

# Privacy Policy

## I. Name and address of the data controller

Responsible authority in the sense of the data protection laws is:

**TechProtect GmbH**  
Max-Eyth-Straße 35  
D-71088 Holzgerlingen

Telefon: +49 (0)7031 7632 0  
Telefax: +49 (0)7031 7632 111

E-Mail: info[at]techprotect.de

Thank you for your interest in our company. Data protection is of particular importance to the management of the TechProtect GmbH.

The processing of personal data, such as the name, address, e-mail address or telephone number of a person concerned, is always carried out in accordance with the basic data protection regulation and in accordance with the country-specific data protection regulations applicable to TechProtect GmbH. By means of this data protection declaration, our company would like to inform the public about the type, scope and purpose of the personal data collected, used and processed by us. Furthermore, data subjects will be informed of their rights by means of this data protection declaration.

## II. Use of the Internet pages

### A. Collection of general information

When you access our website, information of a general nature is automatically collected. This information (server log files) includes the type of web browser, the operating system used, the domain name of your Internet service provider and similar information. This is exclusively information which does not allow any conclusions about your person. This information is technically necessary in order to correctly deliver the content you have requested from websites and is mandatory when using the Internet. Anonymous information of this kind is statistically evaluated by us in order to optimize our Internet presence and the technology behind it.

### B. Cookies

Like many other websites, we also use cookies. Cookies are small text files that are transferred from a website server to your hard drive. This automatically provides us

with certain data such as IP address, browser used, operating system via your computer and your connection to the Internet.

Cookies cannot be used to start programs or to transmit viruses to a computer. Based on the information contained in cookies, we can make navigation easier for you and enable the correct display of our web pages.

Under no circumstances will the data we collect be passed on to third parties or linked to personal data without your consent.

Of course, you can also view our website without cookies. Internet browsers are regularly set to accept cookies. You can deactivate the use of cookies at any time via the settings of your browser. Please use the help functions of your Internet browser to find out how you can change these settings. Please note that some features of our website may not work if you have disabled the use of cookies.

## **C. Registration on our website**

When registering to use our personalised services, some personal data is collected, such as name, address, contact and communication data such as telephone number and e-mail address. If you are registered with us, you can access content and services that we only offer to registered users. Registered users also have the option of changing or deleting the data provided during registration at any time if required. Of course, we will also provide you with information about the personal data we have stored about you at any time. We will be pleased to correct or delete them at your request, as long as there are no legal storage obligations to the contrary. To contact us in this context, please use the contact details given at the end of this data protection declaration.

## **D. SSL encoding**

To protect the security of your data during transmission, we use state-of-the-art encryption methods (e.g. SSL) via HTTPS.

## **E. Newsletter**

When registering to receive our newsletter, the data you provide will be used exclusively for this purpose. Subscribers may also be notified by e-mail of circumstances relevant to the service or registration (e.g. changes to the newsletter offer or technical circumstances).

For an efficient registration we need a valid e-mail address. In order to verify that a registration is actually made by the owner of an e-mail address, we use the "double opt-in" procedure. For this purpose we log the order of the newsletter, the sending of a confirmation e-mail and the receipt of the requested answer. Further data will not be collected. The data will be used exclusively for sending the newsletter and will not be passed on to third parties.

You can revoke your agreement to the storage of your personal data and their use for the newsletter dispatch at any time. In each newsletter you will find a corresponding link. You can also unsubscribe directly from this website at any time or inform us of your request by using the contact option at the end of this data protection notice.

## **F. Contact form**

If you contact us by e-mail or contact form, the information you have provided will be stored for the purpose of processing your request and for possible follow-up questions.

## **G. Deletion or blocking of data**

We follow the principles of data avoidance and data economy. We only store your personal data for as long as is necessary to achieve the purposes mentioned here or as provided for by law. After the respective purpose or expiry of these periods, the corresponding data will be blocked or deleted as a matter of routine and in accordance with statutory regulations.

