Privacy Policy Claranet DACH

Long version



claranet Make modern happen®

Table of contents

1. General **3**

2. Responsible body **3**

3. Data protection officer **3**

3.1. Claranet GmbH and Claranet Addon GmbH 3

3.2. Claranet Switzerland GmbH 4

4. Data processing in Switzerland **4**

4.1. Basis for data processing 4

4.2. Definitions 4

5. Affiliated companies **4**

5.1. Joint controllers pursuant to Art. 26 (2) GDPR 5

6. Claranet websites and portals **5**

6.1. Cookies and tracking technologies 6

6.1.1. Why does Claranet use cookies? 6

6.1.2. Information about the cookies used by Claranet 6

6.1.3. How can I disable cookies? 7

6.1.4. We divide cookies into the following categories 7

6.1.5. Cookie management with CookieFirst 8

6.1.6. Cookie management with Evalanche 8

6.1.7. Additional tracking technologies: Evalanche 9

6.1.8. Other tracking technologies: Matomo 10

6.2. Online advertising 10

6.2.1. Google Ads/Remarketing 10

6.2.2. Google Analytics and Google Tag Manager 11

6.2.3. Google Maps 13

6.2.4. YouTube 13

6.2.5. Microsoft Advertising 13

6.3. LinkedIn Conversion Tracking and Retargeting Technology 15

6.4. Trustpilot company profile and review management 15

6.5. Live chat (Lime Connect) 16

6.6. SalesViewer 17
7. Form entries 17
7.1. Enquiry form 18
7.2. White paper download 19
7.3. Registration for local events 19
7.4. Webinar registration 20
7.5. Booking a seminar 21
8. Whistleblower System 22
9. Customer data 23
10. Usage of AI systems 26
11. Ordering our newsletter 26
12. Online presence on social media 27
13. Applying to Claranet 28
14. Employee recruitment 30
15. Communication and collaboration with Claranet 31
15.1. By E-mail and collaboration platforms 31
15.2. By phone 31
15.3. Via messenger 32
15.4. Via online appointment booking 32
15.5. Via Docusign 33
15.6. Through satisfaction surveys 34
15.6.1. Surveys via Microsoft Dynamics 365 Customer Voice 34
15.6.2. Surveys via Servicenow after processing an incident tickets 35
16. Room rental 36
17. Visits and appointments at Claranet 36
18. Data not collected from the data subject 37
18.1. Dealfront 37
19. Your rights 37
20. Recipients outside the EU 38
21. Further information and notices 39

1. General

We, **Claranet GmbH**, Hanauer Landstraße 196, D-60314 Frankfurt am Main, **Claranet Addon GmbH**, Wolfgang-Brumme-Allee 25, D-71034 Böblingen**,** and **Claranet Switzerland GmbH,** Gate 55, Flughofstrasse 55, CH-8152 Glattbrugg (hereinafter collectively referred to as "Claranet"), take the protection of your personal data seriously and adhere to the rules of data protection laws. The following statement provides an overview of how we ensure this protection. In particular, we would like to explain what type of data we collect, why we collect this data, how we use this data and how you can determine how your personal data is handled at any time.

2. Responsible body

Claranet GmbH	Claranet Addon GmbH	Claranet Switzerland GmbH
Hanauer Landstraße 196	Wolfgang-Brumme-Allee 25	Gate 55, Flughofstrasse 55
D-60314 Frankfurt	D-71034 Böblingen	CH-8152 Glattbrugg
Phone: +49 (0)69 - 40 80 18 0	Phone: +49 (0)7031 - 71 77 0	Tel: +41 (0)44 8 42 77 11
Fax: +49 (0)69 - 40 80 18 100	Fax: +49 (0)7031 - 71 77 10	Fax: +41 (0)44 8 42 77 10
E-mail: de-info@claranet.com	E-mail: de-info@claranet.com	E-mail: ch-info@claranet.com
Web: https://www.claranet.com/de/	Web: https://www.claranet.com/de/	Web: https://www.claranet.com/ch/

3. Data protection officer

3.1. Claranet GmbH and Claranet Addon GmbH

The data protection officer of the controller is:

RA Ivaylo Ivanov

Hanauer Landstraße 196

60314 Frankfurt

Tel.: +49 69 40 80 18 – 0

Fax: +49 69 40 80 18 – 100

E-mail: datenschutz@claranet.de

If you have any questions or suggestions regarding data protection, please contact our data protection officer directly at any time.

3.2. Claranet Switzerland GmbH

We have not appointed a data protection officer for Claranet Switzerland GmbH. However, if you have any questions about data protection at Claranet Switzerland GmbH, please feel free to contact datenschutz@claranet.de.

4. Data processing in Switzerland

4.1. Basis for data processing

Claranet may process data belonging to Swiss customers. This data is processed in accordance with the Federal Act on Data Protection (Data Protection Act, DSG) and, in certain areas, the European Union's General Data Protection Regulation (GDPR).

The Swiss Data Protection Act (DSG) does not generally require a legal basis for data processing to be specified. Unless explicit reference is made to the DSG, the legal bases referred to in this privacy policy relate to data processing for which the GDPR applies.

4.2. Definitions

The terminology used in the Swiss Data Protection Act and in the GDPR, some of which differs (e.g. personal data/personal information; processing), is used uniformly in this privacy policy. In specific cases, it should be understood in accordance with the relevant legal provisions.

We use the term "data" in this privacy policy as synonymous with "personal data" or "personal information".

5. Affiliated companies

Individual tasks for the provision of our services are performed by various affiliated companies of the Claranet Group. The affiliated companies of Claranet DACH consist of the following companies:

Claranet GmbH	Claranet Addon GmbH	Claranet Holding GmbH	Claranet Switzerland GmbH
Hanauer Landstraße 196	Wolfgang-Brumme-Allee 25	Hanauer Landstraße 196	Gate 55, Flughofstrasse 55
D-60314 Frankfurt am Main	D-71034 Böblingen	D-60314 Frankfurt am Main	CH-8152 Glattbrugg
Phone: +49 (0)69 - 40 80 18 0	Phone: +49 (0)7031 - 71 77 0	Phone: +49 (0)69 - 40 80 18 0	Phone: +41 (0)44 - 842 77 11
Fax: +49 (0)69 - 40 80 18 100	Fax: +49 (0)7031 - 71 77 10	Fax: +49 (0)69 - 40 80 18 100	
E-mail: de-info@claranet.com	E-mail: de-info@claranet.com	E-mail: de-info@claranet.com	E-mail: ch-info@claranet.com

Your data will be transferred within the group of companies within the scope of a group-wide contractual relationship in accordance with Art. 28 GDPR, resp. Art. 9 DSG, or on the basis of an agreement on joint responsibility in accordance with Art. 26 GDPR, resp. DSG. Claranet thus ensures that your personal data is adequately protected even when it is received by the affiliated company.

5.1. Joint controllers pursuant to Art. 26 (2) GDPR

In order to save resources and be more effective, Claranet uses, among other things, shared databases to manage its address data (Salesforce) and a shared ticket system (Servicenow).

Within the framework of the existing joint data protection responsibility, Claranet has laid down which affiliated company fulfils which obligations under the GDPR. Individual data sets have been assigned to a particular company that is responsible for processing the respective personal data. This applies in particular to the exercise of the rights of data subjects and the fulfilment of information obligations in accordance with Articles 13 and 14 GDPR.

You can exercise your data protection rights centrally at: **datenschutz@claranet.de**.

6. Claranet websites and portals

Claranet automatically collects and stores information in server log files that your browser leaves behind when you visit our websites and portals.

The information we collect and use for debugging includes the Internet Protocol (IP) address that connects your device to the Internet, as well as information about your device and connection to the Internet, such as your operating system, browser type, version and number, and the time of server access.

The most important data we store in the server log files is summarised below:

- IP address of the accessing device
- Date and time of the server request
- Page requested
- Browser type/version
- Operating system used

The legal basis for processing the IP address is Art. 6 (1) (f) GDPR, resp. Art. 31 (1) DSG. Our legitimate interest follows from the purposes of data collection listed below. At this point, we would like to point out that it is not possible to draw any direct conclusions about your identity from the data collected, nor do we do so.

We use the IP address of your device, and the other data listed above for the following purposes:

- To ensure a smooth connection,
- Ensuring the convenient use of our website/application and portals,
- Evaluating system security and stability.

The data is stored for a period of up to 30 days and is then automatically deleted.

This data is stored on our web servers in Germany and the United Kingdom and used for trouble-shooting and error correction if necessary. This data is not combined with other data sources.

6.1. Cookies and tracking technologies

6.1.1. Why does Claranet use cookies?

The use of cookies enables us to optimise our website and other communication measures, tailor them to your individual preferences and achieve a high level of user-friendliness. We can also address you on third-party websites.

Cookies are small text files that are stored on your device and saved by your browser. Cookies do not cause any damage to your device and do not contain viruses. They serve to make our website more user-friendly, effective and secure.

6.1.2. Information about the cookies used by Claranet

Like almost all professional websites, our websites and portals use cookies, i.e. tiny files that are downloaded to your device to make the website available and to improve your user experience. In this section, we would like to inform you about what information the cookies collect, how we use them and why we sometimes need to store these cookies. We will also tell you how you can prevent these cookies from being stored; however, this may restrict or prevent certain features of our website.

By law, we are allowed to store cookies on your device. Under EU and EEA law, we are allowed to do this without your consent if the cookies are essential for the operation of our website. For all other types of cookies, we require your consent in the EU and EEA. We handle this in the same way for instances where Swiss data protection law applies, even if this is not strictly required by Swiss law.

We use cookies for a variety of reasons, which are explained below. Unfortunately, in most cases, there are no industry standard options for disabling cookies without completely disabling the functions and features they add to this website.

Our websites use different types of cookies, including so-called third-party cookies, which are placed when you use integrated third-party services, such as videos or map views.

If these cookies are necessary to ensure the proper functioning of our website ("Type A"), their use is based on Art. 6 (1) (f) GDPR, resp. Art. 31 (1) DSG. Our interest in operating our website is to be regarded as legitimate within the meaning of the aforementioned provision. In all other cases, we ask for your consent (in accordance with Art. 6 (1) (a) GDPR and § 25 TDDDG, resp. Art. 30 (f) DSG) to allow us to set further cookies (statistical cookies, functional cookies, marketing cookies). Without your consent, only necessary cookies will be set. Details on the tools used by Claranet to manage cookie consent and on the option to revoke consent can be found in sections 6.1.5 and 6.1.6.

