Privacy Policy for Website-Visitors of Neutrik Group

We know that you care about your personal information and we do. For this reason, we want to take the greatest care and common sense when processing your personal data and we also feel obliged to protect your privacy on the Internet. This data protection declaration explains to you **in accordance with Art. 13 GDPR** how we collect, process and use your personal data when you visit one of our websites and wish to take advantage of the functions offered on it.

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. Scope of the Privacy Policy and Definitions

1.1. <u>Scope</u>



Neutrik AG (in the following "Neutrik") as an international company provides the following websites for customers, partners and interested parties. This privacy policy applies to the following websites:

www.neutrik.com

www.neutrik.de

www.neutrik.uk

www.neutrik-france.com

www.neutrik.com.us

www.neutrik.co.jp

www.neutrik.com.cn

https://www.opticalcon-configurator.neutrik.com

https://cps.neutrik.com/

https://backstage.neutrik.com

www.rean-connectors.com

1.2. <u>Definition</u>



Personal Data

All information relating to an identified or identifiable natural person. Personal data is information about an identified or identifiable person and therefore all information that makes an individual identifiable. Statistical data that cannot be directly linked to your person is not included here.

Controller

Body that decides on the purposes and means of processing personal data.

Jointly Responsible Persons

Two or more controllers jointly determine the purposes and means of the processing

Processor

Contractor is a natural or legal person, authority or institution or any other body that processes personal data on behalf of Neutrik.

Third Country

All those states that do not belong to the European Union (EU) or the European Economic Area (EEA).

Cookies

Data of a web page stored in a file on a local computer, which can identify the user who is on the Internet at this computer and can store information about his surfing behavior, so that between two connections of the user to the web page, the previous actions that are of interest for the web page can be temporarily stored.

Social Plug-Ins

Social plug-ins are a form of marketing in which a website is connected to a social network. This allows new visitors to be generated for the advertiser's website.

(Data) Processing

Any operation performed with or without the aid of automated procedures, such as collection, recording, organization, arrangement, storage, adaptation, modification, reading, querying, use, disclosure.

2. Who is responsible for data processing?

This privacy notice applies to data processing by



Neutrik AG

Im alten Riet 143 9494 Schaan Liechtenstein neutrik@neutrik.com

3. Who can I contact if I have questions about data processing?

Neutrik has appointed a data protection officer who you can contact at:



Neutrik AG

Head of Corporate Data Protection

Im alten Riet 143 9494 Schaan Liechtenstein dataprotection@neutrik.com

4. Which personal data do we process and the type and purpose of their use?

4.1. When visiting the website



Description and scope of processing

Whenever our web pages are called up, our system - the web server - automatically collects information from the system of the calling computer or end device of the user.

Following data are processed by us:

- Information about the browser type and the version used
- Operating system of the user's end device
- Internet service provider of the user
- IP address of the user
- Date and time of access
- Previous website from which the user accesses our website



Purpose of data processing

The temporary storage of the user's IP address by our system is necessary to enable the website to be delivered to the user's computer. For this purpose, the user's IP address must necessarily be stored for the duration of use. The storage of the above-mentioned data in the log files is done to ensure the functionality of our website. In addition, this data serves us to optimize the website and to ensure the security of our information technology systems (e.g.: to detect attacks). An evaluation of the data for marketing purposes does not take place in this context.



Legal basis for data processing

The legal basis for data processing for the temporary storage of data and log files is <u>Art. 6 para. 1 lit. f GDPR</u> (<u>legitimate interest</u>). The legitimate interest is the provision of technical services when calling up the website, as well as the optimization of our web presence for our website visitors.



Processing Period

The above-mentioned data will be deleted as soon as they are no longer required for the purpose for which they were collected. In the case of the collection of data for the provision of the website, this is the case when the respective session has ended. In the case of storage of data in log files, this is the case after 7 days at the latest. A storage beyond that is possible. In this case, the IP address of the user will be deleted or alienated by us, so that an assignment of the calling client is no longer possible and the data contained no longer show any personal reference.

