

I. PURPOSE OF THE PRIVACY POLICY

Wascosa operates its own websites at <https://www.wascosa.com> and www.wascosa.ch. The website is intended in particular to provide information relating to the products and services of Wascosa as well as concerning Wascosa as an employer. In addition, anyone interested in doing so has the option of contacting Wascosa. Interaction with persons outside the company may also occur through other channels, such as events, social media or within the ambit of a contractual (or pre-contractual) relationship.

In this Privacy Policy we, the companies from the Wascosa Group (hereafter referred to collectively as "Wascosa", "we" or "us"), explain how we collect and process personal data. It does not constitute a conclusive description; specific matters may potentially be regulated by other privacy policies or general terms and conditions of business, contracts, terms of participation and similar documents. Personal data means any information concerning an identified or identifiable natural person.

This Privacy Policy has been drafted having regard to the requirements set forth in the EU General Data Protection Regulation ("GDPR") and the Swiss Data Protection Act ("DSG"). However, the issue as to whether and to what extent this legislation is applicable will depend upon the circumstances of the specific individual case.

II. INFORMATION CONCERNING THE CONTROLLER

1 Name and contact details of the controller

Wascosa is the controller for the purposes of any processing of your personal data. Under the terms of the Swiss Federal Act on Data Protection (DSG) and the General Data Protection Regulation (GDPR) as well as other laws on data protection, the controller for the purposes of any processing of your personal data is the Wascosa group company that processes your data in relation to services provided to you or communication with you and decides concerning the purposes of and the instruments used for this data processing. The following companies are members of the Wascosa Group:

Wascosa Holding Ltd
Werftstrasse 4
6005 Lucerne
Switzerland

Wascosa Ltd
Werftstrasse 4
6005 Lucerne
Switzerland

Wascosa Asset Ltd
Werftstrasse 4
6005 Lucerne
Switzerland

Wascosa GmbH
Alter Steinweg 1
20459 Hamburg
Germany

Wascosa UK Limited
Studio 22 Bayles House
44-46 High Street
HU1 1PS Hull
England

Wascosa Ibérica SL
Avenida del Doctor Arge 14
28006 Madrid
Spain

Wascosa AG Italian Branch
via Dante 16
20121 Milan
Italy

Wascosa Polska Sp. z o.o.
ODPOWIEDZIALNOSCIA
Aleja Jana Pawła II 43A/37B
01-001 Warszawa
Poland

Wascosa Group Holding S.à r.l.
Heienhaff 1A
1736 Senningerberg
Luxembourg

2 Contact details for your enquiries

Email: info@wascosa.com

Wascosa has also appointed a Group Data Protection Officer.

This person can be contacted at datenschutz@wascosa.com.

III. BASIS FOR DATA PROCESSING

We process your data according to law within IT systems. We implement adequate security measures to maintain the confidentiality, integrity and availability of your personal data. This means that we can protect data against unauthorised or unlawful processing as well as the risks associated with loss, inadvertent alteration, unintended disclosure or unauthorised access.

Where and insofar as the General Data Protection Regulation (GDPR) is applicable, we process personal data in accordance with at least one of the following legal bases:

- Point (b) of Article 6(1) GDPR where the processing of personal data is necessary for the performance of a contract concluded with the data subject or to take steps prior to entering into a contract.
- Point (f) of Article 6(1) GDPR where the processing of personal data is necessary to safeguard the legitimate interests pursued by us or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject. Legitimate interests include in particular our interest in conducting our activities and operations on an ongoing basis, in a user-friendly manner, securely and reliably and being able to communicate concerning them, the guarantee of information security, protection against misuse, the enforcement of legal claims available to us and compliance with Swiss law.
- Point (c) of Article 6(1) GDPR where the processing of personal data is necessary for compliance with a legal obligation to which we are subject under any applicable law of a member state of the European Economic Area (EEA).
- Point (e) of Article 6(1) GDPR where the processing of personal data is necessary for the performance of a task carried out in the public interest.
- Point (a) of Article 6(1) GDPR where the processing of personal data occurs with the consent of the data subject.