6.1.3. How can I disable cookies?

When you use our website, we initially only set "necessary cookies" that are required for the functionality of our website. Further cookies are only set with your consent. However, you can also view our website without cookies. This may result in functional restrictions.

Most browsers automatically accept cookies. You can prevent cookies from being stored on your device by selecting the "do not accept cookies" option in your browser settings. You can delete cookies that have already been set at any time in your device's browser. You can find the procedure for the most common browsers under the following links:

- **Mozilla Firefox**
- **Google Chrome**
- **Microsoft Edge**
- **APPLE SAFARI**

Please refer to the user manual of your browser or device manufacturer to find out how this works on your specific device.

6.1.4. We divide cookies into the following categories

In addition to so-called session cookies, which are automatically deleted at the end of your visit to our website, we also use permanent cookies for statistical purposes, which remain on your device. These contain an individual user ID, which our web analytics service Google Analytics uses to recognise you when you visit our website again.

Type A - Necessary cookies

Necessary cookies are required for the functionality of our website and cannot be disabled. **Necessary cookies are preselected and cannot be deactivated!**

Type B - Statistics cookies

Statistical cookies help us understand how visitors to our website interact with our web pages. We use this information to optimise and further develop our offering.

Type C – Functional cookies

Functional cookies store individual settings (functions) that you have saved regarding the behaviour or appearance of a website, e.g. your preferred language or the region you are in. These cookies enable us to improve the convenience and performance of websites and to provide various functions. They may be set by our external service providers or our own website.

Functional cookies are activated after consent has been given and are the basis for the delivery of various functionalities. If you do not accept this category, certain functions may not be available or only be available to a limited extent, such as:

- Online application forms (e.g. Onlyfy by XING)

Type D – Marketing cookies

Marketing cookies may be used by Claranet and third-party providers to track visitors to websites. The intention is to present content and advertisements that are relevant and interesting to the individual user.

Unclassified

Unclassified cookies are cookies that could not be assigned to any of the previous categories at this time.

6.1.5. Cookie management with CookieFirst

Our website uses the consent management tool "CookieFirst" to obtain your consent to the use of cookies on your device.

A banner that opens when you first visit our website or, alternatively, by clicking on the red fingerprint button at the bottom left of the website, allows you to adjust your personal settings, learn more about the cookies used or withdraw your consent for the future.

The company that provides this technology is Digital Data Solutions BV, Plantage Middenlaan 42a, 1018DH, Amsterdam, Netherlands (Cookie First). When you click on our cookie banner, the following information is passed on to CookieFirst:

- Your consent status or withdrawal of consent
- Your IP address
- Information about your device
- Date and time of your visit to our website

CookieFirst stores cookies in your browser to assign your consent status; this information is also passed on to CookieFirst as proof of consent. The data is stored until you request us to delete it or the purpose for which it was stored no longer applies. CookieFirst uses cookies that are necessary to obtain the legally required consent for the use of certain technologies. The legal basis for this is Article 6 (1) (f) GDPR, resp. Article 31 (1) DSG.

For the purpose and scope of data collection and the further processing and use of the data by CookieFirst, further information as well as your rights in this regard and setting options for the protection of your privacy, please refer to the privacy policy of CookieFirst at **https://cookiefirst.com/legal/privacy-policy/**.

6.1.6. Cookie management with Evalanche

Regardless of the use of the cookie banner described in section 6.1.5 and your consent to cookies in accordance with section 6.1.5, you allow Claranet to record your user behaviour through the personalised evaluation of your data (mailing and personalised web tracking) via selected forms on our websites (see section 7), so that we can tailor our communications to your specific interests.

The forms are provided, user consent to personal tracking is managed and the corresponding cookies are set by the marketing software "Evalanche" of the SC-Networks GmbH.

SC-Networks GmbH is a German company based at Würmstraße 4, D-82319 Starnberg. Data is transferred to SC-Networks GmbH on the basis of a data processing agreement concluded between Claranet and SC-Networks. The data transferred to SC-Networks GmbH is processed exclusively on systems in Germany.

The following cookie is set by Evalanche when a user has consented to personal tracking:

Name: ewafut

- Type: D (marketing cookie)
- Purpose: Personal tracking of Claranet form users (website visits and clicks on websites)
- Domain name: claranet.evalanche.cloud
- Retention period: 2 years
- Data collected: Date and time, type (type of object that set the cookie: E-mail, web form, website, SmartLink or WebTouchPoint), browser referrer, user agent, object IDs, optional object-dependent information

Data processing, in particular the setting of cookies, is carried out with your consent on the basis of Art. 6 (1) (a) GDPR, resp. Art. 30 (f) GDPR.

You can revoke your tracking consent at any time with future effect. To revoke your consent, simply send an E-mail to widerruf@claranet.de or, if you are accessing our website from Switzerland, to ch-widerruf@claranet.com, or click on the "deactivate tracking" link in any E-mail.

By deactivating marketing cookies in the cookie banner on our website, you can prevent your website visits and clicks from being recorded in a personalised manner.

For information on the purpose and scope of data collection and the further processing and use of data by SC-Networks GmbH, further information and your rights in this regard and settings options for protecting your privacy, please refer to the privacy policy of SC-Networks GmbH at https://www.sc-networks.de/datenschutz/.

6.1.7. Additional tracking technologies: Evalanche

In addition, Evalanche uses personalised link IDs (tracking links) in HTML on the basis of your consented to personal tracking (as described in the section7)

- personalised link IDs (tracking links) and
- integrated miniature graphics (tracking pixels)

which allow us to recognise which links have been clicked, whether the mailing has been opened and how long it was open. As part of this retrieval, technical information such as information about the browser and system, the end device and mail client used by the user, and the time of retrieval are also collected.

You can revoke your tracking consent at any time with future effect. To revoke your consent, simply send an E-mail towiderruf@claranet.de or, if you are using our website from Switzerland, to ch-widerruf@claranet.com, or click on the "deactivate tracking" link in any E-mail.

The data stored for the purpose of advertising contact by post, E-mail or telephone will be stored until revoked and then deleted from both our server and the servers at Evalanche.

6.1.8. Other tracking technologies: Matomo

We use the open source web analytics service Matomo on our website. Matomo uses technologies that enable cross-page recognition of visitors for the purpose of analysing user behaviour (device fingerprinting and cookies). The information collected by Matomo about the use of the website is stored on a server in the Claranet data centre in Frankfurt. Your IP address is anonymised before storage so that it can no longer be clearly assigned to you.

Matomo helps us to collect and analyse data about how visitors use our website. This enables us, among other things, to find out when which pages were viewed and from which region. We also collect various other data (e.g. anonymised IP address, referrer, browsers and operating systems used) and can measure whether our website visitors perform certain actions (e.g. clicks, downloads, etc.).

The legal basis for this processing is our legitimate interest pursuant to Art. 6 (1) (f) GDPR, resp. Art. 31 (1) DSG, or, for the setting of cookies, your consent pursuant to Art. 6 (1) (a) GDPR and § 25 (1) TDDDG, resp. Art. 30 (f) DSG. The website operator has a legitimate interest in the anonymous analysis of user behaviour in order to optimise both its website and its advertising.

You can prevent the use of cookies by adjusting your browser software settings or at any time via the "Cookie settings" link on our website.

We also offer you the option of opting out of the analysis process on our website. To do this, you must follow the link below. This will set a cookie on your system that signals to our system not to store your usage data: **https://www.claranet.com/de/matomo-opt-out**

6.2. Online advertising

6.2.1. Google Ads/Remarketing

We use Google Ads, an advertising service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("Google"), to draw attention to our attractive offers on external websites with the help of advertising media (so-called Google Ads).

With the remarketing function, we can display advertisements to users of our websites on other websites within the Google advertising network that are tailored to their interests based on the data from the advertising campaign. To do this, we analyse user interaction on our websites. This allows us to determine how successful an advertising campaign was.

These advertising materials are delivered by Google via so-called "ad servers". For this purpose, we use ad server cookies, which store certain parameters for measuring success,

- such as the display of ads
- or clicks by users.

If you access our website via a Google advertisement, Google Ads will store a cookie on your device. These cookies usually expire after 30 days and are not intended to identify you personally.

The unique cookie ID usually stores the following analysis values

- the unique cookie ID,
- number of ad impressions per placement (frequency),
- last impression (relevant for post-view conversions)
- and opt-out information (indicating that the user no longer wishes to be targeted).

These cookies enable Google to recognise your internet browser. If you visit certain pages of our website and the cookie has not yet expired, Google and we can recognise that you have clicked on the ad and are redirected to this page. A different cookie is assigned to each Ads customer. Cookies cannot therefore be tracked across the websites of Ads customers. We ourselves do not collect or process any personal data in the advertising measures mentioned above. We only receive statistical evaluations from Google. These evaluations enable us to identify which of the advertising measures used are particularly effective. We do not receive any further data from the use of the advertising media; in particular, we cannot identify users on the basis of this information.

Due to the marketing tools used, your browser automatically establishes a direct connection to Google's server. We have no influence on the scope and further use of the data collected by Google through the use of this tool and therefore inform you according to our state of knowledge.

Through the integration of Ads Conversion, Google receives the information that you have accessed the corresponding part of our website or clicked on one of our advertisements. If you are registered with a Google service, Google can associate the visit with your account. Even if you are not registered with Google or have not logged in, it is possible that the provider may obtain and store your IP address.

Your data may be transferred to the United States. Google and Claranet GmbH have concluded the "EU Standard Contractual Clauses" and are therefore obliged to comply with European data protection guidelines. Data processing, in particular the setting of cookies, is carried out with your consent on the basis of Art. 6 (1) (a) GDPR, resp. Art. 30 (f) DSG.

You can withdraw your consent at any time without affecting the lawfulness of the processing carried out on the basis of your consent until withdrawal. Further information and Google's privacy policy can be found at: https://www.google.de/policies/privacy/.