4.2. When using our contact form



Description and scope of processing

If you have any questions, we offer you the possibility to contact us using our contact form and the provided e-mail addresses. If you contact us in this way, your data from the contact form or your e-mail, including the contact data you provide with it, will be processed. The indication of your e-mail address and a message text is necessary to contact you and to process your request, the indication of your name, your telephone number and country affiliation is voluntary.

Following data are processed by us:

- E-mail adress
- Message text
- First name (optional)
- Last name (optional)
- Phone number (optional)
- Country (optional)



Purpose of data processing

The processing of personal data serves us solely to process the contact request. If your request is for the conclusion of a contract or in connection with an already concluded contract, the processing of personal data serves us exclusively for the fulfillment of the contract.



Legal basis for data processing

The legal basis is <u>Art. 6 para. 1 lit. f GDPR (legitimate interest)</u>. The legitimate interest lies in ensuring that your concerns are processed by our company without delay.

If the request is for the conclusion of a contract or if the request is in connection with an already concluded contract, the legal basis for the data processing of the personal data that is processed in the course of sending an inquiry via our contact form is <u>Art. 6 para. 1 lit. b GDPR (implementation of pre-contractual measures/fulfilment of a contract).</u>

For personal data that you provide us voluntarily, Art. 6 para. 1 lit. a GDPR (consent) is the legal basis.



Processing Period

The above-mentioned data will be deleted as soon as they are no longer necessary for the purpose of their processing. For the personal data sent by e-mail or the contact form provided, this is the case when the respective conversation with the user has ended. The conversation is finished when it can be concluded from the circumstances that the matter in question has been finally clarified.



To whom do we transmit your data

To handle your contact request, we will forward your request internally to the responsible departments at the person in charge. If you also inform us about the country concerned, we can process your request even faster by forwarding your contact request to the Neutrik distribution partner or group company responsible for this country.



Third Country Transfer

If you make a country selection in the contact form, we can secure your data for a faster and more efficient request through our local partners. The transfer of your data to a third country serves exclusively to carry out pre-contractual measures on your behalf. Therefore, this is the legal basis for the transfer of data to third countries for which neither an adequacy decision nor suitable guarantees exist. The transfer of data to EU/EEA countries does not require a separate legal basis and does not fall under the transfer of data to third countries.



4.3. When ordering a newsletter



Description and scope of processing

If you are interested in our newsletters, you have the possibility to **voluntarily** give your consent to receive newsletters. When you order a newsletter, we only process the e-mail address you provide us with. We use your entered personal data first for the double opt-in procedure. This means that we will only send you the newsletter if, after sending a confirmation link to the e-mail address you provided, you confirm by means of a link contained in this e-mail that you wish to subscribe to our newsletter.

After sending a confirmation link by e-mail (double opt-in) to the e-mail address you have provided, we will use your e-mail address exclusively for sending our newsletter. Following data are processed by us:

E-mail adress



Purpose of data processing

The processing of personal data serves us only to provide our newsletter to your announced e-mail address, to inform you about news and offers.



Legal basis for data processing

The legal basis is Art. 6 para. 1 lit. a GDPR (consent). You can revoke your consent at any time and without giving reasons.



Processing Period

We store your personal data at the latest until the revocation of the consent you have given us.



To whom do we transmit your data

To send the newsletter, your e-mail address will be transmitted to our service provider Salesforce AG.



Third Country Transfer

We do not transfer your personal data to a third country.

4.4. When using our Support Request



Description and scope of processing

If you need technical questions about our products, services, or technical support, you can send us a request by the provided Support Request Form. If you contact us in this way, the personal data of the sender transmitted with the inquiry will be stored by us. This function is only available for our customers within the USA.

Following data are processed by us:

- First name
- Last name
- E-mail adress
- Phone number (optional)
- Message text (optinal)



Purpose of data processing

The processing of personal data serves us solely to process your support request.



Legal basis for data processing

The legal basis is Art. 6 para. 1 lit. b GDPR ((pre-) contractual measures).