IV. COLLECTION AND STORAGE OF PERSONAL DATA, HOW SUCH DATA ARE USED AND THE PURPOSE OF SUCH USAGE

Personal data can be provided voluntarily by the user or, for usage data, collected automatically whenever the website is used.

Any usage of cookies – or other tracking tools – by this website or providers of third party services that are used by this website occurs for the purpose of providing the service desired by the user as well as for the purposes described in this document.

The personal data that Wascosa processes independently or through third parties (for detailed information, see chapters VIII and IX) include:

- identification data (e.g. personal master data, name, address and gender in order to determine the form of address);
- contact data (e.g. email, telephone numbers);
- content data (e.g. text entered, photographs, videos);
- usage data (e.g. websites visited, content of interest, access times, cookies);
- meta/communication data (e.g. device information, IP addresses).
- Full details relating to each type of personal data processed are provided below in this Privacy Policy or specifically in the respective explanatory texts (disclaimers in emails and forms), which are displayed whenever data are collected.

1 When visiting the website

- If you have consented to the usage of cookies via the cookie banner (see section VI of this Privacy Policy), whenever our website is visited information will automatically be sent to our website's servers by the browser used on your device. This occurs as a result of the usage of cookies, which are described in detail in section VI, as well as in our cookie Policy (see chapter VI.). This information is stored temporarily in log files.

The data concerned are processed by us for the following purposes:

- guaranteeing a seamless connection with the website;
- guaranteeing ease of usage on our website;
- for the purpose of analysis, development, measurement of reach, obtaining effective KPIs as well as marketing;
- assessing system security and stability; and
- for other administrative purposes.

Wascosa processes these data on the basis of your consent (point (a) of Article 6(1) GDPR, where the GDPR is applicable) with reference to the purposes of data collection listed above.

2 When using our contact form

If you have any questions we offer you the option of contacting us using a contact form provided on the website. When doing so you need to provide your name, your contact details (surname, first name and email address) as well as a message text in order for your enquiry to be answered. Any mandatory fields are designated as such. The provision of additional information is optional. The legal basis for the subsequent processing of your personal data is your consent (point (a) of Article 6(1) GDPR, where the GDPR is applicable).

3 Retrieval of information

Wascosa offers the option of retrieving additional information (e.g. white paper etc.). In order to do so, a dedicated form needs to be completed, in which we collect personal data such as your email address, first name and surname. Any mandatory fields are designated as such. The legal basis for these data is consent (point (a) of Article 6(1) GDPR, where the GDPR is applicable, and our legitimate interest pursuant to point (f) of Article 6(1) GDPR, where the GDPR is applicable).

At least the following data are collected for the purpose of providing the service requested: email address, type of service requested (e.g. white paper). In order to ensure that we are acting in accordance with the law, the service is only activated after a DOI (double opt-in) procedure. Consent is also required. If you do not provide us with confirmation within 30 days, the information entered by you will be blocked and automatically erased after one month. Furthermore, in addition to the email address entered by you we also store your IP address along with the time of your enquiry and of your confirmation as proof of your contact and to prevent any potential misuse of your personal data.

4 When signing up for the infoletter

You can also sign up for our infoletter on our website. In this infoletter we provide you with information concerning our interesting new offers.

You can sign up for our infoletter according to the double opt-in procedure. This means that we shall send an email to the email address indicated by you after you have signed up, in which we ask you to confirm that it is the correct email address. If you do not confirm that you have signed up, the information entered by you will be blocked and automatically erased after one month. Furthermore, in addition to the email address entered by you we also store your IP address along with the time of your enquiry and of your confirmation as proof of your contact and to prevent any potential misuse of your personal data.

The legal basis for processing, where the GDPR is applicable, is your consent pursuant to point (a) of Article 6(1) GDPR. You can withdraw it at any time, with future effect, by clicking on the unsubscribe link contained in the infoletters sent to you.

