

## Privacy Statement from 24.01.2023

We are very pleased about your interest in our company!

The protection of your privacy when processing personal data is an important concern for us, which is why we would like to provide you with the following information on data protection.

### Handling personal data

The use of our website is possible without any indication of personal data. However, if a data subject wants to use special services of our enterprise via our website, processing of personal data could become necessary. If processing of personal data is necessary and if there is no legal basis for such processing, we will generally obtain the consent of the data subject.

The processing of personal data, such as the name, address, e-mail address, or telephone number of a data subject shall always be in line with the country-specific data protection regulations applicable to us. By means of this data protection declaration, our enterprise would like to inform the public about the type, scope and purpose of the personal data we collect, use and process. Furthermore, data subjects are informed of their rights by means of this data protection declaration.

As the controller, we have implemented numerous technical and organisational measures to ensure the most complete protection possible for the personal data processed via this website. Nevertheless, Internet-based data transmissions can always have security vulnerabilities, so that absolute protection cannot be guaranteed. For this reason, every data subject is free to transmit personal data to us by alternative means, for example by telephone.

### Definitions

The data protection declaration is based on the terms used by the European Directive and Ordinance Maker when enacting the General Data Protection Regulation (DSGVO). Our data protection declaration should be easy to read and understand for the public as well as for our customers and business partners.

To ensure this, we would like to explain the terms used in advance.

We use the following terms, among others, in this privacy policy:

(a) Personal data

Personal data means any information relating to an identified or identifiable natural person (hereinafter "data subject"). An identifiable natural person is one who can be identified, directly or indirectly, 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.

(b) Person concerned

Data subject means any identified or identifiable natural person whose personal data are processed by the controller.

c) Processing

Processing is any operation or set of operations which is performed upon personal data, whether or not by automatic means, such as collection, recording, organisation, filing, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

(d) Restriction of processing

Restriction of processing is the marking of stored personal data with the aim of limiting their future processing.

e) Profiling

Profiling is any form of automated processing of personal data which consists in using such personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects relating to that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or change of location.

f) Pseudonymisation

Pseudonymisation is the processing of personal data in such a way that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures which ensure that the personal data are not attributed to an identified or identifiable natural person.

(g) Controller or person responsible for processing

The controller or person responsible for processing is the natural or legal person, public authority, agency or other body which alone or jointly with others determines the purposes and means of the processing of personal data. Where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its designation may be provided for under Union or Member State law.

#### (h) Processors

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

#### i) Recipient

A recipient is a natural or legal person, public authority, agency or other body to whom personal data are disclosed, whether or not a third party. However, public authorities that may receive personal data in the context of a specific investigative task under Union or Member State law shall not be considered as recipients.

#### j) Third

Third party means a natural or legal person, public authority, agency or other body other than the data subject, the controller, the processor and the persons authorised to process the personal data under the direct responsibility of the controller or the processor.

#### k) Consent

Consent shall mean any freely given specific and informed indication of the data subject's wishes in the form of a statement or other unambiguous affirmative act by which the data subject signifies his or her agreement to the processing of personal data relating to him or her.

## Name and address of the controller

The responsible party within the meaning of the General Data Protection Regulation (GDPR), other data protection laws applicable in the Member States of the European Union and other provisions of a data protection nature is:

Karl Reder Consulting e.U.  
Mag. Karl Reder  
Baumgartner Straße 8/2  
3512 Mautern  
Austria  
office@reder.at

## Collection of general data and information

The website collects a series of general data and information with each call-up of the website by a data subject or an automated system. This general data and information is stored in the server's log files. The following data 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 (so-called referrer), (4) the sub-websites which are accessed via an accessing system on our website, (5) the date and time of access to the website, (6) an Internet protocol address (IP address), (7) the Internet service provider of the accessing system and (8) other similar data and information that serve to avert danger in the event of attacks on our information technology systems.

When using these general data and information, we do not draw any conclusions about the data subject. This information is rather required in order to (1) correctly deliver the contents of our website, (2) optimise the contents of our website as well as the advertising for these, (3) ensure the permanent operability of our information technology systems and the technology of our website as well as (4) to provide law enforcement authorities with the information necessary for prosecution in the event of a cyber attack. Therefore, the data and information collected anonymously is, on the one hand, evaluated statistically

and is further evaluated with the aim of increasing the data protection and data security of our enterprise, and ultimately ensuring an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from any personal data provided by a data subject.