Furthermore, the legal basis for the processing is <u>Art. 6 para. 1 lit. f GDPR (legitimate interest)</u>. Our legitimate interest is to ensure that we can advise you promptly on technical questions regarding our products, since customer satisfaction is of great importance to us.

For personal data that you provide us voluntarily <u>Art. 6 para. 1 lit. a GDPR (consent)</u> is the legal basis. You can revoke your consent at any time without giving reasons.



Processing Period

The above-mentioned data will be deleted as soon as they are no longer necessary for the purpose of their processing. For the personal data sent by e-mail or the provided request, this is the case when the respective

conversation with the user has ended. The conversation ends when it is clear from the circumstances that the matter in question has been finally clarified.



To whom do we transmit your data

Your data will be transmitted to Massive Art GmbH and Neutrik© US Inc.



Third Country Transfer

We transfer your personal data to the third country USA to *Neutrik*© *US Inc* to process your support request. A transfer takes place in compliance with the data protection regulations and we usually ensure this based on an appropriateness decision of the Commission of the European Union as well as standard contractual clauses. The data transfer is considered an administrative activity according to Art. Group privilege. Please also note that this function is exclusively for clients.

4.5. When using our Sample Request



Description and scope of processing

If you need product samples, you can send us a request via the provided Sample Request Form. If you contact us in this way, we will store the personal data of the sender transmitted with the request. Please note that this function is only available for our customers in the USA.

Following data are processed by us:

- First name
- Last name
- Title (optiona)
- Phone number (optional)
- E-mail adress
- Company name
- Kind of request
- Adress
- ZIP code
- Place
- Country
- Comment (optional)



Purpose of data processing

The processing of personal data serves us solely to process your product sample request.



Legal basis for data processing

The legal basis is Art. 6 para. 1 lit. b GDPR ((pre-) contractual measures).



Processing Period

The above-mentioned data will be deleted as soon as they are no longer necessary for the purpose of processing. For the personal data sent by e-mail or the request form provided, this is the case when the respective conversation with the user has ended. The conversation ends when it is clear from the circumstances that the matter in question has been finally clarified.



To whom do we transmit your data

Your data will be transmitted to Massive Art GmbH and Neutrik® US Inc.



Third Country Transfer

By using the request form, you transfer your personal data to the third country USA to *Neutrik*© *US Inc*. Your personal data will be stored on a server in Austria by *Massive Art GmbH* and your data will only be transferred to third countries in compliance with the data protection regulations of the GDPR. This is usually ensured based on an appropriateness decision of the Commission of the European Union as well as standard contractual clauses.

If you use our *Sample Request Form*, we will transfer your personal data to the third country USA to our subsidiary for the purpose of providing the requested products.

The lawfulness of data processing of your personal data to the third country USA results from the fulfillment of (pre-) contractual measures upon your request.

4.6. When using our Literature Requests



Description and scope of processing

If you need product brochures on Neutrik products, you can request them by using the *Literature Request Form*. If you use the Literature Request Form, the personal data submitted with the request will be processed.

Following data are processed by us:

- First name
- Last name
- Company name
- E-mail adress
- Phone number (optional)
- Adress
- ZIP code
- Place
- Country
- Comment (optional)



Purpose of data processing

The processing of personal data serves exclusively to process and complete your product brochure request.



Legal basis for data processing

The legal basis is Art. 6 para. 1 lit. b GDPR ((pre-) contractual measures).



Processing Period

The above-mentioned data will be deleted as soon as they are no longer necessary for the purpose of their processing. For the personal data sent by e-mail or the request form provided, this is the case when the respective conversation with the user has ended. The conversation ends when it is clear from the circumstances that the matter in question has been finally clarified.



To whom do we transmit your data

Your data will not be transmitted to third parties.



Third Country Transfer

By using the request form, you transfer your personal data to the third country USA to *Neutrik® US Inc.* Your personal data will be stored on a server in Austria by *Massive Art GmbH* and your data will only be transferred to third countries in compliance with the data protection regulations of the GDPR. This is usually ensured based on an appropriateness decision of the Commission of the European Union as well as standard contractual clauses.

