Privacy Policy Website

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1. Introduction

In the following, we provide information about the collection of personal data when using

- our website https://iot.trasoltec.com
- our profiles in social media.

Personal data is any data that can be related to a specific natural person, such as their name or IP address.

1.1 Contact details

The controller within the meaning of Art. 4 para. 7 EU General Data Protection Regulation (GDPR) is TRASOLTEC GmbH, Kiem-Pauli-Straße 8, Landshut, Germany, email: info@trasoltec.com. We are legally represented by Corinna Bugiel, Alexander Bugiel.

Our data protection officer can be reached via heyData GmbH, Schützenstraße 5, 10117 Berlin, www.heydata.eu , E-Mail: datenschutz@heydata.eu.

1.2 Scope of data processing, processing purposes and legal bases

We detail the scope of data processing, processing purposes and legal bases below. In principle, the following come into consideration as the legal basis for data processing:

- Art. 6 para. 1 s. 1 lit. a GDPR serves as our legal basis for processing operations for which we obtain consent.
- Art. 6 para. 1 s. 1 lit. b GDPR is the legal basis insofar as the processing of personal data is necessary for the performance of a contract, e.g. if a site visitor purchases a product from us or we perform a service for him. This legal basis also applies to processing that is necessary for pre-contractual measures, such as in the case of inquiries about our products or services.
- Art. 6 para. 1 s. 1 lit. c GDPR applies if we fulfill a legal obligation by processing personal data, as may be the case, for example, in tax law.
- Art. 6 para. 1 s. 1 lit. f GDPR serves as the legal basis when we can rely on legitimate interests to process personal data, e.g. for cookies that are necessary for the technical operation of our website.

1.3 Data processing outside the EEA

Insofar as we transfer data to service providers or other third parties outside the EEA, the security of the data during the transfer is guaranteed by adequacy decisions of the EU Commission, insofar as they exist (e.g. for Great Britain, Canada and Israel) (Art. 45 para. 3 GDPR).

In the case of data transfer to service providers in the USA, the legal basis for the data transfer is an adequacy decision of the EU Commission if the service provider has also certified itself under the EU US Data Privacy Framework.

In other cases (e.g. if no adequacy decision exists), the legal basis for the data transfer are usually, i.e. unless we indicate otherwise, standard contractual clauses. These are a set of rules adopted by the EU Commission and are part of the contract with the respective third party. According to Art. 46 para. 2 lit. b GDPR, they ensure the security of the data transfer. Many of the providers have given contractual guarantees that go beyond the standard contractual clauses to protect the data. These include, for example, guarantees regarding the encryption of data or regarding an obligation on the part of the third party to notify data subjects if law enforcement agencies wish to access the respective data.

1.4 Storage duration

Unless expressly stated in this privacy policy, the data stored by us will be deleted as soon as they are no longer required for their intended purpose and no legal obligations to retain data conflict with the deletion. If the data are not deleted because they are required for other and legally permissible purposes, their processing is restricted, i.e. the data are blocked and not processed for other purposes. This applies, for example, to data that must be retained for commercial or tax law reasons.

1.5 Rights of data subjects

Data subjects have the following rights against us with regard to their personal data:

- Right of access,
- Right to correction or deletion,
- Right to limit processing,
- Right to object to the processing,
- Right to data transferability,

- Right to revoke a given consent at any time.

Data subjects also have the right to complain to a data protection supervisory authority about the processing of their personal data. Contact details of the data protection supervisory authorities are available at https://www.bfdi.bund.de/EN/Service/Anschriften/Laender/Laender-node.html.

1.6 Obligation to provide data

Within the scope of the business or other relationship, customers, prospective customers or third parties need to provide us with personal data that is necessary for the establishment, execution and termination of a business or other relationship or that we are legally obliged to collect. Without this data, we will generally have to refuse to conclude the contract or to provide a service or will no longer be able to perform an existing contract or other relationship.

Mandatory data are marked as such.

1.7 No automatic decision making in individual cases

As a matter of principle, we do not use a fully automated decision-making process in accordance with article 22 GDPR to establish and implement the business or other relationship. Should we use these procedures in individual cases, we will inform of this separately if this is required by law.

