further services linked to website and internet use for market research purposes and to tailor the design of this website. This information may also be sent to third parties if this is legally required or if third parties process this data on behalf of Google. Under no circumstances will your IP address be associated with any other data. IP addresses are anonymised so that it is not possible to assign them to individuals (known as IP masking).

Insofar as personal data is processed outside the EU or the European Economic Area (EEA) and there is no level of data protection corresponding to the European standard, the data transfer takes place under agreement of the EU standard contractual clauses, the purpose of which is to maintain an adequate level of data protection in the third country. The parent company of Google Ireland Limited, Google LLC, is based in California, USA. A transfer of data to the USA and access by US authorities to the data stored by Google cannot be ruled out. The USA is currently considered a third country from a data protection perspective. You do not have the same rights there as within the EU/EEA. You may not have any legal remedies against data access by the authorities there.

You may refuse the use of cookies by selecting the appropriate settings on your browser; however, we would point out that this may result in you not being able to use all the features of this website.

These processing operations only take place if express consent is granted in accordance with Article 6 Paragraph 1(a) GDPR.

You can also prevent the data generated by the cookie about your use of the website (including your IP address) from being sent to and processed by Google by downloading and installing the available browser add-on (<https://tools.google.com/dlpage/gaoptout?hl=en>).

Additional information on data protection with respect to Google Analytics is available on the Google Analytics website in the help section (<https://support.google.com/analytics/answer/6004245?hl=en>).

11. Your rights as a data subject

11.1 Right to confirmation

You have the right to request confirmation from us as to whether personal data relating to you will be processed.

11.2 Right to information (Article 15 GDPR)

You have the right to obtain information about the personal data stored about you at any time, free of charge, as well as the right to access a copy of such data from us, in accordance with the statutory provisions.

11.3 Right to rectification (Article 16 GDPR)

You have the right to request the immediate rectification of incorrect personal data relating to yourself. Furthermore, the data subject has the right to request the completion of incomplete personal data, taking into account the purposes of the processing.

11.4 Erasure (Article 17 GDPR)

You have the right to demand that we erase the personal data relating to you be deleted without delay, provided that one of the reasons provided by law applies and if processing or further storage is not required.

11.5 Restriction to processing (Article 18 GDPR)

You have the right to request that we restrict the processing of your data if one of the legal requirements is met.

11.6 Data transferability (Article 20 GDPR)

You have the right obtain personal data relating to you that you provided us in a structured, commonly used and machine-readable format. You also have the right to transfer this data to another controller without hindrance by us, to whom the personal data was provided, provided that the processing is based on the consent pursuant to Article 6 Paragraph 1(a) GDPR or Article 9 Paragraph 2(a) GDPR or on a contract pursuant to Article 6 Paragraph 1(b) GDPR, and the data are processed using automated procedures, unless processing is necessary to complete a task, is in the public interest or is carried out in the exercise of an official authority assigned to us.

Furthermore, when exercising your right to data transferability pursuant to Article 20 Paragraph 1 GDPR, you have the right to have personal data transferred directly from one controller to another, provided this is technically feasible and does not impede the rights and freedoms of other persons.

11.7 Objection (Article 21 GDPR)

You have the right to lodge an objection to the processing of personal data relating to you for reasons relating to your particular situation where this is done on the basis of Article 6 Paragraph 1(e) (data processing in the public interest) or (f) (data processing on the basis of the weighing of legitimate interests) GDPR.

This also applies to profiling based on these provisions pursuant to Article 4 Number 4 GDPR.

Should you lodge an objection, we will no longer process your personal data unless we can demonstrate compelling and legitimate reasons for such processing that outweigh your interests, rights and freedoms, or where processing serves the assertion, exercise or defence of legal claims.

In individual cases, we process your personal data for direct marketing purposes. You have the right to object at any time to the processing of personal data for the purpose of such advertising. This also applies to profiling where this is connected to this kind of direct marketing. Should you object to the processing of your data for direct marketing purposes, we will no longer process your personal data for this purpose.

In addition, you have the right to object to our processing of your personal data for scientific or historical research purposes or for statistical purposes pursuant to Article 89 Paragraph 1 GDPR for reasons arising from your particular situation, unless such processing is necessary for the performance of a task in the public interest.

You are free to exercise your right to lodge an objection in relation to the use of information society services, Directive 2002/58/EC notwithstanding, by means of automated procedures using technical specifications.

11.8 Revocation of consent regarding data protection

You have the right to revoke any consent to the processing of personal data at any time with future effect.

11.9 Lodging a complaint with a supervisory authority

You have the right to complain to a supervisory authority responsible for data protection about our processing of personal data.

12. Routine storage, erasure and blocking of personal data

We process and store your personal data only for the period of time necessary to meet the storage purpose or as required by the legal provisions to which our company is subject.

If the storage purpose no longer applies or if a required retention period expires, personal data will be routinely blocked or erased in accordance with the statutory provisions.

13. Duration of storage of personal data

The criterion for the duration of the retention of personal data is the respective legal retention period. Once this period expires, the data in question will be routinely erased, provided it is no longer required for the fulfilment or initiation of the contract.

(Status: May 2023)