If you use our request form to request product brochures, we will transfer your personal data to the third country USA to our subsidiary to provide the requested brochures.

The lawfulness of the data processing of your personal data to the third country USA results from the fulfilment of (pre-) contractual measures upon your request.

4.7. When using our optical CON Configurator



Description and scope of processing

We offer our customers the possibility to create offers and part numbers for our optialCON products by using the opticalCON Configurator. By using opticalCON Configurator, we only process your user account and access data.

Following data are processed by us:

- First name
- Last name
- E-mail adress
- Phone number (optional)



Purpose of data processing

Your personal data is processed exclusively for the purpose of providing the configuration service of our products.



Legal basis for data processing

The legal basis is Art. 6 para. 1 lit. b GDPR (implementation of (pre)contractual measures).



Processing Period

We store your personal data for the duration of our upright business relationship.



To whom do we transmit your data

Your data will not be transmitted to third parties.



Third Country Transfer

Your personal data will not be transferred to third countries.

4.8. When using our CPS (Customized Products & Solutions) Services



Description and scope of processing

We use the CPS (Customized Products & Solutions) service for the quotation of our cable products. Our employees process the necessary customer contact data to prepare the offer. This service is exclusively available to customers.

Following data are processed by us:

- Company
- Customer number
- First name
- Last name
- Adress
- ZIP code
- Place
- Country



Purpose of data processing

The processing of your personal data is exclusively for the purpose of preparing offers and processing contracts with our customers.



Legal basis for data processing

The legal basis is Art. 6 para. 1 lit. b GDPR (implementation of (pre)contractual measures).



Processing Period

We store your personal data for the duration of our upright business relationship.



To whom do we transmit your data

In general, your personal data will not be transferred to third parties, unless the transfer is necessary to fulfill our contractual obligations (delivery).



Third Country Transfer

We do not transfer your personal data to third countries, unless this is necessary for the fulfilment of our contractual obligations, in particular the delivery of your order.

4.9. Registration for Product Training



Description and scope of processing

Customers can participate in our product trainings. Your contact data are processed for the implementation and especially for the preparation and coordination of the product training.

Following data are processed by us:

- First name
- Last name
- E-mail adress
- Country (optional))
- Text message (optional)



Purpose of data processing

Your personal data is processed exclusively for the administrative and organizational implementation of product training.



Legal basis for data processing

The legal basis is <u>Art. 6 para. 1 lit. b GDPR (implementation of (pre)contractual measures)</u> and <u>Art. 6 para. 1 lit. f GDPR (legitimate interest)</u>. Our legitimate interest is to guarantee and provide the latest and most up-to-date technical information about our products.



Processing Period

We store your personal data until the product training is completed.



To whom do we transmit your data

Your data will not be transmitted to third parties.



Third Country Transfer

We do not transfer your personal data to third countries.

4.10. When using our Toolbox



Description and scope of processing

Customers can customize products within our Toolbox Services. For the performance of the contractual services, namely in particular for customizing products with our Toolbox, your contact data will be processed.

Following data are processed by us:

E-mail adress



Purpose of data processing

Your personal data is processed exclusively for the fulfillment of our contractual obligations in connection with our Toolbox.



Legal basis for data processing

The legal basis for the data processing is based on Art. 6 para. 1 lit. b GDPR (implementation of (pre-)contractual measures).



Processing Period

We store your personal data for the duration of our upright business relationship.



To whom do we transmit your data

Your data will not be transmitted to third parties.



Third Country Transfer

We do not transfer your personal data to third countries.

5. How long will your data be stored?



Unless otherwise stated in point 4, we store your personal data only if this is necessary and as far as there is a contractual (business relationship) and/or legal obligation to keep records (commercial/tax law). Data that we process based on a consent given by you will be deleted at the latest after the revocation of your consent.

6. Is the processing of your data carried out with the help of processors?



Neutrik works with contract processors. These have been selected with utmost care and compliance with data protection requirements is ensured by so-called "contracts for commissioned data processing" and their regular review.

