

Data protection policy of subreport Verlag Schawe GmbH (As of: 17. April 2020)

subreport Verlag Schawe GmbH, Buchforststr. 1-15, 51101 Cologne, (hereinafter "**sub-report**" or "**we**"), considers the protection of the personal and other confidential data of the users of its website and services (hereinafter collectively referred to as "services") to be of great importance. subreport is obliged to strictly observe all data protection law provisions, in particular those of the EU Data Protection Regulation (GDPR) and the German Federal Data Protection Act (BDSG).

Below, we wish to inform you about the type, scope and purpose of the gathering and processing of personal data of users of the website and the services that are provided online (in detail under: www.subreport.de, blog.subreport.de, www.subreport.com, demo.subreportCAMPUS.de, demo.subreport-ELViS.de, www.subreportCAMPUS.de, www.subreport-ELViS.de) at the push services "subreport", "subreport select" of subreport and the rights to which the user is entitled.

I. General information

1. Data processing controller

The controller as defined in the EU General Data Protection Regulation (GDPR) for all data collection and processing that takes place within the framework of the use of the subreport website is:

subreport Verlag Schawe GmbH
Buchforststraße 1-15
51103 Cologne
Telephone: +49 (0) 221/98578-0
Email: info@subreport.de

2. Data protection officer

You can contact our data protection officer via the following channels:

subreport Verlag Schawe GmbH
FAO the data protection officer
Buchforststraße 1-15
51103 Cologne
Telephone: +49 (0) 221/98578-85
Email: datenschutz@subreport.de

3. What data do we process and from what sources?

We process the personal data that you provide us or personal data that is gathered with for the purpose of using our services within the framework of the use of our website. Further information in this respect can be found in Section II - processing of personal data.

Personal data is all data that can be personally related to the user, for example name, postal address or email address, but also the IP address that is assigned to the user.

4. Purpose of the data processing and legal basis

We process your personal data in compliance with the relevant data protection regulations, in particular the GDPR and the German Federal Data Protection Act (BDSG) for various purposes. As a rule, the following can be considered to be purposes of the processing: Processing

- in order to fulfil contractual obligations (Article 6 Paragraph 1 Letter b GDPR)
- in order to safeguard legitimate interests (Article 6 Paragraph 1 Letter f GDPR)
- in accordance with your consent (Article 6 Paragraph 1 Letter a GDPR) and/or
- due to legal regulations (Article 6 Paragraph 1 Letter c GDPR)

5. Disclosure to third-parties

Service providers engaged by us which act on our behalf (so-called order processors, see Article 4 Number 8 GDPR) may be provided with personal data. We use the following order processors / categories of order processors:

- IT service providers
- As a rule, we do not pass on personal data to third-parties who process personal data under their own responsibility (so-called controllers, see Article 4 Number 7 GDPR).

6. Retention of data

We only process your personal data for the time that is necessary in order to fulfil the respective purpose of the processing.

In addition, we are subject to various storage and documentation obligations under the German Commercial Code (HGB) or the German Tax Code (AO), amongst others. These can last for up to 10 years.

Finally, the storage period is also assessed according to the statutory limitation periods, which can last for up to thirty years, for example in accordance with §§ 195 ff of the German Civil Code (BGB), whereby the regular limitation period is three years.

II. Processing of personal data

1. Gathering of processing of personal data when using the services of subreport

1.1 Core data

Users must register with subreport before they can use our services. During the registration process, subreport gathers the following core data:

For customers:

- Name, address of the user and his or her employer/company
- Title, first name, surname, role/function of the contact person of the user
- Telephone number of the user
- Fax number of the user (voluntary)
- Email address of the user

For companies:

- Name, address of the user and his or her employer/company
- Branch of the employer/company
- Title, first name, surname, role/function of the contact person of the user
- Telephone number of the user
- Fax number of the user (voluntary)
- Email address of the user
- Bank account of the user (only for chargeable services)
- VAT ID number / tax number of the user

1.2 Username, password, signature

subreport allows registered users to use the services alternatively by means of a user ID and password that can be freely chosen by the user, by means of a signature card (qualified signature) or by using a software certificate (advanced signature).

In order to enable the user to access the services, subreport gathers and saves the user's user ID / password or certificate information (serial number, name of the issuer, organisation of the issuer) and also the public signature key.

1.3 Purpose and legal basis

The core data is required for the establishment and implementation, as well as any subsequent alteration of the contractual relationship between subreport and the users. This is pro-

cessed by subreport solely for this purpose. The processing of the user ID, password and signature is necessary in order to perform the contractual relationship between subreport and the user. The legal basis for this processing is the contractual relationship between subreport and the user in relation to the use of the services of subreport (Article 6 Paragraph 1 Letter b GDPR) or the legitimate interest of subreport in providing these services (Article 6 Paragraph 1 Letter f GDPR), to the extent that the relevant data is personal data of employees or representatives acting on behalf of the user.

2. Use data, content of the communication

subreport considers it of great importance that user data sent via the subreport tender platform is guaranteed to be absolutely secure and protected. For this purpose, subreport uses SSL encryption for the transfer of electronic messages via the electronic tender platform in accordance with the latest technological options. The data transfer is currently based on certificate-secured SSL/TLS v1.2 encryption with proof of identity. The transfer takes place with a 2048-bit RSA/SHA 256 key and an encryption depth of 128 bits and meets the standard recommended by the BSI according to IT Basic Protection (TR 02102-2) until 2022 and beyond.

Offers in response to tenders are provided with a qualified or advanced signature on the provider side where necessary and these are encrypted with at least 2048 bits. Only the message recipient can decrypt it again on the client side.

