



**PRIVACY NOTICE  
FOR THE WEBSITE  
OF THE  
HERING SCHUPPENER GROUP**

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## 1. SCOPE

This privacy notice applies to the Internet offer of the Hering Schuppener Group <https://hering-schuppener.com> and to the personal data collected via these Internet pages. The data protection notices and declarations of other providers to which reference is made, for example via links, apply to the Internet pages of these providers.

According to Article 4 of the GDPR, personal data is any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an on-line identifier, or one or more factors specific to the physical, physiological, genetic, psychological, economic, cultural or social identity of that natural person.

References to legal regulations refer to the General Data Protection Regulation (GDPR), as well as the Federal Data Protection Act (BDSG) in the version valid from 25.05.2018.

## 2. CONTROLLER

The competent controller within the meaning of the General Data Protection Regulation (GDPR), other data protection laws applicable in member states of the European Union, and other provisions relating to data protection is:

### **Hering Schuppener Consulting Strategieberatung für Kommunikation GmbH**

Address: Berliner Allee 44, 40212 Düsseldorf

Commercial Register: Düsseldorf Local Court, Commercial Register Number HRB 4065

VAT ID: DE215379414

Management Board: Alexander Geiser, Tina Mentner, Dr Brigitte von Haacke, Dr Phoebe Keibel, Dr Hans-Elmar Döllekes

For this website the following companies of the Hering Schuppener Group are included:

### **Hering Schuppener Unternehmensberatung für Kommunikation GmbH**

Address: Berliner Allee 44, 40212 Düsseldorf

Commercial Register: Düsseldorf Local Court, Commercial Register Number HRB 31684

VAT ID: DE171396270

Management Board: Folker Dries, Dr. Hans-Elmar Döllekes

### **Hering Schuppener Consulting Corporate Affairs & Public Strategies GmbH**

Address: Berliner Allee 44, 40212 Düsseldorf  
Commercial Register: Düsseldorf Local Court, Commercial Register Number HRB 64949  
VAT ID: DE275642786

Management Board: Alexander Geiser, Tina Mentner

### **3. CONTACT PERSON**

The Hering Schuppener Group has appointed a company group data protection officer (DPO) in accordance with Article 37 of the GDPR.

The contact details of the data protection officer of the Hering Schuppener Group:

Data Protection Officer  
Berliner Allee 44  
40212 Düsseldorf  
e-mail: [privacy@heringschuppener.com](mailto:privacy@heringschuppener.com)

### **4. WHAT SOURCES AND DATA DO WE USE?**

When you call up our web pages, you transmit data to our web server via your Internet browser (for technical reasons). The following data is recorded during an ongoing connection for communication between your Internet browser and our web server:

- Date and time of the request
- Name of the requested file
- Page from which the file was requested
- Access status (file transferred, file not found, etc.)
- Web browser and operating system used
- Complete IP address of the requesting computer
- Amount of data transmitted

For reasons of technical security, in particular to defend against attempts to attack our web server, this data is stored by us for a short time. It is not possible for us to draw conclusions about individual persons on the basis of this data. After seven days at the latest, the data is anonymised by shortening the IP address at domain level, so that it is no longer possible to establish a link to the individual user. In anonymised form, the data is also processed for

statistical purposes; it is not compared with other data sets or passed on to third parties, even in excerpts.

With the exception of the above-mentioned data, personal data is only stored if you provide it to us voluntarily, e.g. as part of a registration, a survey or in order to execute a contract, and in these cases only to the extent that we are permitted to do so on the basis of your consent or in accordance with the applicable legal provisions (for further information, please refer to the section "Processing purposes and legal basis" below).

You are neither legally nor contractually obliged to provide us with your personal data. However, it is possible that certain functions of our websites depend on the provision of personal data. If you do not provide personal data in such cases, this may result in functions not being available or only available to a limited extent.

## **5. PROCESSING PURPOSES AND LEGAL BASIS**

We process personal data in accordance with the provisions of the European General Data Protection Regulation (GDPR), the Federal Data Protection Act (BDSG) and other relevant laws.