6.2.2. Google Analytics and Google Tag Manager

For the purpose of designing our website in line with your needs and continuously optimising it, we use Google Analytics, a web analytics service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("Google"), on the basis of Art. 6 (1) (a) GDPR, resp. Art. 30 (f) GDPR. In this context, anonymised usage profiles are created, and cookies are used. The information collected about your use of this website, such as

- Browser type/version
- Operating system

- Device type
- Screen resolution
- Referrer URL (the previously visited page)
- IP address (anonymised)
- Time of server request
- Location data (anonymised)
- Client ID
- Campaign-related data from Google Ads campaigns

are transferred to a Google server in the USA and stored there. Data is transferred to Google in the USA on the basis of a data processing agreement between Claranet and Google and the conclusion of standard contractual clauses.

Google will use this information to evaluate your use of the website, to compile reports on website activity for us as the website operator and to provide other services related to website activity and internet usage. Google may also transfer this information to third parties if required by law or if third parties process this data on behalf of Google. The IP addresses are anonymised so that they cannot be traced back to individual users (so-called IP masking). The IP address of users within member states of the EU or other EEA member states is shortened by Google.

Your user data collected in this way will be automatically deleted after 14 months.

You can prevent the storage of cookies by adjusting your browser software settings accordingly; however, we would like to point out that in this case you may not be able to use all functions of our websites and portals to their full extent.

You can also prevent the collection of data generated by the cookie and related to your use of the website and the processing of this data by Google by downloading and installing the browser plugin available at the following link:

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

Or you can select "do not accept cookies" in the privacy settings of your browser.

Google Tag Manager is used on our website to implement Google Analytics. Google Tag Manager is a solution from Google Ireland Limited that allows companies to manage website tags via an interface. Google Tag Manager is a cookie-free domain that does not collect any personal data. Google Tag Manager triggers other tags, which may in turn collect data. Google Tag Manager does not access this data. If the user has disabled tracking at the domain or cookie level, this setting will remain in effect for all tracking tags implemented with Google Tag Manager.

Further information on data protection in connection with Google Analytics can be found on the Google Analytics website. Alternatively, you can change or revoke your individual cookie settings via our consent management tool. You can access the tool under the "Service Links" tab in the "Cookie Settings" sub-item at the bottom of our website.

6.2.3. Google Maps

Our websites use links that lead to Google Maps. Google Maps is operated by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. When using Google Maps, Google also collects, processes and uses data about the use of the map functions by visitors. We have no influence on the processing and use of the data by Google and therefore cannot accept any responsibility for this. The purpose and scope of the data collection and the further processing and use of the data by Google, as well as your rights in this regard and settings options for protecting your privacy, can be found in Google's privacy policy at **https://policies.google.com/privacy?hl=de.**

6.2.4. YouTube

We have integrated YouTube videos into the online offering on our websites. These videos are stored on our channel at http://www.youtube.com and can be played directly from our websites.

YouTube is a video portal operated by YouTube LLC, 901 Cherry Ave., 94066 San Bruno, CA, USA, and a subsidiary of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

A connection from our websites to YouTube is only established when you click on the video preview image on one of the websites. YouTube videos are integrated by us in "extended privacy mode": No data about you as a user is transferred to YouTube as long as you do not play the videos. Only once you play the videos will the data mentioned in the next paragraph be transferred. We have no influence on this data transfer.

By clicking on a video, YouTube receives the information that you have accessed the corresponding subpage of our website. In addition, the data mentioned in section 6.2 of this policy is transmitted. This occurs regardless of whether YouTube provides a user account through which you are logged in or whether no user account exists. If you are logged in to Google, your data will be assigned directly to your account. If you do not want this association with your YouTube profile, you must log out before activating the button. YouTube stores your data in usage profiles and uses them for advertising, market research and/or the needs-based design of its website. Such evaluation is carried out in particular (even for users who are not logged in) to provide needs-based advertising and to inform other users of the social network about your activities on our website. You have the right to object to the creation of these user profiles, whereby you must contact YouTube to exercise this right.

Further information on the purpose and scope of data collection and its processing by YouTube can be found in the privacy policy. There you will also find further information on your rights and settings options for protecting your privacy: **https://www.google.de/intl/de/policies/privacy**.

Google also processes your personal data in the United States and has submitted to the EU-U.S. Data Privacy Framework: **https://www.dataprivacyframework.gov**.

6.2.5. Microsoft Advertising

We use Microsoft Advertising on our website, an online advertising service provided by Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA.

Microsoft Advertising enables us to display advertisements on the Bing search engine and within the Microsoft Advertising Network, and to measure their performance. When users visit our website via a Microsoft advertisement, a cookie is placed on the user's device.

Data processed

The cookie is not used for personal identification; however, the following data, amongst others, may be processed:

- IP address (truncated)
- Device and browser information
- Time and duration of the website visit
- Referrer URL
- Interactions on our website (e.g. page views, conversions)

We receive only aggregated statistical reports from Microsoft, which we use to analyse the effectiveness of our advertising campaigns. We are unable to establish a direct link to any individual.

Purpose of processing

The data is processed for the following purposes:

- Audience measurement
- Conversion tracking
- Optimisation of our online advertising
- Efficient operation of our website

Legal basis

Data is processed on the basis of your consent in accordance with Article 6 (1) (a) of the GDPR, resp. Article 30 (f) DSG, provided that this consent was given via our cookie consent tool (CookieFirst).

Data transfers to third countries

Microsoft may also transfer data to the USA. Microsoft is certified under the EU-US Data Privacy Framework. In addition, Microsoft implements appropriate safeguards in accordance with Articles 44 et seq. of the GDPR (e.g. standard contractual clauses).

Withdrawal and objection

You can withdraw or amend your consent at any time via our cookie consent tool.

Furthermore, you can disable personalised advertising from Microsoft via the following link: **https://account.microsoft.com/privacy/ad-settings**

Further information on data processing by Microsoft can be found in Microsoft's privacy statement: **https://privacy.microsoft.com/de-de/privacystatement**

6.3. LinkedIn Conversion Tracking and Retargeting Technology

For marketing purposes, we use conversion tracking technology and the retargeting function of LinkedIn Ireland Unlimited Company, based at Wilton Place, Dublin 2, Ireland.

This technology enables us to display personalised advertisements to users of our websites on LinkedIn. The LinkedIn Insight tag on our websites is a simple JavaScript code that places a cookie in your web browser that is valid for 120 days.

It is also possible to create anonymous but detailed campaign reports and information about website interaction.

You can find more information about data collection and use, as well as your options and rights to protect your privacy, in LinkedIn's privacy policy at https://www.linkedin.com/legal/privacy-policy.

You can deactivate data collection at any time at the following link: **https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out**. The opt-out cookie is only valid in the browser you are using and only for our websites and is stored on your device. If you delete the cookies in this browser, you will have to set the opt-out cookie again.

The legal basis for the use of LinkedIn technology, the performance of statistical surveys and analyses, the display of personalised advertising and the evaluation of your use of our website is our legitimate interest pursuant to Art. 6 (1) (f) GDPR, resp. Art. 31 (1) DSG.

6.4. Trustpilot company profile and review management

We maintain a company profile on the Trustpilot review platform. The provider is Trustpilot A/S, Pilestræde 58, 5th floor, DK-1112 Copenhagen, Denmark (hereinafter “Trustpilot”).

Purpose of processing

We use Trustpilot solely for the purposes of reputation management and quality assurance for our services. Specifically, this involves creating and maintaining a publicly accessible company profile on trustpilot.com, receiving automated notifications when new reviews are posted, and drafting and publishing responses to customer reviews.

Data processed

As part of this usage, we process the content of reviews that users leave about our company on trustpilot.com, as well as our own responses to these reviews. Trustpilot also sends us email notifications that may contain the content of the review and, where applicable, the reviewer’s username. We do not ourselves transfer any personal data relating to our customers to Trustpilot as part of this usage.

Legal basis

The processing of your data is carried out on the basis of the consent you have given to Trustpilot in accordance with Article 6(1)(a) of the GDPR, resp. Article 30 (f) DSG, by which you have consented to the disclosure of your personal data to us as the company which you have written a review about (see the section ‘Your personal data shared with independent third-party services,

websites and businesses' in the End User Privacy Policy, **https://corporate.trustpilot.com/legal/for-reviewers/privacy-policy-end-user/mar-2026**).

Data processing agreement and data transfers to third countries

We have entered into a data processing agreement with Trustpilot in accordance with Article 28 of the GDPR. Trustpilot A/S is based in Denmark and is therefore established in an EU Member State. No data transfers to countries outside the EEA takes place in connection with our use of Trustpilot. For further information on data processing by Trustpilot, please see Trustpilot's privacy policy: **https://de.legal.trustpilot.com/for-reviewers/end-user-privacy-terms**.

6.5. Live chat (Lime Connect)

On our websites **https://www.claranet.com/de**, **https://www.claranet.com/ch** **and** **https://training.claranet.com** you can use a messaging service to send us specific enquiries or to get more information. For this purpose, we use a chat service provided by Lime Connect (Userlike) GmbH, Im Mediapark 8, 50670 Cologne, Germany. You can use the chat service to communicate with our staff almost in real time. When you start the chat, the following personal data will be processed:

- Date and time of usage,
- Browsertype/ -version,
- IP address,
- Operating system,
- URL oft he prior website,
- Amount of data sent
- Chat status (new, on hold, closed)
- Chat transcript
- Duration of chat

If you decide that you would like to continue your discussion with our staff beyond the chat, you may do so by voluntarily providing further personal data. The nature and scope of this data depend largely on your enquiry or the issue you describe to us. The processing of all this data serves to provide you with a quick and efficient means of contact and thus to improve our customer service. The following data may potentially be processed:

- Email address
- Surname, first name
- Theme of chat
- Phone number

We assure you that we will use the data received solely for the purpose of responding to your enquiry via the chat. Data processing is carried out with your consent in accordance with Article 6(1)(a) of the GDPR, resp. Article 30(f) DSG, or based on our legitimate interest pursuant to Article 6(1)(f) of the GDPR, resp. Article 31(1) DSG.

Your data will be deleted as soon as it is no longer required to fulfil the purpose for which it was collected, latest one year after the conclusion of a conversation, unless we are legally obliged to

retain it for a longer period. A conversation is deemed to have ended when it is clear from the circumstances that the matter in question has been fully resolved and no further contact is desired.