1.8 Making contact

When contacting us, e.g. by e-mail or telephone, the data provided to us (e.g. names and e-mail addresses) will be stored by us in order to answer questions. The legal basis for the processing is our legitimate interest (Art. 6 para. 1 s. 1 lit. f GDPR) to answer inquiries directed to us. We delete the data accruing in this context after the storage is no longer necessary or restrict the processing if there are legal retention obligations.

1.9 Customer surveys

From time to time, we conduct customer surveys to get to know our customers and their wishes better. In doing so, we collect the data requested in each case. It is our legitimate interest to get to know our customers and their wishes better, so that the legal basis for the associated data processing is Art. 6 para. 1 s. 1 lit f GDPR. We delete the data when the results of the surveys have been evaluated.

2. Newsletter

We reserve the right to inform customers who have already used services from us or purchased goods from time to time by e-mail or other means about our offers, if they have not objected to this. The legal basis for this data processing is Art. 6 para. 1 s. 1 lit. f GDPR. Our legitimate interest is to conduct direct advertising (recital 47 GDPR). Customers can object to the use of their e-mail address for advertising purposes at any time without incurring additional costs, for example via the link at the end of each e-mail or by sending an e-mail to our above-mentioned e-mail address.

Interested parties have the option to subscribe to a free newsletter. We process the data provided during registration exclusively for sending the newsletter. Subscription takes place by selecting the corresponding field on our website, by ticking the corresponding field in a paper document or by another clear action, whereby interested parties declare their consent to the processing of their data, so that the legal basis is Art. 6 para. p. 1 lit. a GDPR. Consent can be revoked at any time, e.g. by clicking the corresponding link in the newsletter or notifying our e-mail address given above. The processing of the data until revocation remains lawful even in the event of revocation.

Based on the consent of the recipients (Art. 6 para. 1 s. 1 lit. a GDPR), we also measure the opening and click-through rate of our newsletters to understand what is relevant for our audience.

3. Data processing on our website

3.1 Notice for website visitors from Germany

Our website stores information in the terminal equipment of website visitors (e.g. cookies) or accesses information that is already stored in the terminal equipment (e.g. IP addresses). What information this is in detail can be found in the following sections.

This storage and access is based on the following provisions:

- Insofar as this storage or access is absolutely necessary for us to provide the service of our website expressly requested by website visitors (e.g., to carry out a chatbot used by the website visitor or to ensure the IT security of our website), it is carried out on the basis of Section 25 para. 2 no. 2 of the German Telecommunications Digital Services Data Protection Act (Telekommunikation-Digitale-Dienste-Datenschutzgesetz, "TDDDG").

- Otherwise, this storage or access takes place on the basis of the website visitor's consent (Section 25 para. 1 TDDDG).

The subsequent data processing is carried out in accordance with the following sections and on the basis of the provisions of the GDPR.

3.2 Informative use of our website

During the informative use of the website, i.e. when site visitors do not separately transmit information to us, we collect the personal data that the browser transmits to our server in order to ensure the stability and security of our website. This is our legitimate interest, so that the legal basis is Art. 6 para. 1 s. 1 lit. f GDPR.

These data are:

- IP address
- Date and time of the request
- Time zone difference to Greenwich Mean Time (GMT)
- Content of the request (specific page)
- Access status/HTTP status code
- Amount of data transferred in each case
- Website from which the request comes
- Browser
- Operating system and its interface
- Language and version of the browser software.

This data is also stored in log files. They are deleted when their storage is no longer necessary, at the latest after 14 days.

3.3 Web hosting and provision of the website

Our website is hosted by Hetzner. The provider is Hetzner Online GmbH, Industriestr. 25, 91710 Gunzenhausen, Germany. In doing so, the provider processes the personal data transmitted via the website, e.g. content, usage, meta/communication data or contact data, in the EU. Further information can be found in the provider's privacy policy at https://www.hetzner.com/legal/privacy-policy/.

It is our legitimate interest to provide a website, so the legal basis of the described data processing is Art. 6 para. 1 s. 1 lit. f GDPR.

We use the content delivery network UNPKG for our website. The provider is Sideway Inc., PO Box 2112, Los Gatos, CA 95031, USA . The provider thereby processes the personal data transmitted via the website, e.g. content, usage, meta/communication data or contact data in the USA. Further information can be found in the provider's privacy policy at https://unpkg.com/browse/policies@1.0.1/privacy-policy.md .

We have a legitimate interest in using sufficient storage and delivery capacity to ensure optimal data throughput even during large peak loads. Therefore, the legal basis of the described data processing is Art. 6 para. 1 s. 1 lit. f GDPR.