5 When registering for (online and offline) events

On our website (more specifically in the event hub) you can find an overview of the events planned by us in the near future. You can also register for these events using the contact form. Unless indicated otherwise, all data requested must be provided. If the provision of personal data is expressly designated as voluntary in the registration form, the user may decide whether or not to provide that information. This decision does not have any impact on registration for or participation in the event.

At least the following data are collected for the purpose of providing the service requested: email address, surname, first name, form of address, type of service requested (e.g. registration for event). Furthermore, in addition to the data mentioned above we also store your IP address and the time of your registration as well as your confirmation. The purpose in doing so is to retain proof of your registration and to prevent any potential misuse of your data.

The legal basis for processing is your consent (point (a) of Article 6(1) GDPR, where the GDPR is applicable). You can withdraw it at any time, with future effect, by clicking on the unsubscribe link in the infoletters sent to you.

6 In relation to user-generated content/blogs

We also offer services on our website that enable you yourself to publish information, which is then made available to other website visitors (e.g. discussion forums and comments on blogs). Should you use these services, basic information identifying you as a "user" will be made available to other visitors to the website concerned, along with the content posted by you. This applies to any information entered by you voluntarily, e.g. your name or a pseudonym (nickname) and where applicable further information. You are responsible for deciding which data you are willing to disclose in relation to you.

We also receive details concerning your respective IP address and your email address, along with your name and the content posted.

The legal basis the processing of your personal data, where the GDPR is applicable, is the safeguarding of the legitimate interests of Wascosa (point (f) of Article 6(1) GDPR, where the GDPR is applicable). Our legitimate interest consists in enabling you to participate in forums and/or blogs and assessing the respective interest in forums and/or blogs for the purpose of improving our services and content.

7 Provision of our services

We process data in relation to the provision of our contractual services. When doing so we process identification data (e.g. customer master data, such as name or address), contact data (e.g. email, telephone numbers), content data (e.g. text entered etc.), contract data (e.g. contractual object, term), payment data (e.g. bank details, payment history), as well as usage and meta data (e.g. when assessing success and in relation to marketing initiatives). Data subjects may include our existing and prospective customers as well as their own respective customers, users, website visitors, employees and third parties. Processing occurs for the purpose of providing contractual services, billing and our customer service. The legal bases for processing are, where the GDPR is applicable, point (b) of Article 6(1) GDPR (steps taken prior to entering into a contract / performance of a contract) or point (f) of Article 6(1) GDPR (legitimate interest). Disclosure to third parties only occurs where this is necessary within the ambit of a project / order and provided that we are entitled to do so. When processing the data provided to us within the ambit of an order we act in accordance with the instructions issued by the person who placed the order as well as the legal requirements applicable to outsourced data processing (Article 28 GDPR, where the GDPR is applicable - where the order involves outsourced data processing within the meaning of the GDPR) and do not process data for any purposes other than those specified in the order.

We erase the data following expiry of legal warranty obligations and any comparable obligations. The requirement for data retention is reviewed intermittently. If any legal archival obligations apply, erasure occurs once they have expired.

8 LinkedIn Lead Gen

Wascosa offers the opportunity to receive content and information from and concerning Wascosa within the ambit of LinkedIn campaigns. In this context, Wascosa will provide information about how user data are processed and will refer to this Privacy Policy. In submitting the LinkedIn form, any user who is logged in to LinkedIn is deemed to have consented to the storage and processing by Wascosa of the data published by the user on the platform (LinkedIn). The legal basis for the processing of personal data is, where the GDPR is applicable, point (a) of Article 6(1) GDPR (consent) or point (f) of Article 6(1) GDPR (legitimate interest).

9 Processing of contact data following meetings in person on business premises

Wascosa processes any personal data that may be obtained through the personal exchange of contact data (e.g. visitor's cards) and upon request by the data subject. This occurs where there is a specific interest. The legal basis for processing is, where the GDPR is applicable, point (a) of Article 6(1) GDPR (consent) or point (f) of Article 6(1) GDPR (legitimate interest). The processing of personal data can be objected to at any time. The data subject will be informed by ordinary email within 30 days of the electronic recording of the data.

