

# BGP Privacy Policy

This Privacy Policy clarifies the nature, scope and purpose of the processing of personal data (following shortly referred to as "Data") in the course of the provision of our services, as well as our online services and related websites, features and content and external online presence, such as web sites. our Social Media Profile (collectively referred to as the "Online Offering"). With regard to the terminology used, e.g. "Processing" or "Responsible", we refer to the definitions in Article 4 of the General Data Protection Regulation (GDPR).

## Responsible

BGP-Blazevic Geradlinige Präzisionstechnik  
Stipo (Stephan) Blazevic  
Auerbacher Str. 8  
93057 Regensburg

Tel. +49 (0) 941 463 704-0  
Fax +49 (0) 941 463 704-50  
info@bgp-blazevic.de

## Types of processed data

- Inventory data (e.g., person master data, name or address).
- contact information (e.g. e-mail, phone numbers).
- content data (e.g. text input, photographs, videos).
- usage data (e.g. websites visited, interest in content, access times).
- Meta / communication data (e.g. device information, IP addresses).

## Categories of affected persons

Visitors and users of the online offer (following we refer to the affected persons as "users").

## Purpose of processing

- Provision of the online offer, its functions and contents.
- Answering contact requests and communicating with users.
- Safety measures.
- Reach Measurement / Marketing

## Used terms

"Personal data" means any information relating to an identified or identifiable natural person (following as the "data subject"); a natural person is considered as identifiable, which can be identified directly or indirectly, in particular by means of assignment to an identifier such as a name, to an identification number, to location data, to an online identifier (e.g. cookie) or to one or more special features, that express the physical, physiological, genetic, mental, economic, cultural or social identity of this natural person.

"Processing" means any process performed with or without the aid of automated procedures or any such process associated with personal data. The term goes far and includes virtually every handling of data.

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

"Profiling" means any kind of automated processing of personal data which involves the use of such personal data to evaluate certain personal aspects relating to a natural person, in particular aspects relating to job performance, economic situation, health, personal to analyze or predict preferences, interests, reliability, behavior, whereabouts or relocation of that natural person.

"Responsible person" means the natural or legal person, public authority, body or body that decides, alone or in concert with others, on the purposes and means of processing personal data.

"Processor" means a natural or legal person, public authority, agency or other body that processes personal data on behalf of the controller.

### **Relevant legal bases**

In accordance with Art. 13 GDPR, we inform you about the legal basis of our data processing. For users within the scope of the General Data Protection Regulation (DSGVO), i. the EU and the EEC, unless the legal basis in the data protection declaration is mentioned:

The legal basis for obtaining consent is Article 6 (1) lit. a and Art. 7 GDPR;

The legal basis for the processing for the fulfillment of our services and the execution of contractual measures as well as the answer to inquiries is Art. 6 para. 1 lit. b DSGVO;

The legal basis for processing to fulfill our legal obligations is Art. 6 para. 1 lit. c DSGVO;

In the event that vital interests of the data subject or another natural person require the processing of personal data, Art. 6 para. 1 lit. d DSGVO as legal basis.

The legal basis for the processing required to perform a task in the public interest or in the exercise of official authority which has been delegated to the controller is Article 6 (1) lit. e DSGVO.

The legal basis for processing in order to safeguard our legitimate interests is Article 6 (1) lit. f DSGVO.

The processing of data for purposes other than those to which they have been granted is governed by the provisions of Article 6 (4) GDPR.

The processing of special categories of data (according to Art. 9 (1) GDPR) is governed by the provisions of Art. 9 (2) GDPR.

### **Safety measures**

We will take appropriate technical and organizational measures in accordance with legal requirements, taking the state of the art into account, the implementation costs and the nature, scope, circumstances and purposes of the processing and the different likelihood and severity of the risk to the rights and freedoms of individuals to ensure a level of protection appropriate to the risk.

Measures include, in particular, ensuring the confidentiality, integrity and availability of data by controlling physical access to the data, as well as their access, input, disclosure, availability and separation. We have also set up procedures to ensure the enjoyment of data subject rights, data deletion and data vulnerability. Furthermore, we consider the protection of personal data already in the development, or selection of hardware, software and procedures, according to the principle of data protection through technology design and privacy-friendly default settings.