In connection with our websites, these are the following contract processors:

- MASSIVE ART WebService GmbH For the provision, function, improvement, and maintenance of our websites
- TOWA GMBH For our marketing performance
- SALESFORCE AG For sending the newsletter (Double-Opt-In consent)
- GOOGLE For statistical purposes (consent via banner)

 NEUTRIK© US INC. – For the processing and implementation of our request forms (Support, Sample, Literature)

With our contract processing we have concluded contracts according to Art. 28 GDPR. If our contract processors are located outside the territory of the EU/EEA, the legality of the data transfer to a third country is ensured with our contract processor by means of standard contractual clauses before the data is transferred to the third country, unless the legality of the data transfer can be guaranteed by an adequacy decision.

7. Cookies



What are Cookies?

Cookies are small text files that enable the web server to recognize a website visitor, information about the visited websites are stored in the web browser. Cookies can be divided into "session cookies" and "persistent cookies". Session cookies are all those cookies that expire when a session is closed, i.e., they are only stored for the duration of the session. Persistent cookies, on the other hand, store the information collected over a longer period. Cookies can be set by website providers but also by third parties.

We may store cookies on your browser if they are necessary for the operation of the website. For all other categories of cookies, we need your consent.



We use Cookies

Our websites use cookies to ensure that you get the best experience on our website. We may store cookies on your device if they are necessary for the operation of our sites (necessary cookies). For all other cookies we need your consent, which you can give or withdraw at any time via our cookie banner.

We use a tool from Cookie Hub to process cookies in accordance with data protection regulations.

Necessary Cookies

Some cookies are required to provide core functionality. This website will not function properly without these cookies and they are enabled by default.

Analytical Cookies

Analytical cookies help us to improve our website by collecting and reporting information about your usage.

Marketing Cookies

Marketing cookies are used to track visitors to websites so that publishers can serve relevant ads.



You can change or revoke your cookie settings at any time on our website.

Cookie Settings in your Browser

If you wish to prevent cookies from being stored, you can set your browser to accept cookies only if you agree to this. Since the way cookies are managed depends on your browser, you will find further instructions for use here:

INTERNET EXPLORER

 $\frac{https://support.microsoft.com/en-us/topic/delete-and-manage-cookies-168dab11-0753-043d-7c16-ede5947fc64d$

CHROME

 $\underline{https://support.google.com/chrome/answer/95647?hl=en\&hlrm=de\&safe=strict}$

SAFARI

https://support.apple.com/en-euro/HT201265

FIREFOX

https://support.mozilla.org/de/kb/cookies-erlauben-und-ablehnen

OPERA

https://support.mozilla.org/de/kb/cookies-erlauben-und-ablehnen



Which cookies do we use?

Name	Provider	Storage Periode	Purpose	Туре
		Necessary		
PHPSESSID [x6]	neutrik.com neutrik.de lehre-bei-neutrik.com neutrik.in neutrik.com.cn neutrik-france.com	Session	Preserves user session state across page requests	НТТР
consent-is [x6]	neutrik.com neutrik.de neutrik-france.com neutrik.co.uk neutrik.com.cn neutrik.us	1 year	Determines whether the visitor has accepted the cookie consent field	НТТР
rc::a	google.com	Persistent	This cookie is used to distinguish between human and bots	HTML
rc::c	google.com	Session	This cookie is used to distinguish between humans and bots	HTML
XSRF-TOKEN	backstage.neutrik.com	2 hours	Ensures browsing security for visitors by preventing cross-site request forgery. This cookie is essential for the security of the website and the visitor	НТТР
neutrik_session	backstage.neutrik.com	2 hours	Preserves user session state across page requests	HTTP
		Marketing		
r/collect	doubleclick.net	Session	This cookie is used to send data to Google Analytics about the visitor's device and behavior. It tracks the visitors across devices and marketing channels.	Pixel
fr	facebook.com	3 months	This cookie enables retargeting measures from Facebook	HTTP
_fbp	facebook.com	3 months	Allows Facebook users to track across multiple websites	HTTP
		Statistic		
_ ga [x3]	neutrik.com neutrik.de	2 years	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	НТТР
_ gat [x3]	neutrik.com neutrik.de	24 hours	Is used by Google Analytics to limit the request rate	НТТР
_gid [x3]	neutrik.com neutrik.de	1 day	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	HTTP
_utm.gif	google-analytics.com	Session	Google Analytics Tracing Code that logs details about the visitor's browser and computer	Pixel
_utma [x4]	neutrik.com neutrik.in neutrik.com.cn neutrik-france.com	2 years	Collects data on the number of times a user has visited the website as well as dates for the first and most recent visit. Used by Google Analytics	http
_ utmb [x4]	neutrik.com neutrik.in neutrik.com.cn neutrik-france.com	1 day	Registers a timestamp with the exact time of when the user accessed the website. Used by Google Analytics.	http