10 Job applications

If you apply for a job, we shall process the personal data that we require in order to assess your suitability for the job advertised. This includes in particular the following information:

- any information entered into an online form;
- the information contained in the documentation submitted (e.g. in the covering letter, CV, references etc.);
- if you have previously been employed by us or have previously applied for a job with us, we may use any information that we already hold as a result;
- where required, we may consult information from third party sources (as the case may be, information obtained from public registers or recruitment consultants, references as well as other job-related information that is publicly available online, such as for example a LinkedIn or Facebook profile);
- if you share any particularly sensitive data with us when applying for a job (e.g. data concerning health), we may also process any such personal data.

You are not obliged to provide any personal data to us. However, under normal circumstances it is not possible to process a job application unless we have collected and processed any personal data that are necessary in relation to it.

We store your personal data for as long as is necessary for the conduct of the specific job application process or in order to comply with legal requirements, or otherwise for as long as we have a legitimate interest in storage, e.g. for documentation and evidentiary purposes and for the exercise and defence of legal claims. If we are able to appoint you to the position for which you applied, we shall also retain your personal data for the purpose of the implementation of the employment relationship. If no employment contract is entered into with you, your personal data will be erased or anonymised. Otherwise, we shall only store your personal data if you have consented to storage for a longer period of time, e.g. in order to be considered as an applicant for any other vacant positions.

We only process personal data in accordance with this Privacy Policy for the purpose of receiving and examining the job application documents well as your suitability for the position concerned, and where appropriate for the drafting and conclusion of a contract. Depending upon the profile of requirements, this may also entail the review of references and the conduct of background checks. This processing is necessary: for the drafting and where applicable the conclusion of an employment contract; for compliance with legal obligations; for the exercise of rights; and for safeguarding the interest in particular in orderly human resources management. We may also use your personal data to contact you again in relation to other positions or pass your application details on to other Group companies, in the event that we are unable to offer you a suitable position. Where required by law, we shall obtain your consent to this.

As a general rule, only those persons who are involved in the appointment process have access to your personal data, including in particular HR specialists and potential line managers from the controller company. We may also share your personal data with our service providers, including in particular IT

service providers or external HR offices. We endeavour to ensure that data protection is also guaranteed by any such service providers through careful selection and contractual agreements.

It is possible that your data may also be transmitted to third parties situated abroad (e.g. Group companies or service providers) within the ambit of your application or for the above-mentioned purposes.

VI. COOKIES

Provided that you have granted your consent to us via a cookie banner, we typically use "cookies" and comparable technologies on our website, which can be used to identify your browser or device. A cookie is a small file that is sent to your computer or that is automatically saved on your computer or mobile device by the internet browser used whenever you visit our website. If you visit this website again, we shall therefore be able to recognise you as a user, even if we do not know who you are. In addition to cookies that are only used during a session and are deleted after your visit to the website ("session cookies"), cookies can also be used for a particular period of time (e.g. two years) to store user settings and other information ("permanent cookies"). However, you can configure your browser so that it rejects cookies, only stores them for the duration of a session or otherwise deletes them early. You can also easily change the specific cookies used on our website through our cookie settings in the website's footer. You can find out more here about the cookies that are used on our website.

1 Necessary cookies

We use "technically necessary cookies" in some areas of our website. These files enable your computer to be identified as a technical unit for the duration of your visit to this website, thereby enabling you to use our content. However, you generally have the option of configuring your internet browser to inform you about any cookies that are generated, so that you can either accept or reject them, or respectively delete any existing cookies. Please use your internet browser's help function to obtain information about how to change these settings. You can also manage at any time the cookies that are used on our website through our cookie settings in the website's footer. Please note that some aspects of our website may not work properly if you have disabled technically necessary cookies. The legal basis for the usage by us of technically necessary cookies, where the GDPR is applicable, is point (f) of Article 6(1) GDPR: processing occurs or the purpose of enabling the proper operation of our website. It is therefore necessary in order to safeguard our legitimate interests.