### **Collaboration with contract processors, joint controllers and third parties**

If we disclose data to other persons and companies (contract processors, joint controllers or third parties) in the course of our processing, transmit them to them or otherwise grant them access to the data, this will only be done on the basis of a legal permission (e.g. if the data is transmitted to third parties, such as to payment service providers, to fulfill the contract), users have consented to a legal obligation to do so or on the basis of our legitimate interests (e.g. the use of agents, web hosts, etc.).

If we disclose data to other companies in our group, convey it or otherwise grant access to it, this is done in particular for administrative purposes as a legitimate interest and, moreover, based on a legal basis.

### **Transfers to third countries**

If we process data in a third country (i.e. outside the European Union (EU), the European Economic Area (EEA) or the Swiss Confederation) or in the context of the use of third party services or disclosure, or transfer of data to other persons or companies, this will only happen if it is to fulfill our (pre) contractual obligations, on the basis of your consent, on the basis of a legal obligation or on the basis of our legitimate interests. Subject to legal or contractual permissions, we process or leave the data in a third country only in the presence of legal requirements. That the processing is e.g. based on specific guarantees, such as the officially recognized level of data protection (for example, the US Privacy Shield) or compliance with officially recognized specific contractual obligations.

## **Rights of data subjects**

You have the right to ask for confirmation as to whether the data in question is being processed and for information about this data as well as for further information and copying of the data in accordance with legal requirements.

You have the legal requirements to demand the completion of the data concerning you or the correction of the incorrect data concerning you. In accordance with the statutory provisions, they have the right to demand that the relevant data be deleted immediately, or alternatively to demand a restriction of the processing of the data in accordance with the statutory provisions.

You have the right to request that the data relating to you provided to us be obtained in accordance with legal requirements and to request their transmission to other persons responsible. They also have the right, in accordance with the legal requirements, to submit a complaint to the competent supervisory authority.

## **Withdrawal**

You have the right to withdraw granted consent with effect for the future.

## **Right of objection**

You may object to the future processing of your data in accordance with legal requirements at any time. The objection may in particular be made against processing for direct marketing purposes.

## **Cookies and right to object in direct mail**

"Cookies" are small files that are stored on users' computers. Different information can be stored within the cookies. A cookie is primarily used to store the information about a user (or the device on which the cookie is stored) during or after his visit to an online offer. Temporary cookies, or "session cookies" or "transient cookies", are cookies that are deleted after a user leaves an online service and closes his browser. In such a cookie, e.g. the contents of a shopping cart in an online shop or a login status are saved. The term "permanent" or "persistent" refers to cookies that remain stored even after the browser has been closed. Thus, e.g. the login status will be saved if users visit it after several days. Likewise, in such a cookie the interests of the users can be stored, which are used for range measurement or marketing purposes. A "third-party cookie" refers to cookies that are offered by providers other than the person who manages the online offer (otherwise, if it is only their cookies, this is called "first-party cookies").

We can use temporary and permanent cookies and clarify this in the context of our privacy policy. If users do not want cookies stored on their computer, they will be asked to disable the option in their browser's system settings. Saved cookies can be deleted in the system settings of the browser. The exclusion of cookies can lead to functional restrictions of this online offer.

A general contradiction to the use of cookies used for online marketing purposes can be found in a variety of services, especially in the case of tracking, via the US website <http://www.aboutads.info/choices/> or the EU site <http://www.youronlinechoices.com/> be explained. Furthermore, the storage of cookies can be achieved by switching them off in the settings of the browser. Please note that not all features of this online offer may be used.

## **Deletion of data**

The data processed by us will be deleted or restricted in accordance with legal requirements. Unless explicitly stated in this privacy policy, the data stored by us are deleted as soon as they are no longer required for their purpose and the deletion does not conflict with any statutory storage requirements.

Unless the data is deleted because it is required for other and legitimate purposes, its processing will be restricted. That means that the data is blocked and not processed for other purposes. This applies, for example for data that must be kept for commercial or tax reasons.

## **Changes and updates to the privacy policy**

We ask you to inform yourself regularly about the content of our privacy policy. We will adjust the privacy policy as soon as the changes to the data processing require it. We will notify you as soon as the changes require your participation (e.g. consent) or other individual notification.

## **Business-related processing**

In addition we process

- Contract data (e.g., subject, term, customer category).
- Payment data (e.g., bank details, payment history)

from our customers, prospects and business partners for the purpose of providing contractual services, service and customer care, marketing, advertising and market research.