We use the personal data collected during a visit to our website to make it as convenient as possible for you and to protect our IT systems from attacks and other illegal activities.

If you provide us with further personal data, e.g. within the scope of a registration, a contact form, a survey or for the execution of a contract, we will use this data for the aforementioned purposes, for customer administration purposes and - if necessary - for the processing and invoicing of any business transactions, in each case to the extent necessary for this purpose.

Insofar as you have given us your consent to process your personal data, this constitutes the legal basis for the processing (Article 6(1)(a) of the GDPR). Any consent granted can be revoked at any time. This also applies to the revocation of declarations of consent which were issued to us prior to the validity of the GDPR, i.e. before 25 May 2018. Please note that the revocation is only effective for the future. Processing operations that took place before the revocation are not affected.

The legal basis for processing personal data for the purposes of initiating or fulfilling a contract with you is Article 6 paragraph 1 letter b GDPR.

Insofar as the processing of your personal data is necessary for the fulfilment of our legal obligations (e.g. for the storage of data), we are obliged to do so in accordance with Art. 6 Par. 1 letter. c GDPR.

In addition, we process personal data for the purpose of safeguarding our legitimate interests and the legitimate interests of third parties in accordance with Art. 6 Para. 1 letter f GDPR. Such legitimate interests include maintaining the functionality of our IT systems, but also the marketing of our own and third-party products and services and the legally required documentation of business contacts.

## **6. RECIPIENT AND TRANSMISSION TO THIRD PARTIES**

### **Hering Schuppener Group**

In the company, only those persons who need access to your data have access to it.

### **Processors and other service providers**

We have commissioned a specialised service provider to operate our website. In connection with the maintenance and servicing of the systems, this service provider may also obtain knowledge of your personal data. We have concluded a so-called order processing contract with this service provider, which ensures that data processing is carried out in a permissible manner.

For the optimization of our websites, other qualified service providers (IT service providers, marketing agencies) can also be used. We only pass on personal data to these service providers if this is necessary for the provision and use of the websites and their functionalities, for the pursuit of legitimate interests or if you have consented to this. In case of order processing, an order processing contract will be concluded to ensure that the data processing is carried out in a permissible manner.

### **Third-party offers**

Our websites may also contain offers from third parties. If you click on such offers, we will transfer data to the respective provider to the required extent (e.g. information that you have found this offer with us and, if applicable, further information that you have already provided for this purpose on our web pages).

### **Social plug-ins**

If we use so-called "social plug-ins" of social networks such as Facebook, Twitter, XING and Google+ on our websites, we integrate them as follows:

When you visit our websites, the social plug-ins are deactivated, i.e. no data is transmitted to the operators of these networks. If you want to use one of the networks, click on the respective social plug-in to establish a direct connection to the server of the respective network.

If you have a user account with the network and are logged in at the moment the social plugin is activated, the network can assign your visit to our websites to your user account. If you want to avoid this, please log out of the network before activating the social plug-in.

When you activate a social plug-in, the network transmits the content it makes available directly to your browser, which embeds it into our websites. In this situation, data transfers can also take place, which are initiated and controlled by the respective social network. Your connection to a social network, the data transfers between the network and your system, and your interactions on this platform are governed solely by the privacy policy of the respective network.

The social plug-in will remain active until you disable it or delete your cookies (see the "Cookies" section below for more information).

If you activate a social plug-in, it is possible that personal data may be transferred to providers in countries outside the European Economic Area which, from the point of view of the European Union ("EU"), do not guarantee an "adequate level of protection" for the processing of personal data that meets EU standards. Please bear this in mind before you activate a social plug-in and thus trigger a transfer of your data.

### **Google Analytics and Tag Manager**

This website uses the service "Google Analytics", which is offered by Google Inc., to analyse the website use by users.

Google Inc. (1600 Amphitheatre Parkway Mountain View, CA 94043, USA) is certified according to the EU-U.S. Privacy Shield.

The service uses "cookies" - text files which are stored on your end device. The information collected by the cookies is usually sent to a Google server in the USA and stored there.