Legal basis of the transfer to a country outside the EEA are standard contractual clauses. The security of the data transferred to the third country (i.e. a country outside the EEA) is guaranteed by standard data protection clauses (Art. 46 para. 2 lit. c GDPR) adopted by the EU Commission in accordance with the examination procedure under Art. 93 para. 2 of the GDPR, which we have agreed to with the provider.

3.4 Contact form

When contacting us via the contact form on our website, we store the data requested there and the content of the message. The legal basis for the processing is our legitimate interest in answering inquiries directed to us. The legal basis for the processing is therefore Art. 6 para. 1 s. 1 lit. f GDPR. We delete the data accruing in this context after the storage is no longer necessary or restrict the processing if there are legal retention obligations.

3.5 Vacant positions

We publish vacant positions on our website, on pages linked to the website or on third-party websites.

The processing of the data provided as part of the application is carried out for the purpose of implementing the application process. Insofar as this is necessary for our decision to establish an employment relationship, the legal basis is Art. 88 para. GDPR in conjunction with Sec. 26 para. 1 of the German Data Protection Act (Bundesdatenschutzgesetz). We have marked the data required to carry out the application process accordingly or refer to them. If applicants do not provide this data, we cannot process the application.Further data is voluntary and not required for an application. If applicants provide further information, the basis is their consent (Art. 6 para. 1 s. 1 lit. a GDPR).

We ask applicants to refrain from providing information on political opinions, religious beliefs and similarly sensitive data in their CV and cover letter. They are not required for an application. If applicants nevertheless provide such information, we cannot prevent their processing as part of the processing of the

resume or cover letter. Their processing is then also based on the consent of the applicants (Art. 9 para. 2 lit. a GDPR).

Finally, we process the applicants' data for further application procedures if they have given us their consent to do so. In this case, the legal basis is Art. 6 para. 1 s. 1 lit. a GDPR.

We pass on the applicants' data to the responsible employees in the HR department, to our data processors in the area of recruiting and to the employees otherwise involved in the application process.

If we enter into an employment relationship with the applicant following the application process, we delete the data only after the employment relationship has ended. Otherwise, we delete the data no later than six months after rejecting an applicant.

If applicants have given us their consent to use their data for further application procedures as well, we will not delete their data until one year after receiving the application.

3.6 Customer account

Site visitors can open a customer account on our website. We process the data requested in this context based on the consent of the site visitor. We process the data requested in this context to fulfill the respective user contract concluded for the account, so that the legal basis for the processing is Art. 6 para. 1 p. 1 lit. b GDPR.

Beyond the data entered during registration, we process Log in Zeiten, Firmenzugehörigkeit usw.; wir speichern auch, welche Alarmmeldungen z.B. vom jeweiligen Nutzer wann bestätigt wurden, welche Assets angelegt werden und zuornungen von Gateways usw..

3.7 Single-sign on

Users can log in to our website using one or more single sign-on methods. In doing so, they use the login data already created for a provider. The prerequisite is that the user is already registered with the respective provider. When a user logs in using a single sign-on procedure, we receive information from the provider that the user is logged in to the provider and the provider receives information that the user is using the single sign-on procedure on our website. Depending on the user's settings in his account on the provider's site, additional information may be provided to us by the provider. The legal basis for this processing is Art. 6 para. 1 sentence 1 lit. f GDPR. We have a legitimate interest in providing users with a simple log-in option. At the same time, the interests of the users are safeguarded, as use is only voluntary.

Providers of the offered method(s) are:

- AzureAD-DC Connector

3.8 Technically necessary cookies

Our website sets cookies. Cookies are small text files that are stored in the web browser on the end device of a site visitor. Cookies help to make the offer more user-friendly, effective and secure. Insofar as these cookies are necessary for the operation of our website or its functions (hereinafter "Technically Necessary Cookies"), the legal basis for the associated data processing is Art. 6 para. 1 s. 1 lit. f GDPR. We have a legitimate interest in providing customers and other site visitors with a functional website. Specifically, we set technically necessary cookies for the following purpose or purposes:

· to save login data
· to remember search terms
· to apply language settings

3.9 Third parties

3.9.1 OpenStreetMap

We use OpenStreetMap for maps on our website. The provider is OpenStreetMap Foundation, St John's Innovation Centre, Cowley Road, Cambridge CB4 0WS, UK. The provider processes location data, meta/communication data (e.g. device information, IP addresses), usage data (e.g. web pages visited, interest in content, access times) in the EU.