2 Additional cookies

We also use the following cookies in order to establish how you use our content and to be able to display additional content to you that may be of interest. The cookies described below are only used if you have previously consented (where the GDPR is applicable, according to point (a) of Article 6(1) GDPR) via our cookie banner.

2.1 Usage of Google Analytics:

We use Google Analytics, a web analysis service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. The information generated by the cookie relating to your usage of this website is generally transmitted to a Google server situated in the USA and stored at that location. As IP anonymisation has been activated on this website, your IP address will however previously be truncated by Google within a Member State of the European Union or within the territory of another contracting party to the Agreement on the European Economic Area. The full IP address will only be transferred to a Google server in the USA and truncated at that location under exceptional circumstances. Google uses

this information on our behalf to assess how you use the website, to compile reports concerning website activity and to provide further services to us in relation to website and internet usage.

The IP address transferred by your browser within the ambit of Google Analytics is not cross-referenced with any other data held by Google. You can prevent cookies from being stored via the respective settings in your browser software or via the settings in our cookie banner; however, please note once again that, should you do so, it is possible that you may not be able to use all functions of this website in full. You can also prevent the data generated by the cookie in relation to your usage of the website (including your IP address) from being sent to Google, as well as any processing of these data by Google, by downloading and installing the browser plugin available on the following page <http://tools.google.com/dlpage/gaoptout?hl=de>.

Please note that Google Analytics has been supplemented on this website by the code "gat._anonymizeIp();" in order to ensure that IP addresses are recorded anonymously (known as "IP masking").

Further information concerning the Terms of Service and the Privacy Policy can be found at www.google.com/analytics/terms/de.html and at <https://policies.google.com/privacy?hl=de&gl=de>. The legal basis for the usage of the above-mentioned analytical tools by us is your consent (where the GDPR is applicable: point (a) of Article 6(1) GDPR).

2.2 Usage of Google Ads Conversion and Remarketing

We use Google Ads Conversion provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland in order to draw attention to our attractive products through advertising (known as Google Ads) placed on external websites. We can use data relating to advertising campaigns in order to establish how successful individual advertising initiatives have been. In doing so we pursue the interest of displaying advertising to you that reflects your interests, designing our website in a manner that is more interesting for you and enabling advertising costs to be fairly calculated. This advertising is provided by Google via so-called "ad servers". For this purpose we use ad server cookies so that we can assess particular parameters for measuring success, such as ad displays or user clicks.

If you are directed to our website after clicking on a Google ad, a cookie will be stored on your device by Google Ads. These cookies normally expire after 30 days. Cookies of this type are generally used to store analytical information such as the unique cookie ID, the number of impressions per ad (frequency), the last impression (relevant for post-view conversions) as well as opt-out information (an indication that the user no longer wishes to be targeted). These cookies enable Google to recognise your internet browser. If a user has visited particular pages on the website of an Ads customer, as long as the cookie stored on his or her computer has not yet expired, both Google and the customer can establish that the user has clicked on an advert and been directed to this page. A different cookie is allocated to each Ads customer.

This means that cookies cannot be tracked beyond the website of the specific Ads customer. We do not collect and process any personal data ourselves within the ambit of the advertising measures described. We are only provided with statistical assessments by Google. We can use these assessments to establish which of the advertising measures used has been particularly effective. We do not receive any further data from the usage of advertising; specifically, we are not able to identify users according to this information. On account of the marketing tools used, your browser automatically creates a direct connection with the Google server. We do not have any influence over the extent of usage or over any further usage of the data collected by Google using this tool. As such, the information we provide you is based on our understanding of the position. As a result of the incorporation of Ads Conversion, Google is informed concerning the fact that you have visited the respective part of our website or clicked on one of our

adverts. If you have registered for a Google service, Google is able to allocate the visit to your account. Even if you have not registered with Google or are not logged in, it is possible that the provider may identify and store your IP address.