The controller shall provide any data subject at any time, upon request, with information on which personal data relating to the data subject are stored. Furthermore, the controller shall correct or delete personal data at the request or indication of the data subject, provided that this does not conflict with any statutory retention obligations. The entire staff of the controller shall be available to the data subject as contact persons in this context.

### Contact option via the website

Due to legal provisions, the website contains data that enable a quick electronic contact to our enterprise, as well as direct communication with us, which also includes a general address of the so-called electronic mail (e-mail address). If a data subject contacts the controller by e-mail or by using a contact form, the personal data transmitted by the data subject will be stored automatically. Such personal data transmitted on a voluntary basis by a data subject to the controller will be stored for the purposes of processing or contacting the data subject. This personal data will not be disclosed to third parties.

### Routine deletion and blocking of personal data

The controller shall process and store personal data of the data subject only for the time necessary to achieve the purpose of storage or where provided for by the European Directive and Regulation or other legislator in laws or regulations to which the controller is subject.

If the purpose of storage no longer applies or if a storage period prescribed by the European Directive and Regulation or another competent legislator expires, the personal data will be routinely blocked or deleted in accordance with the statutory provisions.

## Rights of the data subject

### a) Right to confirmation

Every data subject shall have the right, granted by the European Directive and the Regulation, to obtain confirmation from the controller as to whether personal data concerning him or her are being processed. If a data subject wishes to exercise this right, he or she may, at any time, contact any employee of the controller.

### b) Right to information

Any person concerned by the processing of personal data has the right, granted by the European Directive and Regulation, to obtain from the controller, at any time and free of charge, information about the personal data stored about him or her and a copy of that information. Furthermore, the European Directive and Regulation has granted the data subject access to the following information:

- the processing purposes
- the categories of personal data that are processed
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular in the case of recipients in third countries or international organisations
- if possible, the planned duration for which the personal data will be stored or, if this is not possible, the criteria for determining this duration
- the existence of a right to obtain the rectification or erasure of personal data concerning them or to obtain the restriction of processing by the controller or a right to object to such processing
- the existence of a right of appeal to a supervisory authority
- if the personal data is not collected from the data subject:
- All available information on the origin of the data
- the existence of automated decision-making, including profiling, pursuant to Art. 22(1) and (4) of the GDPR and - at least in these cases - meaningful information about the logic involved and the scope and intended effects of such processing for the data subject

Furthermore, the data subject has the right to be informed whether personal data have been transferred to a third country or to an international organisation. If this is the case, the data subject also has the right to obtain information on the appropriate safeguards in connection with the transfer. If a data subject wishes to exercise this right of access, he or she may contact an employee of the controller at any time.

### c) Right of rectification

Any person concerned by the processing of personal data shall have the right granted by the European Directive and the Regulation to obtain the rectification without delay of inaccurate personal data relating to him or her. Furthermore, the data subject has the right to request the completion of incomplete personal data, including by means of a supplementary declaration, taking into account the purposes of the processing. If a data subject wishes to exercise this right of rectification, he or she may, at any time, contact any employee of the controller.

#### d) Right to erasure (right to be forgotten)

Any person concerned by the processing of personal data shall have the right, granted by the European Directive and the Regulation, to obtain from the controller the erasure without delay of personal data concerning him or her, where one of the following grounds applies and insofar as the processing is not necessary:

- The personal data were collected or otherwise processed for purposes for which they are no longer necessary.
- The data subject revokes his/her consent on which the processing was based pursuant to Art. 6(1)(a) DSGVO or Art. 9(2)(a) DSGVO and there is no other legal basis for the processing.
- The data subject objects to the processing pursuant to Art. 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Art. 21(2) of the GDPR.
- The personal data have been processed unlawfully.
- The deletion of the personal data is necessary for compliance with a legal obligation under Union or Member State law to which the controller is subject.
- The personal data was collected in relation to information society services offered pursuant to Art. 8(1) DSGVO.

If one of the aforementioned reasons applies, and a data subject wishes to arrange for the deletion of personal data stored, he or she may, at any time, contact any employee of the controller. The employee will arrange for the deletion request to be complied with immediately. If the personal data have been made public and our company as the controller is obliged to erase the personal data pursuant to Art. 17 (1) of the Data Protection Regulation, we shall implement reasonable measures, including technical measures, taking into account the available technology and the cost of implementation, in order to inform other data controllers which process the published personal data that the data subject has requested from those other data controllers to erase all links to or copies or replications of the personal data, unless the processing is necessary. The employee will arrange the necessary in individual cases.