## **Contact**

When contacting us (for example, by contact form, e-mail, telephone or via social media) the information of the user to process the contact request and its processing in accordance with Art. 6 para. 1 lit. b. (in the context of contractual / pre-contractual relationships), Art. 6 para. 1 lit. f. (other requests) DSGVO processed .. User information can be stored in a customer relationship management system ("CRM System") or similar request organization.

We delete the requests, if they are no longer required. We check the necessity every two years; Furthermore, the legal archiving obligations apply.

## **Collection of access data and log files**

We, as well as our hosting provider, collect data on the basis of our legitimate interests within the meaning of Art. 6 para. 1 lit. f. DSGVO on every access to the server on which this service is located (so-called server log files). The access data includes name of the retrieved web page, file, date and time of retrieval, amount of data transferred, message about successful retrieval, browser type and version, the user's operating system, referrer URL (the previously visited page), IP address and the requesting provider.

Logfile information is stored for security purposes (e.g. to investigate abusive or fraudulent activities) for a maximum of 7 days and then deleted. Data whose further retention is required for evidential purposes shall be exempted from the cancellation until final clarification of the incident.

## **Google Analytics**

Based on our legitimate interests (i.e. interest in the analysis, optimization, and economic operation of our online offer within the meaning of Art. 6 (1) lit. DSGVO), Google Analytics uses a web analytics service provided by Google LLC ("Google"). Google uses cookies. The information generated by the cookie about the use of the online offer by the users are usually transmitted to a Google server in the USA and stored there.

Google is certified under the Privacy Shield Agreement, which provides a guarantee to comply with European privacy legislation ([https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI\[&\]status=Active](https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI[&]status=Active)).

Google will use this information on our behalf to evaluate the use of our online offer by users, to compile reports on the activities within this online offer and to provide us with further services related to the use of this online offer and the internet usage. In this case, pseudonymous usage profiles of the users can be created from the processed data.

We only use Google Analytics with activated IP anonymization. This means that the IP address of the users will be shortened by Google within member states of the European Union or in other contracting states of the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be sent to a Google server in the US and shortened there.

The IP address submitted by the user's browser will not be merged with other data provided by Google. Users can prevent the storage of cookies by setting their browser software accordingly; Users may also prevent the collection by Google of the data generated by the cookie and related to its use of the online offer and the processing of such data by Google by downloading and installing the browser plug-in available at the following link: <http://tools.google.com/dlpage/gaoptout?hl=en>.

For more information about Google's data usage, hiring and disparaging options, please read Google's Privacy Policy (<https://policies.google.com/privacy>) and Google's Ads Settings (<https://adssettings.google.com/authenticated>).

The personal data of users will be deleted or anonymized after 14 months.

## **Google Universal Analytics**

We use Google Analytics in the design as "Universal Analytics". "Universal Analytics" means a process of Google Analytics, in which the user analysis is based on a pseudonymous user ID and thus a pseudonymous profile of the user is created with information from the use of different devices (so-called "cross-device tracking").

## **Targeting with Google Analytics**

We use Google Analytics to display advertisements displayed within Google and its affiliate advertising services, only those users who have shown an interest in our online offering or who have certain characteristics (e.g. interests in specific topics or products visited by them) Web pages) that we submit to Google (so-called "remarketing" or "Google Analytics audiences"). With Remarketing Audiences, we also want to make sure that our ads meet the potential interest of users.

## **Google AdWords and conversion measurement**

We use the services of Google LLC, 1600 Amphitheater Parkway, Mountain View, CA 94043 on the basis of our legitimate interests (i.e. interest in the analysis, optimization and economic operation of our online service within the meaning of Art. 6 (1) lit. DSGVO) , USA, ("Google").

Google is certified under the Privacy Shield Agreement, which provides a guarantee to comply with European privacy legislation ([https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI\[&\]status=Active](https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI[&]status=Active)).

We use Google's online AdWords marketing tool "AdWords" to place ads on the Google advertising network (e.g., in search results, in videos, on websites, etc.) so that they are displayed to users who have a suspected interest in the ads. This allows us to more specifically display ads for and within our online offering so that we only present ads to users that potentially match their interests. If a user e.g. Showing ads for products he's been looking for on other online offers is called remarketing. For these purposes, upon access to our and other websites where the Google Advertising Network is active, Google will immediately execute a Google code and become so-called (re) marketing tags (invisible graphics or code, also known as "Web beacons") incorporated into the website. With their help, the user is provided with an individual cookie, i.a. small file is saved (instead of cookies, comparable technologies can also be used).