_utmc [x4]	neutrik.com neutrik.in neutrik.com.cn neutrik-france.com	Session	Registers a timestamp with the exact time of when the user leaves the website. Used by Google Analytics.	http
_utmt [x4]	neutrik.com neutrik.in neutrik.com.cn neutrik-france.com	Session	Used to throttle the speed of requests to the server	http
_ utmz [x4]	neutrik.com neutrik.in neutrik.com.cn neutrik-france.com	6 months	Collects data on where the user came from, what search engine was used, what link was clicked and what search term was used. Used by Google Analytics.	НТТР

Applies to www.neutrik.com www.neutrik.com www.neutrik.com www.neutrik.com www.neutrik.com https://www.neutrik.com <a href="https://www.neutrik.

8. Do we transfer your data to third countries?



Neutrik also transfers your personal data to third countries. The transfer of your personal data is carried out in compliance with the data protection regulations.

The data protection regulations are usually ensured based on an adequacy decision of the Commission of the European Union as well as standard contractual clauses.

9. Do we use Social Plugins?



No, we do not use social plugins on our websites.

Linking to social network providers

There is therefore no direct connection between your browser and the social network. Consequently, no data or information from you will be transmitted by Neutrik to the respective service provider or processed in any other way. Links on our web pages can be recognized by the following symbols:



Neutrik has no influence on the contents of these websites and does not assume liability for them. The respective provider of the linked website is responsible for the content and accuracy of the information provided.

10. Privacy Policy on the use of Google Analytics



Google Analytics

If you have given your consent, this website uses Google Analytics, a web analysis service of Google LLC. The responsible service provider in the EU is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("Google").



Description and scope of processing

Google Analytics uses cookies that enable an analysis of your use of our website. The information collected by means of the cookies about your use of this website is usually transferred to a Google server in the USA and stored there.

We use the function 'anonymizeIP' (so-called IP-Masking): Due to the activation of the IP-anonymization on this website, your IP-address will be shortened by Google within member states of the European Union or in other contracting states of the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transferred to a Google server in the USA and shortened there. The IP address transmitted by your browser within the scope of Google Analytics is not merged with other data from Google. During your website visit, the following data, among others, is recorded:

- The pages you call up, your "click path
- Achievement of "website goals" (conversions, e.g. newsletter registrations, downloads, purchases)
- Your user behavior (for example clicks, dwell time, bounce rates)

- Your approximate location (region)
- Your IP address (in abbreviated form)
- Technical information about your browser and the end devices you use (e.g. language settings, screen resolution)
- Your internet provider
- The referrer URL (via which website/advertising medium you came to this website)



Purpose of Processing

On behalf of the operator of this website, Google will use this information to evaluate your (pseudonymous) use of the website and to compile reports on website activities. The reports provided by Google Analytics serve to analyze the performance of our website and the success of our marketing campaigns.



Receiver

Recipient of the data is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland as processor. For this purpose, we have concluded a contract with Google. Google LLC, headquartered in California, USA, and, where applicable, US authorities may access the data stored by Google.



Third Country Transfer

A transfer of personal data into the USA can not be ruled out.



Processing Period

The data sent by us and linked to cookies is automatically deleted after 14 months. Data whose retention period has been reached is automatically deleted once a month.