#### e) Right to restriction of processing

Any person concerned by the processing of personal data has the right, granted by the European Directive and the Regulation, to obtain from the controller the restriction of processing where one of the following conditions is met:

- The accuracy of the personal data is contested by the data subject for a period enabling the controller to verify the accuracy of the personal data.
- The processing is unlawful, the data subject objects to the erasure of the personal data and requests instead the restriction of the use of the personal data.
- The controller no longer needs the personal data for the purposes of processing, but the data subject needs it for the establishment, exercise or defence of legal claims.
- The data subject has objected to the processing pursuant to Art. 21(1) of the GDPR and it is not yet clear whether the legitimate grounds of the controller override those of the data subject.

If one of the aforementioned conditions is met, and a data subject wishes to request the restriction of personal data stored, he or she may, at any time, contact any employee of the controller. The employee will arrange the restriction of the processing.

#### f) Right to data portability

Every person affected by the processing of personal data has the right granted by the European Directive and Regulation to receive the personal data concerning him or her, which have been provided by the data subject to a controller, in a structured, commonly used and machine-readable format. The data

subject shall also have the right to transmit such data to another controller without hindrance from the controller to whom the personal data have been provided, provided that the processing is based on consent pursuant to Art. 6(1)(a) of the GDPR or Art. 9(2)(a) of the GDPR or on a contract pursuant to Art. 6(1)(b) of the GDPR and the processing is carried out by automated means, unless the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. Furthermore, when exercising the right to data portability pursuant to Art. 20(1) of the GDPR, the data subject shall have the right to obtain the direct transfer of personal data from one controller to another controller where technically feasible and provided that this does not adversely affect the rights and freedoms of other persons. To assert the right to data portability, the data subject may contact us at any time.

g) Right of objection

Any person affected by the processing of personal data shall have the right granted by the European Directive and Regulation to object at any time, on grounds relating to his or her particular situation, to the processing of personal data concerning him or her which is carried out on the basis of Art. 6(1)(e) or (f) DSGVO. This also applies to profiling based on these provisions. We shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the assertion, exercise or defence of legal claims. If we process personal data for the purpose of direct marketing, the data subject shall have the right to object at any time to processing of personal data processed for such marketing. This also applies to profiling insofar as it is related to such direct marketing. If the data subject objects to the processing for direct marketing purposes, we will no longer process the personal data for these purposes. In addition, the data subject has the right, on grounds relating to his or her particular situation, to object to processing of personal data concerning him or her for scientific or historical research purposes, or for statistical purposes pursuant to Art. 89(1) of the Data Protection Regulation, unless such processing is necessary for the performance of a task carried out in the public interest. In order to exercise the right to object, the data subject may directly contact any employee. The data subject is also free to exercise his or her right to object by means of automated procedures using technical specifications in the context of the use of information society services, notwithstanding Directive 2002/58/EC.

#### h) Automated decisions in individual cases including profiling

Any person concerned by the processing of personal data shall have the right, granted by the European Directive and the Regulation, not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her, where the decision is

1. is not necessary for the conclusion or performance of a contract between the data subject and the controller, or
2. is authorised by Union or Member State legislation to which the controller is subject and that legislation contains appropriate measures to safeguard the rights and freedoms and legitimate interests of the data subject; or
3. takes place with the express consent of the data subject.

If the decision (1) is necessary for entering into, or the performance of, a contract between the data subject and the controller, or (2) it is made with the data subject's explicit consent, we shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, which include at least the right to obtain the data subject's involvement on the part of the controller, to express his or her point of view and to contest the decision. If the data subject wishes to exercise the rights concerning automated decisions, he or she may, at any time, contact any employee of the controller.

#### i) Right to revoke consent under data protection law

Every person affected by the processing of personal data has the right granted by the European Directive and Regulation to withdraw consent to the processing of personal data at any time. If the data subject wishes to exercise the right to withdraw consent, he or she may, at any time, contact any employee of the controller.