## **H. Use of Google Analytics**

This website uses Google Analytics, a web analysis service of Google Inc. (following: Google). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how users use the site. The information generated by the cookie about your use of this website is usually transferred to a Google server in the USA and stored there. However, due to the activation of IP anonymisation on these websites, your IP address will previously be reduced by Google within member states of the European Union or in other signatory states to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. On behalf of the operator of this website, Google will use this information to evaluate your use of the website, to compile reports on website activities and to provide the website operator with further services associated with website use and Internet use. The IP address transmitted by your browser in the context of Google Analytics is not merged with other Google data.

You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. You can also prevent Google from collecting the data generated by the cookie and relating to your use of the website (including your IP address) and from processing this data by Google by downloading and installing the browser plug-in available under the following link: [Browser add-on to disable Google Analytics](#).

In addition or as an alternative to the browser add-on, you can prevent tracking by Google Analytics on our pages by clicking this [link](#). An opt-out cookie is installed on

your device. This will prevent Google Analytics from collecting data for this website and for this browser in future as long as the cookie remains installed in your browser.

## **I. Google AdWords**

Our website uses Google Conversion Tracking. If you have reached our website via an ad placed by Google, Google Adwords sets a cookie on your computer. The conversion tracking cookie is set when a user clicks on an ad served by Google. These cookies expire after 30 days and are not used for personal identification. If the user visits certain pages of our website and the cookie has not yet expired, we and Google can see that the user has clicked on the ad and has been redirected to this page. Each Google AdWords customer receives a different cookie. Cookies cannot therefore be traced through the websites of AdWords customers. The information collected using the conversion cookie is used to generate conversion statistics for AdWords customers who have opted for conversion tracking. Customers see the total number of users who clicked on their ad and were redirected to a page with a conversion tracking tag. However, you will not receive any information that personally identifies users.

*If you do not wish to participate in tracking, you can refuse the setting of a cookie required for this - for example via browser settings that generally deactivate the automatic setting of cookies or set your browser so that cookies are blocked by the "googleleadservices.com" domain.*

Please note that you may not delete the opt-out cookies as long as you do not wish measurement data to be recorded. If you have deleted all your cookies in your browser, you must set the respective opt-out cookie again.

## **III. Data protection for services for our customers**

As a contractor, we collect and process personal data such as proof of purchase, address and contact data or bank details of customers of our clients. This is done on the basis of a contract for order processing according to Art. 28 DSGVO. We make the collected or processed data exclusively available to the respective client or use this data to fulfil the agreed services. As part of the processing of personal data, we strictly observe a separation of mandates. In accordance with the agreement on order processing, only the respective client is entitled to information on the procedures. We will gladly forward your inquiries.

## **IV. Data protection for applications and in the application procedure**

The controller collects and processes the personal data of applicants for the purpose of processing the application procedure. Processing may also be carried out electronically. This is particularly the case if an applicant sends corresponding application documents to the controller by electronic means, for example by e-mail or via a web form on the website. If the controller concludes an employment contract with an applicant, the data transmitted will be stored for the purpose of processing the employment relationship in compliance with the statutory provisions. If the controller does not conclude an employment contract with the applicant, the application documents shall be automatically deleted four months after notification of the decision of refusal, provided that no other legitimate interests of the controller stand in the way of deletion. Other legitimate interest in this sense is, for example, a burden of proof in proceedings under the General Equal Treatment Act (AGG).