You can also prevent the collection of data generated by the cookie and related to your use of the website (including your IP address) to Google and the processing of this data by Google by



- do not give your consent to the setting of the cookie or
- Download and install the browser add-on to disable Google Analytics <u>here</u>

You can also prevent the storage of cookies by adjusting your browser software accordingly. However, if you configure your browser to refuse all cookies, this may result in a limitation of functionality on this and other websites.



Legal Basis and Right of Withdrawal

The legality is based on Art. 6 para. 1 lit. a GDPR consent). You can revoke your consent at any time with effect for the future by accessing the cookie settings.

For more information about Google Analytics terms of use and Google's privacy policy, please visit https://marketingplatform.google.com/about/analytics/terms/de/ and https://policies.google.com/?hl=en

11. External Links



On our website you will find various links to other websites. We have neither influence nor control over the content and data protection regulations of these linked websites. We therefore recommend that you check the privacy policy of these websites when you access links.

12. Data Security



We have taken appropriate technical and organizational measures to ensure data security when processing personal data. These measures are constantly being improved.

13. Automatic Decision Making and Profiling



No automatic decision making or profiling takes place.

14. Facebook Fanpage



What are Facebook Insights?

These are page statistics that can be used as a basis for fan page analysis. Via the Facebook Insights, conclusions can be drawn about the number of users reached, how many people have shared, commented, and liked amounts, which target group is addressed and which type of post is most successful. For this purpose, Facebook provides statistical conclusions about page activity, page views, "Like" information, reach,

post interactions, videos, page subscribers for a certain period (today, yesterday, last 7 days or the last 28 days) to the fan page operator.

14.1. Who are Jointly Responsible?

Jointly responsible for the Facebook Fanpage are:



Facebook Ireland Limited

4 Grand Canal Square D2 Dublin Ireland

and



Neutrik AG

Im alten Riet 143 9494 Schaan Liechtenstein

14.2. Who can I contact if I have questions about Data Protection?



Neutrik has appointed a company data protection officer, who you can contact at:

Neutrik AG

Head of Corporate Data Protection

Im alten Riet 143 9494 Schaan Liechtenstein dataprotection@neutrik.com

You can reach the data protection officer of Facebook at



Facebook Ireland Ltd.

4 Grand Canal Square Grand Canal Harbour Dublin 2 Ireland

or <u>here</u>

14.3. What Personal Data are processed, for what Purpose and on what legal basis?



Communication and Interaction

To communication with you, you can ask questions and contact us via our fan page. We also inform you about our products and events. Your username and the communication text transmitted with it will be processed.

The processing of your personal data serves the purpose of communication with you, such as answering inquiries and questions about our shared products and events.



The legal basis for this data processing is <u>Art. 6 para. 1 lit. f GDPR (legitimate interest)</u>. Our legitimate interest lies in communication, in answering your inquiries and concerns.



Insights

From Facebook we receive statistical data about the visitors of our fan page via the function Insights. We cannot assign this data to a specific user, but we can use it to better analyze our fan page and adapt it to the needs and requirements of our fan page visitors.

We use this data to make our posts and activities on our Facebook fan page more attractive.



The legal basis for this data processing is <u>Art. 6 para. 1 lit. f GDPR (legitimate interest)</u>. Our legitimate interest is the provision of a visitor-friendly fan page.

Facebook processes personal data through Insights, namely the use of cookies or the storage of the IP address. Facebook uses this data for advertising purposes and marketing research, among other things. As a result, you will receive advertising tailored to your Facebook profile. You receive this advertising on your

Facebook profile and also outside of it. If you are logged in to Facebook, Facebook also processes this data independently of the device you are using.



You can find the Facebook Insight statement here



Photos and Videos

If you have given us your consent in advance, we may publish photos and/or videos of you on our fan page.



The legal basis for this data processing is Art. 6 par. 1 lit. a GDPR (consent).

Revocation of Consent

You can revoce your consent at any time and without giving any reasons by sending a message to neutrik@neutrik.com or dataprotection@neutrik.com but in any case free of form. You can use the form available here for this purpose.