### Legal basis of the processing

Art. 6 (1) lit. a DSGVO serves our company as the 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 the data subject is a party, as is the case, for example, with processing operations that are necessary for the delivery of goods or the provision of another service or consideration, the processing is based on Art. 6 (1) (b) of the GDPR. The same applies to such processing operations that are necessary for the implementation of pre-contractual measures, for example in the case of enquiries about our products or services. If our company is subject to a legal obligation by which the processing of personal data becomes necessary, such as for the fulfilment of tax obligations, the processing is based on Art. 6 para. 1 lit. c DSGVO. In rare cases, the processing of personal data might become necessary in order to protect the vital interests of the data subject or another natural person. This would be the case, for example, if a visitor were to be injured on our premises and as a result his or her name, age, health insurance details or other vital information had to be passed on to a doctor, hospital or other third party. Then the processing would be based on Art. 6 para. 1 lit. d DSGVO. Finally, processing operations could be based on Art. 6(1)(f) DSGVO. Processing operations which are not covered by any of the aforementioned legal bases are based on this legal basis if the processing is necessary to protect a legitimate interest of our company or a third party, provided that the interests, fundamental rights and freedoms of the data subject are not overridden. Such processing operations are permitted to us in particular because they were specifically mentioned by the European legislator. In this respect, it took the view that a legitimate interest could be assumed if the data subject is a customer of the controller (recital 47, sentence 2 of the GDPR).



Legitimate interests in the processing pursued by the controller or a third party

If the processing of personal data is based on Art. 6 para. 1 lit. f DSGVO, our legitimate interest is the performance of our business activities for the benefit of the well-being of all our employees and our shareholders.

Duration for which the personal data are stored

The criterion for the duration of the storage of personal data is the respective statutory retention period. After expiry of the period, the corresponding data is routinely deleted if it is no longer required for the fulfilment or initiation of the contract.

Legal or contractual requirements to provide the personal data; necessity for the conclusion of the contract; obligation of the data subject to provide the personal data; possible consequences of not providing the data. We inform you that the provision of personal data is sometimes required by law (e.g. tax regulations) or may also result from contractual regulations (e.g. information on the contractual partner). Sometimes, in order to conclude a contract, it may be necessary for a data subject to provide us with personal data that must subsequently be processed by us. For example, the data subject is obliged to provide us with personal data if our company concludes a contract with him or her. Failure to provide the personal data would mean that the contract with the data subject could not be concluded. Before providing personal data by the data subject, the data subject must contact one of our employees. Our employee will inform the data subject on a case-by-case basis whether the provision of the personal data is required by law or contract or is necessary for the conclusion of the contract, whether there is an obligation to provide the personal data and what the consequences of not providing the personal data would be.

Existence of automated decision making

As a responsible company, we do not use automatic decision-making or profiling.

## Cookies

When you visit our website, we store information on your computer in the form of cookies. Cookies are small files that are transferred from an internet server to your browser and stored on its hard drive. Without consent, we only use technically necessary cookies on the legal basis of legitimate interest pursuant to Art. 6 (1) lit. f DSGVO.

In addition, when you visit our website for the first time, we ask for your consent to use cookies to improve our website or for marketing purposes. Only if you agree to this will these cookies be stored, the legal basis then being your consent in accordance with Art. 6 (1) lit. a DSGVO.

## Website analysis / Matomo

For the purpose of website analysis, data (IP address, time of visit, device and browser information as well as information on your use of our website) is automatically collected and stored using Matomo [<https://www.matomo.com>] technologies, from which usage profiles are created using pseudonyms. Cookies may be used for this purpose. The pseudonymised usage profiles are not combined with personal data about the bearer of the pseudonym without your express consent, which must be given separately.

## Hosting

The hosting of our internet pages and the website analysis software takes place within the European Union.

## Social Plugins from Facebook, LinkedIn, Xing

Social buttons from social networks are used on our website. These are only integrated into the page as HTML links, so that no connection is established with the servers of the respective provider when our website is called up. If you click on one of the buttons, the website of the respective social network opens in a new window of your browser. There you can click on the Like or Share button, for example.

## Online presence on Facebook, LinkedIn, Xing

Insofar as you have given your consent to the respective social media operator in accordance with Art. 6 para. 1 p. 1 lit. a DSGVO, your data will be automatically collected and stored for market research and advertising purposes when you visit our online presences on the social media mentioned above, from which usage profiles are created using pseudonyms. These can be used, for example, to place advertisements within and outside the platforms that presumably correspond to your interests. Cookies are generally used for this purpose. For detailed information on the processing and use of data by the respective social media operator, as well as a contact option and your rights and setting options in this regard to protect your privacy, please refer to the data protection notices of the providers linked below. Should you still require assistance in this regard, you can contact us.

We reserve the right to change our privacy policy should this be necessary due to new technologies. Please ensure that you have the latest version. If fundamental changes are made to this privacy policy, we will announce them on our website.