We also use Google Ads remarketing. Using the remarketing function, we are able to display interest-based adverts to users of our website when they visit other websites within the Google advertising network (in Google searches or on YouTube, known as "Google ads", or on other websites). This involves an analysis of how the user interacts with our website, e.g. the content in which the user has displayed an interest, so that targeted adverts can be displayed to the user, also on other websites, after visiting our own website. For this purpose, Google saves a number in the browsers of users who visit particular Google services or websites within the Google display network. The visits made by this user are recorded using this number, which is referred to as a "cookie". This number is used to identify unequivocally an internet browser on a particular device and not to identify any specific person; no personal data are stored.

You can block this tracking process in various ways:

- by objecting to the usage of cookies at the start of your visit to the website via the cookie banner;
- by adjusting the cookie settings in the website's footer, where you can store your preferences;
- by configuring your browser software accordingly, and specifically by blocking third party cookies, which means that you will not be displayed any adverts from third party providers;
- by installing the plugin provided by Google on the following page: <https://www.google.com/settings/ads/plugin>;
- by disabling interest-based advertising from providers that have adhered to the self-regulatory initiative "About Ads" on the page <http://www.aboutads.info/choices>, although please note that this setting will be cancelled if you delete your cookies;
- by permanently disabling tracking in your Firefox, Internet Explorer or Google Chrome browser on the page <http://www.google.com/settings/ads/plugin>;

Further information concerning data protection at Google can be found here:

<http://www.google.com/intl/de/policies/privacy> and <https://services.google.com/sitestats/de.html>.

Alternatively, you can visit the website of the Network Advertising Initiative (NAI) at

<http://www.networkadvertising.org>.

The legal basis for such usage is your consent (where the GDPR is applicable: point (a) of Article 6(1) GDPR).

2.3 Usage of the Facebook pixel

The website also uses the "Custom Audiences" remarketing function operated by Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland ("Facebook"). This enables interest-based adverts ("Facebook ads") to be displayed to website users when using the social network Facebook or when visiting other websites that also use the process. In doing so we pursue the interest of displaying advertising to you that reflects your interests in order to design our website in a manner that is more interesting for you. On account of the marketing tools used, your browser automatically creates a direct connection with the Facebook server. We do not have any influence over the extent of usage or over any further usage of the data collected by Facebook using this tool. As such, the information we provide you is based on our understanding of the position. As a result of the incorporation of Facebook Custom Audiences, Facebook is informed concerning the fact that you have visited the respective website or clicked on one of our adverts. If you have registered for a Facebook service, Facebook is able to allocate the visit to your account. Even if you have not registered with Facebook or are not logged in, it is possible that the provider may identify and store your IP address and other identifying features.

The "Facebook Custom Audiences" function can be disabled [here](#) and for users who have logged in at <https://www.facebook.com/settings/?tab=ads#>. The legal basis for such processing is your consent (where the GDPR is applicable: point (a) of Article 6(1) GDPR). Further information concerning data processing by Facebook can be obtained at <https://www.facebook.com/about/privacy>.

2.4 Usage of LinkedIn Insight

Our website uses the "LinkedIn Insight Tag", an analytical and tracking tool operated by LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland. The LinkedIn Insight Tag enables data to be collected in relation to visits to our website, including URL, referrer URL, IP address, device and browser characteristics, time stamp and page views. These data are encrypted and are anonymised within seven days, following which the anonymised data are erased within 90 days. LinkedIn does not share any personal data with us, but rather offers only summary reports concerning website target groups and advert performance. LinkedIn also offers retargeting for website visitors so that we can use these data to display targeted advertising outside our website, without the member being identified as a result. Members of LinkedIn can manage how their personal data are used for advertising purposes via their account settings.