When you visit one of our websites, the chat widget is loaded from AWS CloudFront in the form of a JavaScript file. Technically speaking, the chat widget consists of the source code that runs on your computer and enables the chat function. To this end, your IP address is transmitted to Amazon Web Services EMEA SARL, 38 avenue John F. Kennedy, L-1855 Luxembourg (AWS). The use of the chat widget is based on the legitimate interest of the provider, pursuant to Article 6(1)(f) of the GDPR, resp. Article 31(1) DSG, in not operating a CDN itself.

6.6. SalesViewer

For marketing, market research and optimisation purposes, we use SalesViewer technology from SalesViewer GmbH on our websites to collect and store company-related data.

For this purpose, a JavaScript-based tracking code is used to collect company-related data and information about its use.

The following data is collected and processed:

- Name, origin and industry of the visiting company,
- Source/referrer of the visiting company
- Keyword
- Visitor behaviour (e.g. (sub)pages visited, time of visit and duration of visit)

The data collected using this technology is encrypted using a non-reversible one-way function (known as hashing). The data is immediately pseudonymised and is not used to personally identify visitors to this website. The online identifiers collected are compared by SalesViewer GmbH with a database limited to company-related data and made available to Claranet.

The data stored within the scope of SalesViewer will be deleted as soon as it is no longer required for its intended purpose and there are no legal obligations to retain it.

You can object to the collection and storage of data at any time with future effect by clicking on this link **https://www.salesviewer.com/opt-out** to prevent SalesViewer from collecting data on this website in the future. An opt-out cookie will be stored on your device for this website. If you delete your cookies in this browser, you will need to click on this link again.

The legal basis for the use of SalesViewer for marketing, market research and optimisation purposes, as well as for identifying interested companies in order to optimise our services and website, is our legitimate interest pursuant to Art. 6 (1) (f) GDPR, resp. Art. 31 (1) DSG.

7. Form entries

If no forms are provided on our website, you can contact us via a telephone number or an E-mail address (see section 15).

If forms are provided on our website, they are provided by the marketing software "Evalanche" from SC-Networks GmbH (for details about the company, see section 6.1.6).

In the case of event, download and newsletter forms, a double opt-in (DOI) registration process is implemented via the software to verify your E-mail address: You will receive an E-mail to the address you entered in the form and confirm the address by clicking on a corresponding DOI link. The process is logged for evidence purposes in accordance with legal requirements. This includes storing the time of registration and confirmation.

The data is transferred from the Evalanche software to our CRM system Salesforce (see section 9) via the API middleware "HubEngine", a SaaS solution from Marini Systems GmbH. Marini System GmbH is a German company based at Kaiserstrasse 57, D-60329 Frankfurt. Since the transferred data is stored in HubEngine in individual cases (HubEngine operation in debug mode) and Marini Systems GmbH may potentially gain access (upon request by Claranet for support purposes), a data processing agreement has been concluded between Claranet and Marini Systems GmbH. The transferred data is processed exclusively on systems in Germany.

7.1. Enquiry form

You can send us enquiries via a form on our website.

In order to respond to your enquiry as specifically as possible, we collect personal data in this case. This is usually:

- Company
- Title
- First name and surname
- Position
- Phone number
- E-mail
- System requirements
- Time of form submission

Use of the contact form requires that you provide at least your first name, surname, E-mail address and phone number, as we will otherwise be unable to respond to your enquiry. You can also send us enquiries at any time by E-mail. In this case, we will collect the data you provide in your E-mail in addition to your E-mail address. Any further data you provide or send us by E-mail is voluntary.

We assure you that we will use the data received exclusively for the purpose of responding to your enquiry. The legal basis for data processing is Art. 6 (1) (b) GDPR, resp. Art. 31 (2).(a) DSG, insofar as we take pre-contractual measures (e.g. the preparation and transmission of an offer) at your request and process your data for this purpose. The legal basis for data processing outside such pre-contractual measures is Art. 6 (1) (f) GDPR, resp. or Art. 31 (1) DSG. We have a legitimate interest in processing your enquiry properly.

Your data will be deleted as soon as it is no longer necessary to achieve the purpose for which it was collected, but at the latest one year after the end of a conversation, **unless we are legally obliged to store it for longer.** The conversation is ended when it can be inferred from the circumstances that the matter in question has been conclusively clarified and no further contact is desired.

7.2. White paper download

You can download white papers, studies and eBooks from the websites of Claranet GmbH and Claranet Switzerland GmbH. The download is free of charge. You provide us with the following personal data using the online form provided:

- First name and surname
- E-mail
- Phone number
- System requirements
- Time of form submission

Any additional information you provide (title, preferred language, position and company) is voluntary.

By submitting such a form, you consent to Claranet using the personal data you provide in this form for advertising purposes. This is based on your consent in accordance with Art. 6 (1) (a) GDPR, resp. Art. 30 f. DSG.

In our download forms, you additionally allow Claranet to record your user behaviour through the personalised evaluation of your data so that we can tailor our communication measures to your specific interests. For more information, please refer to section 6.1.6 and 6.1.7 .

You can revoke your consent to the storage and use of your personal data, which you have given us for advertising purposes in connection with the white paper download, as well as your consent to personal tracking at any time with effect for the future. To withdraw your consent, simply send an E-mail to widerruf@claranet.de or, if you are using our website from Switzerland, to ch-widerruf@claranet.com, or click on the links in each E-mail.

7.3. Registration for local events

On our website, you have the opportunity to register for numerous Claranet events. Participation in our events is free of charge. By using the online form provided, you transmit the following personal data to Claranet:

- First name and surname
- E-mail
- Phone number
- System requirements
- Time of form submission

Any additional information you provide (title, preferred language, position and company) is voluntary.

By submitting this form, you consent to the use of the personal data you provide in this form for advertising purposes by Claranet and, where applicable, by co-organisers. This is based on your consent in accordance with Art. 6 (1) (a) GDPR, resp. Art. 30 f. DSG. If there are co-organisers, all

companies act as independent controllers within the meaning of data protection law. We refer separately to the privacy policies of any co-organisers in the registration form for the event.

In our event forms, you additionally allow Claranet to record your user behaviour through the personalised evaluation of your data so that we can tailor our communication measures to your specific interests. You can find more information on this in section 6.1.6 and 6.1.7.

You can revoke your consent to the storage and use of your personal data that you have provided to us for advertising purposes in connection with your participation in the event, as well as your consent to personal tracking at any time with effect for the future. To withdraw your consent, simply send an E-mail to widerruf@claranet.de or, if you are using our website from Switzerland, to ch-widerruf@claranet.com, or click on the links in each E-mail.

Claranet may take photographs and video recordings of the events. This image material will be used on our website, on the social media channels listed in section 12 and in company presentations for public relations and to showcase Claranet's activities. Further information can be found in our data protection information on event participation:

https://www.claranet.com/de/assets/2025-08-claranet_datenschutzhinweise_eventteilnahme_0.pdf

7.4. Webinar registration

You can register for Claranet webinars on our website. Participation in our webinars is free of charge. By using the online form provided, you will transmit the following personal data to Claranet:

- First name and surname
- E-mail
- Phone number
- System requirements
- Time of form submission

Any additional information you provide (title, preferred language, position and company) is voluntary.

By submitting this form, you consent to Claranet using the personal data you provide in this form for advertising purposes. This is based on your consent in accordance with Art. 6 (1) (a) GDPR, resp. Art. 30 f. DSG.

In our webinar forms, you additionally allow Claranet to record your user behaviour through the personalised evaluation of your data so that we can tailor our communication measures to your specific interests. For more information, please refer to section 6.1.6 and 6.1.7 .

You can revoke your consent to the storage and use of your personal data, which you have provided to us for advertising purposes in the context of your webinar registration, as well as your consent to personal tracking at any time with effect for the future. To withdraw your consent, simply send an E-mail to widerruf@claranet.de or, if you are using our website from Switzerland, to ch-widerruf@claranet.com, or click on the links in each E-mail.

We use the Microsoft application Teams to conduct the webinar. The personal data you provide will therefore be transferred to systems operated by Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA.

Further information on Microsoft's data protection can be found in the section 15.1.

7.5. Booking a seminar

If you book a course with us via the websites of Claranet GmbH and/or Claranet Addon GmbH and/or Claranet Switzerland GmbH, there are three options in the shopping cart for how you can proceed:

- You can download the shopping cart,
- You can request a non-binding quote or
- place a binding order.

The following data is required in the mandatory fields for quotations and orders:

- Surname
- First name
- Company
- Street or PO Box
- Postcode, town
- E-mail
- Phone number

In addition, we receive information about the course booked (title, date, price, further details on voucher codes, etc.) in our system.

This data is collected

- in order to identify you as our customer;
- to process, fulfil and handle your order;
- to correspond with you;
- for invoicing;
- to process any liability claims that may arise, as well as to assert any claims against you;
- to ensure the technical administration of our website;
- to manage our customer data.

To complete your order, you must agree to the privacy policy. Optionally, you can also give your consent to receive advertising so that you can be informed about further offers tailored to your training and our services in the future.

After you have submitted your order, our system will generate a PDF containing the data from the form and your shopping cart, which will be sent to you by E-mail for confirmation and to our team, who will then process your order.

We assure you that we will use the data received exclusively for the purpose of planning and conducting the booked training. The legal basis for data processing is Art. 6 (1) (b) GDPR, resp. Art. 31 (2) (a) DSG, insofar as we take pre-contractual measures at your request (e.g. the preparation and transmission of an offer) and process your data for this purpose. The legal basis for data processing outside such pre-contractual measures is Art. 6 (1) (f) GDPR, resp. Art. 31 (1) DSG. We have a legitimate interest in processing your request properly.

Your data will be deleted as soon as it is no longer necessary to achieve the purpose for which it was collected. The conversation is then terminated when it can be inferred from the circumstances that the matter in question has been conclusively clarified and no further contact is desired.

8. Whistleblower System

Claranet uses the “Vispato” whistleblowing system provided by Vispato GmbH. Vispato can be accessed via the Claranet In-house Portal or via the following address:

https://claranet-dach.vispato.com/

Through the whistleblowing system, whistleblowers can contact the ombudspersons appointed by Claranet either directly or indirectly.

The whistleblowing system can be used, in particular, to report suspected breaches of the law and other serious violations of rules.