Furthermore, we receive an individual "conversion cookie". The information obtained through the cookie is used by Google to generate conversion statistics for us. However, we only hear the anonymous total number of users who clicked on our ad and were redirected to a conversion tracking tag page. However, we do not receive any information that personally identifies users.

The data of the users are pseudonym processed within the Google advertising network. That Google stores and processes e.g. not the name or e-mail address of the users, but processes the relevant data cookie-related within pseudonymous user profiles. That from the perspective of Google, the ads are not managed and displayed to a specifically identified person, but to the cookie owner, regardless of who that cookie owner is. This does not apply if a user has explicitly allowed Google to process the data without this pseudonymization. The information collected about users is transmitted to Google and stored on Google's servers in the United States.

For more information about Google's data usage, hiring and disparaging options, please read Google's Privacy Policy (<https://policies.google.com/technologies/ads>) and Google's Ads Settings (<https://adssettings.google.com/authenticated>).

## **Online presence in social media**

We maintain online presence within social networks and platforms in order to communicate with customers, prospects and users active there and to inform them about our services.

We point out that data of the users outside the area of the European Union can be processed. This may result in risks for the users because e.g. enforcement of user rights could be made more difficult. With respect to US providers certified under the Privacy Shield, we point out that they are committed to respecting EU privacy standards.

Furthermore, the data of the users are usually processed for market research and advertising purposes. Thus, e.g. user profiles are created from the user behavior and the resulting interests of the users. The usage profiles can in turn be used to e.g. place advertisements inside and outside the platforms that are allegedly in line with users' interests. For these purposes, cookies are usually stored on the computers of the users, in which the user behavior and the interests of the users are stored. Furthermore, in the usage profiles, data can also be stored

independently of the devices used by the users (in particular if the users are members of the respective platforms and logged in to them).

The processing of the personal data of users is based on our legitimate interests in an effective information of users and communication with users in accordance with Art. 6 para. 1 lit. f. DSGVO. If the users are asked for a consent to the above-described data processing by the respective providers of the platforms, the legal basis of the processing is Art. 6 para. 1 lit. a., Art. 7 GDPR.

For a detailed description of the respective processing and the possibilities of contradiction (opt-out), we refer to the following linked information of the provider.

Also in the case of requests for information and the assertion of user rights, we point out that these can be claimed most effectively from the providers. Only the providers have access to the data of the users and can directly take appropriate measures and provide information. If you still need help, then you can contact us.

- Facebook (Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Irland)

Based on the: "[Vereinbarung über gemeinsame Verarbeitung personenbezogener Daten](#)" - Data protection: <https://www.facebook.com/about/privacy/>, especially for sites: [https://www.facebook.com/legal/terms/information\\_about\\_page\\_insights\\_data](https://www.facebook.com/legal/terms/information_about_page_insights_data) , Opt-Out: <https://www.facebook.com/settings?tab=ads> und <http://www.youronlinechoices.com>, Privacy Shield: <https://www.privacyshield.gov/participant?id=a2zt00000000GnywAACJ&jstatus=Active>.

- Google/ YouTube (Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA) – Data protection: [nbsp]<https://policies.google.com/privacy>, Opt-Out: <https://adssettings.google.com/authenticated>, Privacy Shield: <https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&jstatus=Active>.

- Instagram (Instagram Inc., 1601 Willow Road, Menlo Park, CA, 94025, USA) – Data protection / Opt-Out: <http://instagram.com/about/legal/privacy/>.

- Twitter (Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA) - Data protection: <https://twitter.com/de/privacy>, Opt-Out: <https://twitter.com/personalization>, Privacy Shield: <https://www.privacyshield.gov/participant?id=a2zt00000000TORzAAOJ&jstatus=Active>.

- Pinterest (Pinterest Inc., 635 High Street, Palo Alto, CA, 94301, USA) – Datenschutzerklärung/ Opt-Out: <https://about.pinterest.com/de/privacy-policy>.