## **V. General information**

### **A. Legal basis of the processing**

For processing operations for which we obtain consent for a specific processing purpose, Art. 6 I lit. a DS-GVO serves as a legal basis for our company. If the processing of personal data is necessary for the performance of a contract to which the data subject is a party, as is the case for example with processing operations necessary for the delivery of goods or the provision of other services or consideration, the processing is based on Art. 6 I lit. b DS-GVO. This also applies to such processing processes that are necessary to carry out pre-contractual measures, for example in connection with enquiries about our products or services. If our company is subject to a legal obligation which requires the processing of personal data, for example to fulfil tax obligations, the processing is based on Art. 6 I lit. c DS-GVO. In rare cases, the processing of personal data may become necessary to protect the vital interests of the data subject or another natural person. This would be the case, for example, if a visitor were injured in our company and his name, age, health insurance data or other vital information had to be passed on to a doctor, a hospital or other third parties. The processing would then be based on Art. 6 I lit. d DS-GVO. Ultimately, processing operations could be based on Art. 6 I lit. f DS-GVO. Processing operations which are not covered by any of the aforementioned legal bases are based on this legal basis if processing is necessary to safeguard a legitimate interest of our company or a third party, provided that the interests, fundamental rights and freedoms of the data subject do not prevail. Such processing procedures are permitted to us in particular because they have been specifically mentioned by the European legislator. In this respect, it took the view that a legitimate interest could be assumed if the person concerned is a customer of the person responsible (recital 47, second sentence, DS-GVO).

## **B. Legitimate interests in the processing pursued by the controller or a third party**

If the processing of personal data is based on Article 6 I lit. f DS-GVO, it is in our legitimate interest to conduct our business for the well-being of all our employees and our shareholders.

## **C. Duration for which the personal data is stored**

The criterion for the duration of the storage of personal data is the respective legal retention period. After the expiry of this period, the corresponding data will be routinely deleted, provided that it is no longer necessary for the fulfilment or initiation of the contract.

## **D. Legal or contractual provisions for the provision of personal data; necessity for the conclusion of the contract; obligation of the data subject to provide the personal data; possible consequences of failure to provide them**

We inform you that the provision of personal data is partly required by law (e.g. tax regulations) or may also result from contractual regulations (e.g. information on the contractual partner). In some cases, it may be necessary for a contract to be concluded if a data subject provides us with personal data which must subsequently be processed by us. For example, the person concerned is obliged to provide us with personal data if our company enters into a contract with him/her. Failure to provide personal data would mean that the contract with the data subject could not be concluded. Prior to the provision of personal data by the data subject, the data subject must contact one of our employees. Our employee will inform the data subject on a case-by-case basis whether the provision of personal data is required by law or contract or required for the conclusion of the contract, whether there is an obligation to provide the personal data and what consequences the failure to provide the personal data would have.

## **E. Existence of automated decision making**

As a responsible company, we do without automatic decision-making or profiling.

## **F. Your rights to information, correction, blocking, deletion and objection**

You have the right to receive information about your personal data stored by us at any time. You also have the right to correct, block or, apart from the prescribed data

storage for business transactions, delete your personal data. Please contact our data protection officer. You will find the contact details at the bottom.

To ensure that data can be locked at any time, this data must be kept in a lock file for control purposes. You can also request the deletion of the data, as far as no legal archiving obligation exists. If such an obligation exists, we will block your data on request.

You can make changes or cancel your consent by notifying us accordingly with effect for the future.

## **G. Your right to complain**

You have the right of appeal to a supervisory authority. For TechProtect GmbH, the State Commissioner for Data Protection and Freedom of Information Baden-Württemberg is the responsible supervisory authority.

(<https://www.baden-wuerttemberg.datenschutz.de> ).

## **H. Changes to our data protection regulations**

We reserve the right to occasionally adapt this data protection declaration so that it always complies with current legal requirements or to implement changes to our services in the data protection declaration, e.g. when introducing new services. The new data protection declaration will then apply for your next visit.

## **I. Questions to the data protection officer**

If you have any questions about data protection, please send us an e-mail or contact our data protection officer directly:

Michael Weinmann, E-Mail: michael.weinmann[at]dsb-office.de, Tel.: +49 173-763 29 62,

*The data protection declaration was created with the [data protection declaration generator of activeMind AG](#) and the [data protection generator of the DGD Deutsche Gesellschaft für Datenschutz GmbH](#) and modified by [Mr. Michael Weinmann](#).*

The privacy policy of the Lenovo Group Ltd and its affiliated group companies ("Lenovo") can be found by clicking on the following link:  
<https://www.lenovo.com/ee/et/privacy/>