This includes, in particular, reports of suspected breaches that have been or are being committed as a result of conduct by Claranet or its employees:

Matters relevant to criminal law

- White-collar crimes such as corruption, fraud or embezzlement
- Breaches of competition law
- Crimes such as industrial espionage and corporate extortion
- Offences such as workplace violence, bullying and bossing
- Offences such as undeclared work and unauthorised secondary employment
- Offences such as theft and embezzlement
- Criminal offences such as accounting fraud, continued pay fraud, expenses fraud, insurance fraud and working hours fraud
- Violations relating to the protection of human rights

Civil law and compliance-related matters

- Disclosure of trade and business secrets

- Carrying out eavesdropping
- Breaches of internal compliance regulations, guidelines and policies
- Breaches of contractual obligations, in particular NDAs, AVVs or similar agreements

Where the Claranet whistleblowing system is used, no information that could identify the whistleblower is passed on to the designated contacts. Furthermore, the system can process the report in such a way that it is further anonymised. This may involve removing duplicate punctuation marks and standardising the spelling of words. All information transmitted via the system is end-to-end encrypted. Where technically possible and chosen by the whistleblower, reports may be submitted anonymously. Reports received anonymously are also processed within the scope of what is practically and legally feasible.

Within the whistleblowing system, personal data is processed exclusively to the extent necessary and in compliance with applicable data protection regulations. The identity of the whistleblower, the data subjects and any other persons named in a report must be treated as confidential. Access to such information is granted exclusively to persons authorised to process it, insofar as this is necessary for the performance of their duties. Protected information shall only be disclosed to the extent required or permitted by law. Where legally permissible, the data subject shall be informed in advance of any necessary disclosure.

Unless there are longer statutory retention obligations or overriding legitimate interests, the data will generally be deleted three years after the conclusion of the proceedings, in accordance with the statutory requirements.

The right of whistleblowers to contact external reporting bodies remains unaffected.

By using the Claranet whistleblower system, you consent to Claranet using the personal data you have provided via the Claranet whistleblower system. This is based on your consent in accordance with Article 6(1)(a) of the GDPR, resp. Article 30(f) DSG.

You may withdraw your consent to the storage and use of your personal data, which you have given us by using the Claranet whistleblowing system, at any time with effect for the future. To withdraw your consent, simply use the form provided for your report in the whistleblowing system.

9. Customer data

We process personal data if this is necessary for the fulfilment of a contract or for the initiation of a contract between your company and Claranet. This data usually includes the name of your company, address and, if applicable, your E-mail address, fax number, payment details, etc.

In order to fulfil the contract, it is necessary to process the name and address of the company that wishes to conclude a contract with us. If this information contains personal data, the provision of this data is mandatory. Without this data, it would not be possible to assign contracts to your company, issue invoices, send postal communications, dispatch any products owed and, if necessary, assert legitimate claims. Failure to provide the name, telephone number and E-mail address of at least one specific contact person will make communication and contract processing more difficult.

Furthermore, we pass on personal data to our affiliates, companies within the Claranet Group and subcontractors for the purpose of fulfilling the contract. This is necessary, for example, to ensure uninterrupted support, to have on-site installations carried out by a service provider at your premises, to issue SSL certificates, to monitor performance, to filter spam, to order hardware or to register domains, etc.

In addition, the following data may be collected and stored in individual cases: title, academic title, job title, mobile phone number, etc.

This data is transferred to affiliated companies of the Claranet Group, such as, but not limited to, Claranet Group Ltd., based in the United Kingdom (see section 5), as well as to other external service providers such as ServiceNow UK Ltd., in the United Kingdom and the Netherlands, for billing and order fulfilment purposes.

The privacy policy of "ServiceNow" can be found at **https://www.servicenow.com/privacy-statement.html**. ServiceNow acts as a data processor for Claranet and acts exclusively in accordance with Claranet's instructions. Claranet has entered into a corresponding data processing agreement with ServiceNow.

In addition, we store the contact details provided during the conclusion of the contract (e.g. first name, last name and E-mail address) in systems operated by Salesforce.com EMEA Limited, Floor 26, Salesforce Tower, 110 Bishopsgate, London, EC2N 4AY, United Kingdom ("SFDC") for customer relationship management purposes. The data transferred to Salesforce is stored in systems in Germany and France. Salesforce acts as a processor for Claranet and acts exclusively in accordance with Claranet's instructions. Claranet has concluded a corresponding data processing agreement with Salesforce.

In order to send existing customer information by E-mail, our customers' contact details are transferred to the marketing software "Evalanche" from "SC-Networks GmbH" (see section 6.1.6) using the API middleware "HubEngine" from Marini Systems GmbH (see section 7).

Claranet uses the authentication service Auth0 by Okta, Okta Inc, 100 First Street, San Francisco, California 94105, USA, for your login, e.g. to Claranet Online. For this purpose, the following user data, among other things, is transferred to Auth0 by Okta: First name and surname, user name, password, E-mail address, IP address, log files (consisting of time stamp, user name, IP address and identification token), location data of the internet service provider. The transfer of personal data to the external identity providers named in this section, whose servers are located in the USA or another EU country, serves the performance of the contract and is based on Art. 6 (1) (b) GDPR, resp. Art. 31 (2) (a) DSG. Further information on Okta Inc. can be found at **https://www.okta.com/privacy-policy/** and **https://auth0.com/web-terms**.

We use Checkmk GmbH products to monitor our customers' IT infrastructure. This monitoring covers, amongst other things, the following aspects of our customers' systems: CPU utilisation, RAM usage, hard drives/storage (I/O, RAID status, etc.), and hardware status. As part of this monitoring, various data is collected, e.g. name and email address. The transfer of personal data to Checkmk GmbH serves the performance of the contract and is based on Art. 6 (1) (b) GDPR, resp. Art. 31

(2) (a) DSG. Further information on Checkmk GmbH can be found at **https://checkmk.com/de/datenschutzhinweis**.

In support cases, products from VMware International Unlimited Company are used. As part of the support provided, various data is collected, e.g. name and email address. The transfer of personal data to VMware International Unlimited Company serves the performance of the contract and is based on Art. 6 (1) (b) GDPR, resp. Art. 31 (2) (a) DSG. Further information on VMware International Unlimited Company can be found at **https://www.broadcom.com/company/legal/privacy**.

The legal basis for this is Article 6 (1) (b) GDPR, resp. Article 31 (2) (a) DSG, i.e. you provide us with the data on the basis of the contractual relationship between you and us. In order to process your E-mail address, we are also obliged to send you an electronic order confirmation in accordance with a provision in the German Civil Code (BGB) if you use our website from Germany (Article 6 (1) (c) GDPR, resp. Article 31 (2) (a) DSG). We store the data collected for contract processing until the expiry of the statutory limitations or possible contractual warranty and guarantee rights. After this period has expired, we will retain the information required by commercial and tax law reasons relating to the contractual relationship for the periods specified by law. For this period (usually ten years from the conclusion of the contract), the data will only be processed again in the event of an audit by tax authorities.

To activate multi-factor authentication (MFA) when using the Auth0 by Okta authentication service for Claranet Online, for example, you will also be offered the "Claranet Authenticator" app (use of this app is optional). Claranet Authenticator is a simple and secure mobile authentication app developed and operated by Claranet Limited, 110 High Holborn, London, England, WC1V 6JS. The app can be downloaded from the Apple App Store and Google Play Store. If you decide to use the app as a second factor, you will receive a push notification when you request a second factor. The app notifies the identity provider (Auth0) to reconfirm the authenticity of the first factor. Requests back to the web server (origin) are encrypted with TLS by default.

When using the app, the following user data, among other things, is transmitted to Claranet Limited: IP address, approximate location (via the IP address), user ID, device ID (via APNS token or Android Firebase Push), diagnostic data (log data). By using the app, you agree to the privacy policy of Claranet Limited. The legal basis for the processing of business contact data is Art. 6 (1) (a) GDPR and § 25 II No. 2 TDDDG, resp. Art. 31 (2) (a) DSG. The purpose of the processing is to generate a second factor for authentication. Further information can be found at: **https://www.claranet.com/uk/privacy-policy.**

We also process your E-mail address in order to send you direct marketing for similar goods or services from Claranet outside the scope of your specific consent, e.g. via our newsletter.

You can object to this use of your E-mail address at any time with future effect. You can object by sending an E-Mail to widerruf@claranet.de or, if you are using our website from Switzerland, ch-widerruf@claranet.com, or by clicking the "Unsubscribe" link in any E-mail. You will not incur any costs other than the transmission costs according to the basic rates. If you object, your E-mail address will be blocked for further advertising data processing.

10. Usage of AI systems

As part of the services we provide to you, we may use AI systems. The AI systems we use undergo a verification process carried out by us prior to their deployment.

AI systems are used in particular for handling support cases, pre-contractual measures and to support our service operations. In this context, your personal data, such as your name, contact details (in particular your email address), contract data relating to individuals and ticket data relating to individuals, may be uploaded into the AI systems and processed by them. We bind the providers of the AI systems not to use the data uploaded into the systems for training purposes.

The following AI systems are used in particular at Claranet:

- **Microsoft Foundry**
- **Claude.ai**
- **Microsoft CoPilot**
- **Gemini for Google Cloud**

The legal basis for the input of your data into the AI systems is Article 6(1)(b) of the GDPR, resp. Article 31(2)(a) DSG, insofar as we take pre-contractual measures (e.g. the preparation and submission of a quotation) in response to your enquiry and process your data for this purpose. The legal basis for data processing outside the scope of such pre-contractual measures is Article 6(1)(f) of the GDPR, resp. Article 31(1) DSG. We have a legitimate interest in processing your enquiry properly and efficiently. The processing of your personal data by the providers of the AI systems is carried out on the basis of the data processing agreements we have concluded with them.

11. Ordering our newsletter

You can subscribe to the Claranet newsletter on the websites of Claranet GmbH and Claranet Switzerland GmbH. When you subscribe, we collect personal data from you, such as your name and E-mail address. You give us your consent to do this when you register. We use this data exclusively to personalise and execute our E-mail mailings. To prevent misuse of E-mail addresses, subscribers must confirm their subscription to the newsletter in an automated process via E-mail (double opt-in). Newsletter subscriptions are logged so that we can verify the registration process in accordance with legal requirements. This includes storing the time of registration and confirmation.