On this website IP-anonymisation is used. The IP address of users is shortened within the member states of the EU and the European Economic Area. Due to this shortening, the personal reference of your IP address is no longer necessary. As part of the agreement on order processing concluded by the website operator with Google Inc., the latter uses the information collected to create an evaluation of website use and website activity and provides services associated with Internet use.

You have the option of preventing the storage of the cookie on your device by making the appropriate settings in your browser. It cannot be guaranteed that you will be able to access all functions of this website without restrictions if your browser does not allow cookies.

You can prevent the transmission of your data and its collection and processing by Google. Google informs about this via the following link:

<https://tools.google.com/dlpage/gaoptout?hl=de>

Here you will find further information on the use of data by Google Inc:

<https://support.google.com/analytics/answer/6004245?hl=de>

We may also use the "Google Tag Manager" to integrate and manage Google's analysis and marketing services into our website.

With this service, website tags can be managed via an interface. The Google Tool Manager only implements tags. This means: no cookies are used, and no personal data is collected. The Google Tool Manager triggers other tags, which in turn may collect data. However, Google Tag Manager does not access this data. If a deactivation has been made at the domain or cookie level, it will remain in effect for all tracking tags to the extent that they are implemented with the Google Tag Manager.

## **LinkedIn**



Within our online offer we use the marketing functions (so-called "LinkedIn Insight Tag") of the network LinkedIn. The provider is the LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA.

Every time you access one of our pages that contains LinkedIn functions, a connection to LinkedIn servers is established. LinkedIn is informed that you have visited our website with your IP address. In particular, the LinkedIn Insight Tag allows us to analyse the success of our campaigns within LinkedIn or to target audiences based on how users interact with our online services. If you are registered with LinkedIn, LinkedIn will be able to associate your interaction with our site with your user account.

LinkedIn is certified under the Privacy Shield Agreement and thus offers a guarantee of compliance with European data protection law:

<https://www.privacyshield.gov/participant?id=a2zt0000000L0UZAA0&tatus=Active>

Here you will find further information on data usage by LinkedIn:

<https://www.linkedin.com/legal/privacy-policy>

Here you will find the LinkedIn cookie policy:

<https://www.linkedin.com/legal/cookie-policy>

You can prevent the transfer of your data and its collection and processing by LinkedIn.

LinkedIn informs about this via the following link:

<https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>

## **Vimeo**

Videos about Vimeo.com are included on this website. This is a service provided by Vimeo, Inc, 555 West 18th Street, New York, New York 10011, USA (hereinafter referred to as "Vimeo").

When you access videos through Vimeo, a connection is made to Vimeo's servers in the USA. This transfers certain information to Vimeo. It is also possible that Vimeo will place cookies on your device. Vimeo also allows you to use certain other functions, such as rating or sharing videos. You may be required to log in to Vimeo or certain third parties (such as Facebook or

Twitter) with your account so that they can associate the information you submit with your account.

These features are offered exclusively by Vimeo and the respective third-party providers, and you should carefully review their privacy policies before using the respective features. Through the integration, Vimeo may also receive information that your browser has accessed the corresponding page on this website, even if you do not have a Vimeo account or are not currently logged in to Vimeo.

Vimeo is an active participant in the EU-U.S. Privacy Shield Framework, which regulates the correct and secure transfer of personal data. You can find more information on this at:

<https://www.privacyshield.gov/participant?id=a2zt00000008V77AA&status=Active>.

For information on data protection at Vimeo, please see

<https://vimeo.com/privacy>.

## **7. COOKIES**

Cookies are small text files that are stored on your computer when you call up our website and enable your browser to be reassigned. Cookies store information such as your language setting, the duration of your visit to our website or your entries made there.

There are different types of cookies. Session cookies are temporary cookies that are stored in the user's Internet browser until the browser window is closed and the session cookies are deleted. Permanent or persistent cookies are used for repeated visits and are stored in the user's browser for a predefined time. First-party cookies are set by the website that the user visits. Only this website may read information from the cookies. Third party cookies are set by organizations that are not operators of the website the user is visiting. These cookies are used by marketing companies, for example.