The LinkedIn Insight Tag is used for the purpose of enabling detailed campaign reports to be drawn up and to obtain information concerning visitors to our website, and hence our advertising and marketing interests. As a customer of LinkedIn marketing solutions we use the LinkedIn Insight Tag to track conversions, to conduct retargeting for visitors to our website and to obtain additional information concerning members of LinkedIn who look at our adverts. The "LinkedIn Insight Tag" function can be disabled. If you are a member of LinkedIn and do not wish LinkedIn to collect data concerning you via our website and thereafter to associate it with your member's data stored with LinkedIn, you need to log out of LinkedIn before visiting our website. You can adjust the settings for marketing cookies in our website's footer. You can also block this tracking process by configuring the settings accordingly in your browser software. You can change the settings in your internet browser so as to disable or restrict JavaScript and thus also prevent data from being stored. Please note that, should you so do, it is possible that you may no longer be able to use all functions of the website in full. In order to prevent JavaScript code from being executed in general, you can also instal a JavaScript blocker, such as e.g. the browser plugin NoScript. The legal basis for such processing is your consent (where the GDPR is applicable: point (a) of Article 6(1)). Further information concerning data processing by LinkedIn can be obtained in the LinkedIn [Privacy Policy](#) and [Cookie Policy](#).

2.5 Usage of YouTube

We have embedded YouTube videos within our website. These videos are stored on <https://www.youtube.com>. They are displayed on our website using "framing technology" and can be played back directly on it. Embedding occurs according to the "enhanced data protection mode", which means that none of your data are transmitted to YouTube unless and until you provide your consent by playing back the video. If you have consented to cookies via the cookie banner and play back a video, data are transferred to YouTube, a company owned by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. We do not have any influence over this transfer of data. The data transferred consists in the information that a particular page on our website has been visited by you. In addition, your IP address, the date and time of the enquiry, the time zone, the content of the enquiry, access status, the volume of data transferred, the browser used by you as well as the type and version of the operating system are also transmitted.

This transfer occurs irrespective of whether you have a YouTube user account. If you are logged in to a Google user account, your data will be allocated directly to this account. If you do not wish this to occur, you can reject cookies via the cookie banner, or should log out of your user account before playing back the video. The data transmitted to YouTube are stored by YouTube in the form of a usage profile and are used for advertising and market research purposes as well as the personalised display of content on your website. YouTube can use this assessment to generate needs-based advertising (including for users who are not logged in) and to inform other YouTube users that you have visited our portal. You can object to the creation of this user profile. You have to contact YouTube in order to do so.

You can find out more about data processing by YouTube at <https://www.google.de/intl/de/policies/privacy> as well as your rights and settings options within your privacy settings, and also change your own settings on that page. Personal data are processed by Google also in the USA. In this regard, Google has subjected itself to the EU-US Privacy Shield: <https://www.privacyshield.gov/EU-US-Framework>. The legal basis is your consent in accordance with point (a) of Article 6(1)) GDPR.

2.6 Sprout Social

We use the services provided by Sprout Social, which is operated by Sprout Social Inc., 131 Dearborn St. Floor 7, Chicago, IL 60603, USA. We use Sprout Social functions to manage user concerns submitted to us via our profiles on social networks or by private message. Sprout Social is a customer management tool that displays our social media profiles in one single place in order to ensure transparency, efficacy and analysis and also so that messages and contributions can be responded to quickly. As part of this process at least your IP address is transmitted to Sprout Social. Data processing occurs on Sprout Social servers situated in the USA. Any data included by you in your own messages or contributions on our social media profiles that are also directly visible to us on our own social media profiles are also recorded. The usage of Sprout Social constitutes a legitimate interest within the meaning of point (f) of Article 6(1) GDPR. You can find further information in the Sprout Social Privacy Policy at: <https://sproutsocial.com/privacy-policy/>.