The standard newsletter is sent up to twelve times a year.In the newsletter subscription form, you allow Claranet to record your user behaviour through the personalised evaluation of your data so that we can tailor our communication measures to your specific interests. Further information on this can be found in sections 6.1.6 and 6.1.7 . On the basis of your consent and if we can derive specific interests from your user behaviour, you will receive, in addition to the newsletter, occasional standalone mailings on topics in which you have expressed an interest.

You can revoke your consent to the storage and use of your personal data, which you have given us for advertising purposes in the context of your newsletter registration, as well as

your consent to personal tracking at any time with effect for the future. To withdraw your consent, simply send an E-mail to widerruf@claranet.de or, if you are using our website from Switzerland, to ch-widerruf@claranet.com, or click on the links in each E-mail.

The personal data transmitted to us when you register for the newsletter will be stored in systems operated by Salesforce.com EMEA Limited, Floor 26, Salesforce Tower, 110 Bishopsgate, London, EC2N 4AY, United Kingdom ("SFDC") for customer relationship management purposes. The data transferred to Salesforce is stored in systems in Germany and France. Salesforce acts as a processor for Claranet and acts exclusively in accordance with Claranet's instructions. Claranet has entered into an appropriate data processing agreement with Salesforce.

The newsletter form, the double opt-in registration process described above and the dispatch of our mailings are provided by the marketing software "Evalanche" from SC-Networks GmbH (for details about the company, see section 6.1.6). The data is transferred to our CRM system Salesforce (see section 9) via the API middleware "HubEngine" from Marini Systems GmbH (see section 7).

The legal basis for sending our newsletters is Art. 6 (1) (a) GDPR and § 7 (2) No. 3, or (3) UWG (German Unfair Competition Act), resp. Art. 31 (2) (a) DSG. The legal basis for the use of the mailing service provider SC-Networks GmbH, the performance of statistical surveys and analyses, and the logging of the registration process is our legitimate interest pursuant to Art. 6 (1) (f) GDPR, resp. Art. 31 (1) GDPR. Our interest is directed to using a user-friendly and secure newsletter system that serves both our business interests and meets the expectations of users.

12. Online presence on social media

In addition to our websites, we also maintain online presences on social media such as Facebook, Instagram, Meet Up, Xing, LinkedIn, X (formerly Twitter), Twitch, Medium and YouTube. You can access these via the corresponding buttons on our websites.

We would like to point out that you use these pages and their functions at your own risk. This applies in particular to the use of interactive functions (e.g. commenting, sharing, rating).

When you visit such a presence, personal data may be transmitted to the provider of the social media platform. The provider of the social media platform collects and processes, among other things, your IP address, the type of processor and browser version used, including plug-ins, and, if applicable, further information.

The data collected about you in this context is usually processed by the social media provider for market research and advertising purposes and may be transferred to countries outside the European Union. For example, usage profiles can be created based on your usage behaviour and the interests that can be derived from it. These usage profiles are used, among other things, to place advertisements within and outside the social media platform that correspond to your presumed interests. For this purpose, cookies are usually placed on your device, in which your usage behaviour and interests are stored.

If you are logged in with your personal user account for the respective medium while visiting such a website, this medium can assign the visit to your account.

The purpose and scope of the data collection and the further processing and use of the data by the provider of the respective social media platform, as well as your rights in this regard and setting options (in particular opt-out options) for protecting your privacy, can be found in the respective privacy policy of the respective social media platform at:

- Facebook: **https://de-de.facebook.com/about/privacy**
- Instagram: **https://help.instagram.com/519522125107875**
- Meet Up: **https://www.meetup.com/de-DE/privacy/**
- Xing: **https://www.xing.com/privacy**
- LinkedIn: **https://www.linkedin.com/legal/privacy-policy**
- X (formerly Twitter): **https://twitter.com/de/privacy**
- Twitch: **https://www.twitch.tv/p/de-de/legal/privacy-notice/**
- YouTube: **https://www.google.de/intl/de/policies/privacy/**
- Medium: **https://policy.medium.com/medium-privacy-policy-f03bf92035c9**

As the operator of the respective online presence, we use the statistics and analysis tools provided by the providers for the purpose of designing our online presence and advertising measures on the respective online platforms in line with requirements and for their ongoing optimisation.

In addition, we use the Canadian social media management platform Hootsuite Inc. (111 East 5th Avenue, 3rd Floor, Vancouver, British Columbia, VST 4L1) to manage some of the online presences listed above, which enables the planning, analysis and publication of posts.

Data transfers to the European Union and Canada are based on an adequacy decision. This provides for the continued validity of the adequacy decisions already issued (Art. 46 (5) sentence 2, 45 GDPR, resp. Art. 16, 17 DSG), so that data transfers are possible on this basis. In addition, we have concluded a data processing agreement with Hootsuite Inc. that includes the EU standard contractual clauses.

Hootsuite itself uses American service providers in the USA, which means that data is also transferred to the USA: **https://www.hootsuite.com/legal/subprocessor-list**. Further information about Hootsuite and the use of data can be found at: **https://www.hootsuite.com/de/legal/privacy**.

13. Applying to Claranet

By submitting your application via our applicant management system, by post or by E-mail, you consent to us storing and using your application documents for the application process. This is done on the basis of your consent in accordance with Art. 6 (1) (b) GDPR and § 26 (1) BDSG, resp. Art. 31 (2) (a) DSG. Your data will be treated as strictly confidential. Personal data will only be made available to employees of Claranet affiliated companies involved in the application process:

Claranet GmbH	Claranet Addon GmbH	Claranet Holding GmbH	Claranet Switzerland GmbH
Hanauer Landstraße 196	Wolfgang-Brumme-Allee 25	Hanauer Landstraße 196	Gate 55, Flughofstrasse 55
D-60314 Frankfurt	D-71034 Böblingen	D-60314 Frankfurt	CH-8152 Glattbrugg
Phone: +49 (0)69 - 40 80 18 0	Phone: +49 (7031) 71 77 0	Phone: +49 (0)69 - 40 80 18 0	Phone: +41 44 842 77 11
Fax: +49 (0)69 - 40 80 18 100	Fax: +49 (7031) 71 77 10	Fax: +49 (0)69 - 40 80 18 100	
E-mail: de-info@claranet.com	E-mail: de-info@claranet.com	E-mail: de-info@claranet.com	E-mail: ch-info@claranet.com

Your data will be deleted six months after notification of the rejection decision if no employment or training relationship is established and there are no other legitimate interests that prevent deletion (e.g. obligation to provide evidence in proceedings under the General Equal Treatment Act (Gleichbehandlungsgesetz, AGG) or under the Swiss Federal Act on Gender Equality (Equality Act, GIG)) preclude deletion.

Depending on the job advertisement, the controller may change during the application process.

With regard to job advertisements posted by Claranet GmbH, you can revoke your consent to the storage and processing of your application data at any time with future effect by sending an E-mail to widerruf@claranet.de or by post to our address Claranet GmbH, Hanauer Landstraße 196, D-60314 Frankfurt am Main, Germany, with the reference "Data protection", or by fax to +49 69 40 80 18 - 100.

With regard to job advertisements posted by Claranet Holding GmbH, you can revoke your consent to the storage and processing of your application data at any time with future effect by sending an E-mail to widerruf@claranet.de or by post to our address Claranet Holding GmbH, Hanauer Landstraße 196, D-60314 Frankfurt am Main, Germany, with the reference "Data protection", or by fax to +49 69 40 80 18 - 100, and have the data deleted.

With regard to job advertisements posted by Claranet Addon GmbH, you can revoke your consent to the storage and processing of your application data at any time with future effect by sending an E-mail to widerruf@claranet.de or by post to our address Claranet Addon GmbH, Wolfgang-Brumme-Allee 25, D-71034 Böblingen, Germany, with the reference "Data protection", or by fax to +49 69 40 80 18 - 100, and have the data deleted.

With regard to job advertisements posted by Claranet Switzerland GmbH, you can revoke your consent to the storage and processing of your application data at any time with future effect by sending an E-mail to ch-widerruf@claranet.com or by post to our address Claranet

Switzerland GmbH, Gate 55, Flughofstrasse 55, 8152 Glattbrugg, Switzerland, keyword "Data protection", and have the data deleted.

We will then delete all data transmitted to us in the course of the application process, unless we are entitled and/or obliged to retain it due to legal regulations.

In all cases, we use the applicant management software Onlyfy by XING (Prescreen Classic) from New Work SE, Strandkai 1, 20457 Hamburg, to process your application. New Work SE and Claranet are joint controllers within the meaning of Article 26 of the GDPR in relation to their collaboration on Claranet's corporate account, as they jointly determine the purposes and means of processing. As part of their joint responsibility under data protection law, New Work SE and Claranet have agreed which of them will fulfil which obligations under the GDPR. Your data will be stored via Onlyfy in data centres in Europe and is subject to the provisions of the GDPR and the DSG. If you submit your application by E-mail as part of the application process, the data will be automatically entered into our Onlyfy by XING (Prescreen Classic) applicant management software.

For every application received via Onlyfy, a search for a matching Xing account is automatically carried out using the candidate's E-mail address. In doing so, we access data that is clearly publicly available. The legal basis for processing data is, in addition to Art. 9 (2) (e) GDPR, resp. Art. 30 f. DSG, our legitimate interest pursuant to Art. 6 (1) (f) GDPR, resp. Art. 31 (1) DSG in recruiting suitable employees.

Further information on the processing of personal data in this context can be found in Onlyfy's privacy policy at **https://onlyfy.com/de/datenschutz/**.

As part of our recruitment process, we conduct a behavioural and aptitude assessment in collaboration with Thomas International Limited. During this process, you will provide information and enter data into Thomas International Limited's systems. This is done on the basis of your consent in accordance with Article 6(1)(a) of the GDPR, resp. Article 30(f) DSG. Further information on the processing of personal data in this context can be found in Thomas International Limited's privacy policy at **https://www.thomas.co/de/node/736**.

Once you have successfully completed all internal processes in the application process at Claranet and your employment is imminent, we will check your first name and surname against so-called "EU terror lists" before sending you the employment contract. We are required to do this under European anti-terrorism regulations 2580/2001 and 881/2002 to ensure that no funds or other economic resources are made available for terrorist purposes. We use the "EasyCompliance" software from Siemssen Consulting GmbH for this comparison. We have concluded a data processing agreement with Siemssen Consulting GmbH for this purpose.