The cookies used on this website are:

<b>Name</b>	<b>Description</b>	<b>Type</b>	<b>Functional life</b>
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Borlabs cookie	Saves the settings of visitors selected in the Cookie Box of Borlabs Cookie.	First-party cookie	1 year
wordpress	Wordpress cookies to improve the stability and usability of the site.	Session cookie	Session
xmapping	Saves the address and port number of the web server that manages the session. Is used to improve the performance security of the website.	Session cookie	Session
google-analytics	Cookie from Google for website analysis. Generates statistical information about how visitors use the website.	Third party cookie	2 years
google day manager	Cookie from Google to control advanced script and event handling.	Third party cookie	2 years

## 8. DATA STORAGE

We delete your IP address and the name of your Internet service provider, which we only store for security reasons, after seven days. Otherwise, we delete your personal data as soon as the purpose for which we collected and processed the data no longer applies. Beyond this point in time, data will only be stored if this is necessary according to the laws, regulations or other legal provisions of the European Union or a member state of the European Union to which we are subject.

## 9. DATA TRANSFERS TO THIRD COUNTRIES

If we transfer personal data to service providers or group companies outside the European Economic Area (EEA), the transfer will only take place if we are authorized to transfer the data and the third country has been confirmed by the EU Commission as having an adequate level

of data protection or if other appropriate data protection guarantees (e.g. binding internal corporate rules or EU standard contract clauses) are in place.

Further information and a copy of the measures implemented can be obtained from the Group Data Protection Officer.

## **10. YOUR RIGHTS**

Every data subject has the right of access under Art. 15 GDPR, the right of rectification under Art. 16 GDPR, the right of deletion under Art. 17 GDPR, the right to restrict processing under Art. 18 GDPR and the right to data transferability under Art. 20 GDPR.

With regard to the right of information and the right of deletion, the restrictions according to §§ 34 and 35 BDSG apply.

In addition, there is a right of appeal to a data protection supervisory authority (Art. 77 GDPR in conjunction with Section 19 BDSG):

**Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen**  
PO Box 20 04 44  
40102 Düsseldorf  
Phone: 0211/38424-0  
Fax: 0211/38424-10  
E-Mail: [poststelle@ldi.nrw.de](mailto:poststelle@ldi.nrw.de)

### **Information on your right of objection under Art. 21 (GDPR)**

#### **Right of objection based on individual cases**

**Under Article 21 of the GDPR, you have the right to object at any time, for reasons arising from your particular situation, to the processing of personal data relating to you on the basis of Article 6(1)(e) GDPR (data processing in the public interest) and Article 6(1)(f) GDPR (data processing based on a balancing of interests); this also applies to profiling within the meaning of Article 4(4) GDPR based on this provision.**

**If you object, we will no longer process your personal data, unless we can prove compelling reasons for processing that are worthy of protection, that outweigh your interests, rights and freedoms or the processing serves to assert, exercise or defend legal claims.**

**The objection can be made without any formalities. You will find our contact details under points 2 and 3.**

## **11. TECHNICAL SAFETY**

We use technical and organizational security measures to protect your data managed by us against manipulation, loss, destruction and against access by unauthorized persons. We continuously improve our security measures in accordance with technological developments.

For security reasons and to protect the transmission of personal data and other confidential contents (e.g. orders or inquiries to the responsible person), this website uses SSL or TLS encryption. You can recognize an encrypted connection by the character string "https://" and the lock symbol in your browser line.

For security reasons, we recommend that you transmit e-mails exclusively in encrypted form. There are considerable risks involved in transmitting unencrypted messages. Therefore, please do not send us any sensitive data by unencrypted e-mail.

## **12. PROFILING**

We do not use purely automated decision-making procedures under Article 22 of the GDPR.

If we should nevertheless use such a procedure in individual cases in the future, we will inform you of this separately, insofar as this is required by law.

## **13. AMENDMENT OF THE DATA PROTECTION NOTICE**

We may change this privacy statement at any time by posting the amended version on this website, including the effective date of the amended version.

Date of publication: 16.03.2020