VII. YOUR RIGHTS

You can exercise specific rights in relation to your data that are processed by Wascosa. You have in particular the following rights:

- The right to obtain confirmation from us as to whether personal data concerning you are being processed, and if so which data.
- The right to receive from us particular personal data in a commonly used electronic format or to obtain their transfer to another controller.
- The right to obtain the correction by us of any data that are inaccurate.
- The right to obtain the erasure of data, unless this is prevented by any retention requirements or any rights of retention.
- If you have requested erasure or the restriction of processing, we may include your address (and in particular your email address) in a "blocked list". This means that we can prevent your address being obtained again from a particular source or existing instructions being overwritten.
- The right to object. If the processing of your personal data is based on a legitimate interest of Wascosa, you can object to the usage of your personal data, although only insofar as your circumstances are such that your own personal interest precludes any usage of your personal data. The foregoing is likewise without prejudice to any compelling overriding interests of Wascosa. An objection will not affect any processing that has a different legal basis.
- The right to withdraw consent with future effect, insofar as the processing by us is based on your consent.

- The right, upon request, to obtain further information that is necessary in order to exercise these rights.
- The right to lodge a complaint with the competent supervisory authority.

How to exercise rights: you can submit any requests relating to the exercise of your rights directly to the controller (see the contact details in section II). Requests can be made free of charge and will be acted on by us as soon as possible, within no more than one month.

VIII. OTHER RECIPIENTS OF YOUR PERSONAL DATA

Wascosa may avail itself of auxiliary agents when processing your personal data for the purpose of providing commercial and/or administrative services and within the ambit of IT services (including both within the Wascosa Group as well as external IT service providers), which auxiliary agents process data on behalf of Wascosa. Data protection is guaranteed at all times.

Please note that, notwithstanding the above, data may be shared in anonymised form at any time.

IX. LOCATION OF DATA PROCESSING

Your personal data are processed as a general rule at the registered office of a Wascosa company. If any third parties are involved in processing as auxiliary agents (processors), processing may occur away from a Wascosa location, and may take place in Switzerland, in the UK, in the EU or in a third country.

Tools of third parties based in third countries, such as e.g. USA, may be incorporated into our website or used in order to provide services. If these tools are active, your personal data may be transferred to the servers of the respective company. For example, the CRM system is operated by a third party based in the USA. The personal data processed are however stored in a European cloud.

Please also note that data exchanged over the internet are often routed through third countries. This means that your data may be transferred out of the country even if the sender and the recipient are both situated in the same country.

Wascosa reviews all auxiliary agents with reference to various issues (data protection, data security, IT, legal) and, if necessary, concludes appropriate data protection agreements that incorporate the current EU standard contractual clauses before availing itself of the services of a third party company.

If you would like to receive more specific information, please contact the controller at any time (see section II).

X. DURATION OF RETENTION/ERASURE OF PERSONAL DATA

Personal data are processed and stored for as long as is necessary for the purpose for which they were collected. Accordingly:

- Personal data collected for the purpose of the performance of a contract concluded between Wascosa and you will as a general rule be stored until the contract has been performed in full, and thereafter for the duration of any legal retention requirements and for as long as any retrospective claims can be made under the contract.

- Personal data collected for the purpose of safeguarding the legitimate interests of Wascosa will be retained for as long as is necessary in order to fulfil these purposes. You can obtain more detailed information concerning legitimate interests in the corresponding sections of this document or by contacting the controller at dsg@Wascosa.com.
- In addition, we shall store personal data for a longer period of time if you have consented to such processing. The data will naturally be erased if you withdraw your consent.
- The data processed by Wascosa will be erased, or processing will be restricted, following expiry of the legal retention periods and the legal rights of retention, or as required by law. In the event that processing is restricted the data will be blocked and will not be processed for any other purposes. This applies e.g. for data that must be retained due to requirements under commercial law or tax law.

XI. STATUS OF THE PRIVACY POLICY

The Privacy Policy is valid as at 1 September 2023.

Wascosa will amend this Privacy Policy in line with any new or changing needs. You can access the currently applicable version at any time on the website at [this link](#)