14. Employee recruitment

In order to find qualified applicants, we use active sourcing with the help of LinkedIn Recruiter and search for suitable candidates on the LinkedIn social network. In doing so, we access publicly available personal data that meets certain filter criteria. We make a note of candidates who are of interest to us via LinkedIn Recruiter and contact them via their LinkedIn account. If necessary, we

share the candidate's profile with colleagues in our recruiting team. No copy of the profile is created; instead, reference is made to the data available on LinkedIn.

We process applicant data in this context for the purpose of targeted applicant contact and on the basis of our legitimate interest in recruiting suitable employees in accordance with Art. 6 (1) (f) GDPR, resp. Art. 31 (1) DSG.

15. Communication and collaboration with Claranet

15.1. By E-mail and collaboration platforms

Claranet uses Microsoft Office 365 for sending and receiving E-mails (Exchange Online) and for collaboration within the company and with external parties. This includes applications such as Calendar (scheduling), Outlook, OneDrive, SharePoint, Viva Engage, Teams, To-Do, Office Online, Dynamics 365 Customer Voice, etc. When you send an E-mail to Claranet or work together on documents, all personal data you provide will be transferred to systems operated by Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA. The data will not be transferred to the USA, but will remain in Europe. The data will be used exclusively for the processing of communication and collaboration. The legal basis for the processing of data transmitted in the course of sending an E-mail is Art. 6 (1) (f) GDPR, resp. Art. 31 (1) DSG. If the E-mail communication is aimed at concluding a contract, Art. 6 (1) (b) GDPR, resp. Art. 31 (2) (a) DSG is also the legal basis for processing. In the event of contact being made by E-mail, this also constitutes the necessary legitimate interest in the processing of the data.

After the end of the respective communication or collaboration, we will retain the information required by commercial and tax law relating to the contractual relationship for the periods specified by law. For this period (usually ten years from the conclusion of the contract), the data will only be processed again in the event of an audit by the tax authorities.

You have the right to object to the storage of your personal data at any time with future effect by sending an E-mail to widerruf@claranet.de or, if you are using our website from Switzerland, to ch-widerruf@claranet.com. In such a case, communication cannot be continued. All personal data stored in the course of communication will be deleted in this case, unless deletion is prevented by any statutory retention periods.

15.2. By phone

Claranet uses a VoIP phone system from CNT AG, Ludwig-Erhard-Allee 20, 76131 Karlsruhe, Germany, for its locations in Frankfurt am Main, Cologne and Glattbrugg, Switzerland. When you call, your phone number, first name and surname are stored in the CNT AG portals. The purpose of processing this data is to process your phone enquiry and to contact you in order to respond to your enquiry. The legal basis for the processing of your personal data transmitted in this context is Art. 6 (1) (f) GDPR, resp. Art. 31 (1) DSG. Our legitimate interest lies in giving you the opportunity to contact us at any time and in being able to respond to your enquiry. The data will be stored for as long as is necessary to process your phone enquiry. This is the case when your enquiry has been finally processed.

You can object to the storage of your personal data at any time with future effect by sending an E-mail to widerruf@claranet.de or, if you are using our website from Switzerland, to ch-widerruf@claranet.com. In such a case, communication cannot be continued. All personal data stored in the course of communication will be deleted in this case, unless deletion is prevented by any statutory retention periods.

For its locations in Böblingen, Walldorf and Cologne, Claranet uses a VoIP phone system provided by Telekom Deutschland GmbH, Landgrabenweg 149, 53227 Bonn. When you call, your telephone number, first name and surname are stored in the Telekom portals. The purpose of processing this data is to process your phone enquiry and to contact you to respond to your enquiry. The legal basis for the processing of your personal data transmitted in this context is Art. 6 (1) (f) GDPR, resp. Art. 31 (1) DSG. Our legitimate interest lies in giving you the opportunity to contact us at any time and in being able to respond to your enquiry. The data will be stored for as long as is necessary to process your phone enquiry. This is the case when your enquiry has been finally processed.

You can object to the storage of your personal data at any time with future effect by sending an E-mail to widerruf@claranet.de or, if you are using from Switzerland, to ch-widerruf@claranet.com. In such a case, communication cannot be continued. All personal data stored in the course of communication will be deleted in this case, unless deletion is prevented by any statutory retention periods.

15.3. Via messenger

During the delivery phase of a customer setup, Claranet uses the web-based instant messaging service Slack to improve collaboration with the customer. For this purpose, the first name and surname, user name, avatar and E-mail address of a profile are usually transmitted to Slack Technologies, 500 Howard Street, San Francisco, CA 94105, USA. Slack Technologies' servers are located in the USA. Data is transferred on the basis of standard contractual clauses of the EU Commission. This communication serves the purpose of fulfilling the contract and is based on Art. 6 (1) (b) GDPR, resp. Art. 31 (2) (a) DSG. We store the data collected for contract processing until the expiry of the statutory or possible contractual warranty and guarantee rights. After this period has expired, we will retain the information required under commercial and tax law relating to the contractual relationship for the periods specified by law. For this period (usually ten years from the conclusion of the contract), the data will only be processed again in the event of an audit by the tax authorities.

15.4. Via online appointment booking

Claranet provides you with a link to online appointment booking (e.g. "Book an appointment online" or "Talk to our expert") via various channels: in the e-mail signature of our sales staff at Claranet GmbH, Claranet Addon GmbH and Claranet Switzerland GmbH, on our websites and in marketing campaigns and posts on social networks (e.g. LinkedIn). Regardless of the channel through which you access the link, the booking itself always takes place in Microsoft Bookings; no data is transferred to the respective social network as a result of the booking. The statements in section 12 also apply to data processing on the platform on which you find the link. Via this link, you can book a meeting yourself in an available time slot of the respective contact person. For

this purpose, we use the Microsoft Bookings service ("Bookings with me"), a component of Microsoft 365 of Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA, described in section 15.1.

The following data is collected when booking:

- First name and surname,
- E-mail address,
- requested appointment including your time zone,
- voluntary information you provide in the message field (e.g. your request, company or telephone number).

We use this data exclusively to arrange, confirm and hold the appointment you have booked and to send the meeting invitation and any reminders. The appointment is entered in the calendar of the booked contact person. The data is not used for any other purpose, in particular not for advertising purposes. As with the other Microsoft 365 services, the data remains in Europe.

The legal basis for data processing is Art. 6 (1) (b) GDPR, resp. Art. 31 (2) (a) DSG, insofar as the appointment booking serves the initiation or performance of a contractual relationship. Otherwise, the legal basis is Art. 6 (1) (f) GDPR, resp. Art. 31 (1) DSG. We have a legitimate interest in enabling you to arrange appointments easily and quickly. If you book an appointment with Claranet Switzerland GmbH, the processing of your personal data is governed by the Swiss DSG; the statements in section 4 also apply.

Your data will be deleted as soon as it is no longer required for the purpose for which it was collected and there are no statutory retention obligations to the contrary. If you cancel the appointment or it does not take place, we will delete the booking data once the purpose no longer applies.

15.5. Via Docusign

Claranet uses the "Docusign" software from DocuSign, Inc., 221 Main Street #800, San Francisco, CA 94105, USA, for the electronic signing of contracts and documents. In order to ensure and document a legally compliant signature and a valid conclusion of contract, the following data is processed, depending on the respective form of signature:

- Name and E-mail address, as well as job title of the persons concerned, if applicable
- The (qualified) digital signature of the person concerned
- Documentation of activities and status changes, including date and time (e.g. dispatch, signature, rejection, forwarding, cancellation)
- Type of signature and authentication method used
- Metadata on the transaction, document history and subject
- System information, such as IP addresses and other online identifiers and location data

Access to the personal data contained in the documents to be signed is strictly limited to the parties involved (contracting parties). Docusign has no access to this data, as it is encrypted against Docusign.

The use of Docusign serves Claranet's legitimate interest in formally simplifying the process of legally valid document signing through the use of electronic signatures. The legal basis is Art. 6 (1) (f) GDPR, resp. Art. 31 (1) DSG.

Personal data is stored and processed on servers in the EU. Insofar as DocuSign, Inc., based in the USA, obtains access to personal data, the transfer is based on the standard contractual clauses of the EU Commission. Your personal data will be deleted as soon as the purpose for which it was collected has been fulfilled and there are no legal retention periods that prevent this. The data processed by Docusign is automatically deleted by the system 30 days after the document has been completed.

Further information on the data processed in the context of a transaction using DocuSign and on data protection at DocuSign can be found at: **https://www.docusign.com/privacy**

15.6. Through satisfaction surveys

To ensure that our services and offers are tailored to your needs, we may use the E-mail address you provide to our customer service or when registering for an event for customer satisfaction surveys, unless you have expressly objected to this use of your E-mail address.

15.6.1. Surveys via Microsoft Dynamics 365 Customer Voice

We use Microsoft Dynamics 365 Customer Voice, a service provided by Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA, to conduct the surveys listed below. If you participate in the survey, Customer Voice will use this information to create reports that enable us to analyse customer satisfaction.

The IP address is processed for the technical provision of the survey. We do not store or use it for any other purpose. Microsoft may process the IP address as part of its logging; please refer to Microsoft's privacy policy for more information.

The use of the Dynamics 365 Customer Voice service is in our legitimate interest (Art. 6 (1) (f) GDPR, resp. Art. 31 (1) DSG), as we wish to optimise our offering with this service. You can view Microsoft's privacy policy here: **https://privacy.microsoft.com/de-de/privacystatement**.

Further information on data processing within the scope of Microsoft 365 can be found in section 15.1 of this privacy policy.

15.6.1.1. After Claranet Events (anonymised)

After Claranet Events, we may ask you for your opinion by means of an anonymous satisfaction survey. Your IP address will not be stored permanently and your data will not be evaluated on a personal level. The legal basis for this processing is Art. 6 (1) (f) GDPR, resp. Art. 31 (1) DSG. We have a legitimate interest in continuously improving our services based on your feedback and in analysing and optimising our business operations. To this end, you may be asked by E-

mail to participate in a customer satisfaction survey when you visit or attend a Claranet event. Participation is voluntary. The results are used internally for analysis and as a basis for improving our range of services. The data will be deleted once the purpose for which it was collected has been fulfilled.