- LinkedIn (LinkedIn Ireland Unlimited Company Wilton Place, Dublin 2, Irland) - Data protection <https://www.linkedin.com/legal/privacy-policy> , Opt-Out: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>, Privacy Shield: <https://www.privacyshield.gov/participant?id=a2zt00000000L0UZAA0J&jstatus=Active>.

- Xing (XING AG, Dammtorstraße 29-32, 20354 Hamburg, Deutschland) - Data protection/ Opt-Out: <https://privacy.xing.com/de/datenschutzerklaerung>.

- Wakalet (Wakelet Limited, 76 Quay Street, Manchester, M3 4PR, United Kingdom) - Data protection/ Opt-Out: <https://wakelet.com/privacy.html>.

- Soundcloud (SoundCloud Limited, Rheinsberger Str. 76/77, 10115 Berlin, Deutschland) - Data protection/ Opt-Out: <https://soundcloud.com/pages/privacy>.

### **Integration of services and contents of third parties**

Based on our legitimate interests (i.e. interest in the analysis, optimization and economic operation of our online offer within the meaning of Art. 6 (1) lit. DSGVO), we make use of content or services offered by third-party providers in order to provide their content and services, such as include videos or fonts (collectively referred to as "content").

This always presupposes that the third-party providers of this content perceive the IP address of the users, since they could not send the content to their browser without the IP address. The IP address is therefore required for the presentation of this content. We endeavor to use only content whose respective providers use the IP address solely for the delivery of the content. Third parties may also use so-called pixel tags (invisible graphics, also referred to as "web beacons") for statistical or marketing purposes. The "pixel tags" can be used to evaluate information such as visitor traffic on the pages of this website. The pseudonymous information may also be stored

in cookies on the user's device and may include, but is not limited to, technical information about the browser and operating system, referring web pages, visit time, and other information regarding the use of our online offer.

### **Youtube**

We embed the videos on the YouTube platform of Google LLC, 1600 Amphitheater Parkway, Mountain View, CA 94043, USA. Data protection: <https://www.google.com/policies/privacy/>, Opt-Out: <https://adssettings.google.com/authenticated>.

### **Google Fonts**

We incorporate the fonts ("Google Fonts") provided by Google LLC, 1600 Amphitheater Parkway, Mountain View, CA 94043, USA. Data protection: <https://www.google.com/policies/privacy/>, Opt-Out: <https://adssettings.google.com/authenticated>.

### **Google ReCaptcha**

We bind the function to detect bots, e.g. when entering into online forms ("ReCaptcha") of the provider Google LLC, 1600 Amphitheater Parkway, Mountain View, CA 94043, USA. Data protection: <https://www.google.com/policies/privacy/>, Opt-Out: <https://adssettings.google.com/authenticated>.

### **Google Maps**

We include maps from the Google Maps service provided by Google LLC, 1600 Amphitheater Parkway, Mountain View, CA 94043, USA. The processed data may include, in particular, users' IP addresses and location data, but these are not collected without their consent (usually as part of the settings of their mobile devices). The data can be processed in the USA. Data protection: <https://www.google.com/policies/privacy/>, Opt-Out: <https://adssettings.google.com/authenticated>.

### **Twitter**

Within our online offering, features and content of the Twitter service offered by Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA, may be incorporated. For this, e.g. Content such as images, videos, or text and buttons that allow users to share content from this online offering within Twitter.

If the users are members of the platform Twitter, Twitter can call the o.g. Assign contents and functions to the profiles of the users there. Twitter is certified under the Privacy Shield Agreement, which provides a guarantee to comply with European privacy legislation

([https://www.privacyshield.gov/participant?id=a2zt0000000TORzAAO\[&\]status=Active](https://www.privacyshield.gov/participant?id=a2zt0000000TORzAAO[&]status=Active)). Data protection: <https://twitter.com/de/privacy>, Opt-Out: <https://twitter.com/personalization>.

### **Xing**

Within our online offer functions and contents of the service Xing, offered by XING AG, Dammtorstraße 29-32, 20354 Hamburg, Germany, can be integrated. For this, e.g. Content such as images, videos, or text and buttons that allow users to share content from this online offering within Xing. If the users are members of the platform Xing, Xing can call the o.g. Assign contents and functions to the profiles of the users there. Privacy Policy of Xing: <https://privacy.xing.com/de/datenschutzerklaerung>.

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