The legal basis for the processing is Art. 6 para. 1 s. 1 lit. a GDPR . The processing is based on consent. Data subjects may revoke their consent at any time by contacting us, for example, using the contact details provided in our privacy policy. The revocation does not affect the lawfulness of the processing until the revocation.

The data will be deleted when the purpose for which it was collected no longer applies and there is no obligation to retain it. Further information is available in the provider's privacy policy at https://wiki.osmfoundation.org/wiki/Privacy_Policy.

3.9.2 heyData

We have integrated a data protection seal on our website. The provider is heyData GmbH, Schützenstraße 5, 10117 Berlin, Germany. The provider processes meta/communication data (e.g. IP addresses) in the EU.

The legal basis of the processing is Art. 6 para. 1 s. 1 lit. f GDPR. We have a legitimate interest in providing website visitors with confirmation of our data privacy compliance. At the same time, the provider has a legitimate interest in ensuring

that only customers with existing contracts use its seals, which is why a mere image copy of the certificate is not a viable alternative as confirmation.

As the data is masked after collection, there is no possibility to identify website visitors. Further information is available in the privacy policy of the provider at https://heydata.eu/en/privacy-policy .

4. Data processing on social media platforms

We are represented in social media networks in order to present our organization and our services there. The operators of these networks regularly process their users' data for advertising purposes. Among other things, they create user profiles from their online behavior, which are used, for example, to show advertising on the pages of the networks and elsewhere on the Internet that corresponds to the interests of the users. To this end, the operators of the networks store information on user behavior in cookies on the users' computers. Furthermore, it cannot be ruled out that the operators merge this information with other data. Users can obtain further information and instructions on how to object to processing by the site operators in the data protection declarations of the respective operators listed below. It is also possible that the operators or their servers are located in non-EU countries, so that they process data there. This may result in risks for users, e.g. because it is more difficult to enforce their rights or because government agencies access the data.

If users of the networks contact us via our profiles, we process the data provided to us in order to respond to the inquiries. This is our legitimate interest, so that the legal basis is Art. 6 para. 1 s. 1 lit. f GDPR.

4.1 Facebook

We maintain a profile on Facebook. The operator is Meta Platforms Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. The privacy policy is available here: https://www.facebook.com/policy.php. A possibility to object to data processing arises via settings for advertisements: https://www.facebook.com/settings?tab=ads.We are joint controllers for processing the data of visitors to our profile on the basis of an agreement within the meaning of Art. 26 GDPR with Facebook. Facebook explains exactly what data is processed at https://www.facebook.com/legal/terms/information_about_page_insights_data. Data subjects can exercise their rights both against us and against Facebook. However, according to our agreement with Facebook, we are obliged to forward requests to Facebook. Data subjects will therefore receive a faster response if they contact Facebook directly.

4.2 Instagram

We maintain a profile on Instagram. The operator is Meta Platforms Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. The privacy policy is available here: https://help.instagram.com/519522125107875.

4.3 YouTube

We maintain a profile on YouTube. The operator is Google Ireland Limited Gordon House, Barrow Street Dublin 4. Ireland. The privacy policy is available here: https://policies.google.com/privacy?hl=de.

4.4 X (formerly Twitter)

We maintain a profile on X. The operator is Twitter Inc, 1355 Market Street, Suite 900, San Francisco, CA 94103, USA. The privacy policy is available here: https://twitter.com/de/privacy. One way to object to data processing is via the settings for advertisements: https://twitter.com/personalization.

4.5 LinkedIn

We maintain a profile on LinkedIn. The operator is LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland. The privacy policy is available here: https://www.linkedin.com/legal/privacy-policy?_l=de_DE. One way to object to data processing is via the settings for advertisements: https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out.

4.6 Xing

We maintain a profile on Xing. The operator is XING AG, Dammtorstraße 29-32, 20354 Hamburg. The privacy policy is available here: https://privacy.xing.com/de/datenschutzerklaerung.

5. Changes to this privacy policy

We reserve the right to change this privacy policy with effect for the future. A current version is always available here.

6. Questions and comments

If you have any questions or comments regarding this privacy policy, please feel free to contact us using the contact information provided above.