15.6.1.2. General existing customer surveys (not anonymised)

We may also ask for your opinion by means of a non-anonymised satisfaction survey. Participation is also voluntary. If you participate in a survey, we ask you to provide your first name, surname and company name. We process this data exclusively for the purpose of improving our services, quality assurance and product development. The legal basis for this processing is Art. 6 (1) (f) GDPR, resp. Art. 31 (1) DSG. We have a legitimate interest in continuously improving our services based on your evaluation and in analysing and optimising our economic operations. The results are used internally for analysis and as a basis for improving our range of services. The data will be deleted once the purpose for which it was collected has been fulfilled.

15.6.1.3. Feedback form after successful completion of training (not anonymised)

After completing a training course at Claranet, participants will receive a link to a non-anonymous feedback form via E-mail on the last day of the course. Participation is voluntary. This feedback form is generated using Microsoft's Dynamics 365 Customer Voice tool. If you participate in this survey, we ask you to provide your first name, last name and company name. You will be asked for your opinion on our training, the performance of our trainer and our portfolio. We process this data exclusively for the purpose of improving our services, quality assurance and product enhancement. The legal basis for this processing is Art. 6 (1) (f) GDPR, resp. Art. 31 (1) DSG. The results will be used internally for analysis and as a basis for improving our range of services. The data will be deleted once the purpose for which it was collected has been fulfilled.

You can object to this use of your personal data at any time with future effect by sending an E-mail to widerruf@claranet.de or, if you are using our website from Switzerland, to ch-widerruf@claranet.com. This will incur no costs other than the transmission costs according to the basic rates.

15.6.2. Surveys via Servicenow after processing an incident tickets

After closing an incident ticket, we ask for your opinion by means of a satisfaction survey. Our service provider Servicenow (see section 9) collects your IP address, name, customer name, incident number and your details in its backend. The legal basis for this processing is Art. 6 (1) (f) GDPR, resp. Art. 31 (1) DSG. We have a legitimate interest in continuously improving our services based on your evaluation and in analysing and optimising our economic operations. For this purpose, you will be asked, for example, to complete an incident ticket from Claranet by E-mail and to participate in a customer satisfaction survey. Participation is voluntary. The results are used internally for analysis and as a basis for improving our range of services. The data will be deleted once the purpose for which it was collected has been fulfilled.

16. Room rental

At Claranet Addon GmbH and Claranet Switzerland GmbH, you can also rent individual training rooms for your own purposes. For this purpose, the following data will be collected and stored in our systems when you make your request:

- Company
- Title
- First name
- Surname
- E-mail
- Phone number
- Date of rental
- Purpose of rental

The legal basis for this is Article 6 (1) (b) GDPR, resp. Art. 31 (2) (a) DSG, i.e. you provide us with the data on the basis of the contractual relationship between you and us. The data will be stored for the purpose of room rental. If you book through a third-party provider, this will also be stored in the system. In addition, we reserve the right to record the reason for the room rental. All other data you provide us with will be used solely for the purpose of holding your event and will not be used for any other purpose.

17. Visits and appointments at Claranet

When you make an appointment to visit Claranet GmbH, an E-mail (invitation) may be generated from the visitor management system Joan from Visionect d.o.o. so that you receive useful information for your visit (directions, confidentiality agreement, etc.). For this purpose, your personal data such as

- First name and surname,
- E-mail address and company
- Photo for the visitor badge

will be transferred to Visionect d.o.o., Tržaška cesta 118, 1000 Ljubljana, Slovenia. This data also serves as the basis for visitor registration and check-in upon arrival at Claranet's offices. The photo is used exclusively to create the visitor badge and is deleted one year after the end of your last visit.

For meeting room bookings, Claranet uses room calendars in Office 365, which are synchronised with the meeting room booking solution Joan from Visionect d.o.o., Tržaška cesta 118, 1000 Ljubljana, Slovenia (to display room occupancy on the meeting room displays). The personal data used for room bookings is usually

- First name and surname,
- and your E-mail address.

By making an appointment, you declare your consent in accordance with Art. 6 (1) (a) GDPR, resp. Art. 30 f. DSG, to the electronic transfer of your personal data by Claranet to Visionect d.o.o., Tržaška cesta 118, 1000 Ljubljana, Slovenia for the purpose of room booking and visitor management.

Visionect will use this data exclusively for the purpose of room booking and visitor management. Visionect d.o.o. is based in Slovenia and processes the data within the EU; no transfer to a third country takes place in this respect. It will not be passed on to third parties.

You can withdraw your consent at any time with future effect by sending an E-mail to widerruf@claranet.de or by post to Claranet GmbH, Hanauer Landstraße 196, D-60314 Frankfurt am Main, Germany, marked "Data protection", or by fax to +49 69 40 80 18 -100.

18. Data not collected from the data subject

We do not only process personal data that we receive directly from you, but also use our own research and data from third parties for supplementation and validation. In accordance with Art. 14 GDPR, resp. Art. 19 (1) DSG, we would like to inform you below about the sources and categories of data that we use when researching or collecting data from third parties. The legal basis for this is the principle of "accuracy" in Art. 5 (1) of the GDPR, resp. Art. 6 (5) DSG, as well as the protection of our legitimate interests for the purpose of verifying and updating our database and for one-to-one communication in accordance with Art. 6 (1) (f) GDPR, resp. Art. 31 (1) DSG. The data will only be used for the purposes specified in this privacy policy. It will only be used for advertising purposes if we have obtained your consent.

18.1. Dealfront

Claranet uses Dealfront, a service provided by Dealfront Group GmbH, Durlacher Allee 73, D-76131 Karlsruhe, Germany, to validate and supplement its data. For this purpose, Dealfront provides companies with GDPR/DSG-compliant company and contact details, among other things, in order to ensure efficient and legally compliant data processing. The data provided by Dealfront comes from various publicly accessible sources. These include, for example, official commercial register entries, which are enriched by other publicly accessible online data. This online data may come from news portals, blogs and social media networks with a business connection. Further information about Dealfront can be found at **https://www.dealfront.com/de/** and in the privacy policy at **https://www.dealfront.com/de/privacy-notice/.**

19. Your rights

In addition to the right to withdraw your consent given to us, you have the following additional rights if the respective legal requirements are met:

- Right to information about your personal data stored by us in accordance with Art. 15 GDPR, resp. Art. 25 DSG. In particular, you can obtain information about the purposes of processing, the category of personal data, the categories of recipients to whom your data has been or will be disclosed, the planned storage period, and the origin of your data if it was not collected directly from you.

- Right to rectification of inaccurate data or completion of accurate data in accordance with Art. 16 GDPR, resp. Art. 32 (1) DSG.
- Right to erasure of your data stored by us in accordance with Art. 17 GDPR, resp. Art. 32 (2) (c) DSG in conjunction with the relevant Swiss civil law provisions (Art. 28 ZGB, Art. 28a ZGB and Art. 28g-l ZGB), insofar as no statutory or contractual retention periods or other statutory obligations or rights to further storage must be observed.
- Right to restriction of processing of your data pursuant to Art. 18 GDPR or right to object pursuant to Art. 30 GDPR, insofar as the accuracy of the data is disputed by you, the processing is unlawful, but you oppose its erasure; the controller no longer needs the data, but you require it for the assertion, exercise or defence of legal claims or you have objected to the processing pursuant to Art. 21 GDPR, resp. Art. 30 (2) (b) DSG.
- Right to data portability pursuant to Art. 20 GDPR, resp. Art. 28 DSG, i.e. the right to receive selected data stored by us about you in a common, machine-readable format or to request that it be transferred to another controller.
- Right to lodge a complaint with a supervisory authority. As a rule, you can contact the supervisory authority of your usual place of residence or workplace or our company headquarters for this purpose.

Under the conditions of Art. 21 (1) GDPR, resp. Art. 30 (2) (b) DSG, data processing may be objected to for reasons arising from the particular situation of the data subject.

The above general right to object applies to all processing purposes described in this privacy policy that are processed on the basis of Article 6 (1) (f) GDPR, resp. Art. 31 (1) DSG. Unlike the specific right to object to data processing for advertising purposes (see section 9), we are only obliged to implement such a general objection under the GDPR or the DSG if you provide us with reasons of overriding importance (e.g. a possible danger to life or health). In addition, you have the option of contacting the supervisory authority responsible for Claranet, the Hessian Data Protection Officer(s).

20. Recipients outside the EU

With the exception of the processing described in sections 6.2.2, 7.4, 9, 15.3, 15.5 and 15.6, we do not transfer your data to recipients based outside Switzerland, the European Union or the European Economic Area. The processing operations specified in 6.2.2, 7.4, 9, 15.3, 15.5 and 15.6 result in data being transferred to the servers of the service commissioned by us for the purpose of

- Conduct webinars
- Use of Google Analytics
- Authentication (Auth0 by Okta), messenger communication (Slack) and electronic signature (Docusign)
- Analysis of customer satisfaction surveys

These servers are located in the USA. Data is transferred on the basis of standard contractual clauses of the EU Commission.

The processing referred to in section 9 results in data being transferred to the servers of our parent company, Claranet Group Ltd., and to the service commissioned by us for

- billing and order execution.

These servers are located in the United Kingdom. Data is transferred on the basis of so-called EU standard contractual clauses.

21. Further information and notices

Our websites, services and initiatives are constantly evolving. This privacy policy and our terms of use are also subject to change. We reserve the right to amend the privacy policy to reflect changes in the law or changes to the service or data processing. We reserve the right to send you notifications about our current policies from time to time. You should therefore visit our websites regularly and take note of any changes. Unless otherwise specified, the use of all information we have about you is subject to this privacy policy. We assure you that we will only make significant changes to our privacy policy that result in weaker protection of data already received with your consent as the data subject.

Your trust is very important to us. We are therefore happy to answer any questions you may have regarding the processing of your personal data at any time. If you have any questions that are not answered by this privacy policy or if you would like more detailed information on a particular point, please contact our data protection officer by E-mail at datenschutz@claranet.de or by post at Claranet GmbH, Hanauer Landstraße 196, D-60314 Frankfurt am Main, Germany, or Claranet Switzerland GmbH, Gate 55, Flughofstrasse 55, 8152 Glattbrugg, Switzerland, keyword "Data Protection", or by fax to +49 69 40 80 18 - 100.