Neither subreport nor other unauthorised third-parties obtain knowledge of the content of such communication. This content is also not saved by subreport.

3. Cookies, provision of the website

3.1 Cookies

In order to guarantee the flawless functioning of our website and to enable the basic function of the services offered online, we only use those cookies that are technically necessary. These are small text tiles, which are saved in or by your Internet browser on your computer system. These necessary cookies save certain settings of the user (for example the shopping basket, language settings or login data). These cookies can be transferred to a site when you access it and therefore enable the user to be assigned. Cookies help simplify the use of Internet sites for the user. All of the cookies used by us are deleted after the end of the browser session, i.e. once you have closed your browser (so-called session cookies).

You can set your browser in such a way that you are informed of the setting of cookies. The technically necessary cookies used by us do not require any consent. Should you not accept cookies, the functionality of our website may be restricted.

The personal data in cookies is processed on the basis of Article 6 Paragraph 1 Letter f GDPR. The purpose of the data processing and our legitimate interest concern the increased functionality of our website.

3.2 Automatic gathering of access data / server logfiles

When you visit our website, the following data record is automatically stored during each visit:

- Name of the Internet provider
- Name of the Internet browser used
- Date and time of the respective access
- IP address
- Name of the accessed file
- Referrer URL (the previously visited site)
- Operating system

The personal data in logfiles is processed on the basis of Article 6 Paragraph 1 Letter f GDPR.

The purpose of the data processing and our legitimate interest concern the simplified administration of our websites and the option of being able to recognise and deal with misuse. The data is deleted, once it is no longer necessary in order to attain the purpose for which it was gathered. This is the case once the respective session has come to an end. In case of the saving of the data in the logfiles, this takes place if and to the extent that this is necessary in order to provide the services (subreport online, subreport CAMPUS and subreport ELViS).

4. Web analysis

4.1 Twitter

Functions of the Twitter service are integrated into our sites. These functions are provided by Twitter Inc, 1355 Market St, Suite 900, San Francisco, CA 94103, USA. By using Twitter and

the “re-tweet” function, the websites visited by you are connected to your Twitter account and made known to other users. During this process, data is also transferred to Twitter.

We wish to point out that as the provider of the sites, we obtain no knowledge of the transferred data and its use by Twitter. Further information in this respect can be found in the data protection policy of Twitter, accessible via the following link: <http://twitter.com/privacy>.

Your data protection settings at Twitter can be altered in the account settings, accessible via the following link: <http://twitter.com/account/settings>

5. Contact form, email contact, newsletter and press distributor

The user has the option of getting in touch with subreport by email or via the contact form provided on the website. During this process, the following data is gathered and transferred to subreport:

In case of contact by email:

- Email address
- Message

When using the contact form:

- Title, first name, surname and company
- Postal address
- Telephone number
- Email address
- Message

And optional:

- Position
- Fax number
- Inclusion in the press distributor
- Subscription to the newsletter
- Participation in events

Should a user make use of this option, the transferred data will be processed in order to respond to the contact query.

The legal basis for the processing of the data which is transferred during a contact query is Article 6 Paragraph 1 Letter f GDPR. The legitimate interest of subreport is represented by the provision of support to customers and responding to queries that are sent to us. Should the purpose of the email contact be the conclusion of a contract relating to the services of subreport, the additional legal basis for the processing is Article 6 Paragraph 1 Letter b GDPR.

Should you subscribe to our newsletter or press distributor, the processing of your data is based on the consent that you issued during the sending in accordance with Article 6 Paragraph 1 Letter a GDPR.

III. Your rights

1. Information, rectification, erasure, restriction of the processing, data portability

Each data subject has the right of information in accordance with Article 15 GDPR, the right of rectification in accordance with Article 16 GDPR, the right of erasure in accordance with Article 17 GDPR, the right to have the processing restricted in accordance with Article 18 GDPR and the right of data portability in accordance with Article 20 GDPR. In order to exercise the rights referred to above, you can get in touch with the points of contact referred in Section I (general information) under 1 and 2.

2. Right of objection in accordance with Article 21 GDPR

For reasons connected to your specific situation, you have the right to raise an objection to the processing of personal data relating to you at any time which takes place in accordance with Article 6 Paragraph 1 Letter f GDPR (data processing on the basis of a legitimate interest). Should you raise an objection, we will no longer process your personal data, unless we can provide proof of mandatory, protectable reasons for the processing which outweigh your interests, rights and freedoms or if the purpose of the processing is the assertion, exercising or defence of legal claims.

Should we process your personal data in order to carry out direct advertising, you have the right to raise an objection at any time against the processing of personal data relating to you for the purposes of such advertising. Should you object to the processing for the purpose of direct advertising, your personal data will no longer be processed for these purposes.

The objection can take place informally and should be addressed to the points of contact referred to in Section I (general information) under 1 and 2.

3. Revocation of consent

Should you have issued us with your consent to the processing of your personal data, you can revoke this consent at any time. The lawfulness of the processing that took place prior to the revocation is not affected by this.

IV. Right to complain to the supervisory authority

In accordance with Article 77 Paragraph 1 GDPR, you have the right to complain to the supervisory authority, should you be of the opinion that the processing of your personal data is not taking place lawfully and breaches the GDPR in particular.

The address of the supervisory authority with jurisdiction for subreport is as follows: Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen, Kavalleriestr. 2-4, 40213 Düsseldorf, Telephone: +49 (0) 211/38424-0, Fax: +49 (0) 211/38424-10, Email: poststelle@ldi.nrw.de.