14.4. <u>Joint Responsibility</u>



Joint Responsibility Contract

An agreement on shared responsibility was concluded with Facebook. This can be accessed here

Delineation of Responsibility

The primary responsibility according to the GDPR for the processing of Insights data lies with Facebook and Facebook fulfills all obligations from the GDPR with regard to the processing of Insights data. Facebook makes the essential elements of the Page Insights supplement available to the persons concerned. Neutrik as operator of the fan page does **not make any decisions** regarding the processing of Insights data and all other information resulting from Art. 13 GDPR, including legal basis, identity of the person responsible and storage period of cookies on user devices.



Privacy Policy of Facebook

You can find the privacy policy of Facebook here



Settings for Processing Personal Data

The settings options for processing your personal data on Facebook can be found here

Rights of Data Subjects

The rights of data subjects (see point 16.), namely the right to information, disclosure, data transferability, can be asserted both with Neutrik and Facebook.



Inquiries about Facebook Insights

Requests from affected persons and regulatory authorities will be sent to Facebook as agreed.

15. Do Not Sell My Personal Information – CCPA



If you are a Californian resident, the California Consumer Privacy Act (CCPA) provides you with the right to opt out of the sale of your Personal Information. Neutrik takes your privacy very serious. We do **not sell** your Personal Information. Please review our Data Protection Declaration of how we process your Personal Information. However, we support Californian Residents and the CCPA – so you can contact us at *Head of Corporate Data Protection, Neutrik AG, Im alten Riet 143, 9494 Schaan Liechtenstein* and include the statement "California Privacy Rights CCPA" if you have any questions regarding to your *Do Not Sell My Personal Information* Right.

16. What Rights (in Privacy) do you have?



Right to Access

You have the right at any time to demand from the controller confirmation whether your personal data is processed. You can use the available form here.

Right of Rectification

You have the right to demand from the controller the rectification of incorrect information related to you. Depending on the purpose, this right also includes the completion of incomplete personal data.

Deletion

When the personal data from you mentioned above is no longer necessary for the purposes of processing, when the consent for processing issued by you is revoked and there are no further reasons for a continued

processing, you can assert your right to deletion and if there are no overriding justified reasons for a further processing, you can demand the deletion of your data.

Limitation of Processing

If the accuracy of the personal data from you that is processed is in dispute or if the processing is carried out unlawfully, you can demand from the person responsible a limitation of the processing.

Data Transferability

You can demand from the controller in a structured, usual, and machine-readable format any data that you have provided to the responsible person, that this data be transferred to another responsible person.

Right to Object

If the processing of your data is carried out on the legitimate interests of the responsible person or a third party, you can submit an appeal at any time by post to Neutrik AG, Im alten Riet 143, 9494 Schaan, neutrik@neutrik.com or at dataprotection@neutrik.com

Revocation of Consent

You can revoke your consent at any time, without giving reasons, in writing by mail to Neutrik AG, Im alten Riet 143, 9494 Schaan or at dataprotection@neutrik.com - in any case without any form requirements. You can use the form available here

The legality of the processing of your personal data, which has been processed based on the consent until the time of the revocation, is not affected by the revocation.

You can also revoke your consent to receive newsletters by using the opt-out button provided in the e-mail message.

Right of Appeal

If you believe that the processing of personal data concerning you is in breach of law, you have the right to complain to you local supervisory authority. You can find the competent authority here

17. Actuality and Changes of the Privacy Policy



Due to further developments of our website and offers on it, as well as changed legal regulations and/or guidelines, it may become necessary to change this data protection declaration. You can find the current data protection declaration here.

This data protection declaration is currently valid and is dated March 2021.

18. Forms



Here you will find all forms that are made available to website visitors in connection with our privacy policy:

Privacy policy for Neutrik website visitors <u>here</u> Cookie explanation <u>here</u>

Revocation Art. 7 GDPR <u>here</u> Request for information Art. 15 GDPR <u>here</u>

19. Information about your Right to Object according to Art. 21 GDPR



Case-Specific Right to Object according to Art. 21 para. 1 GDPR

You have the right at any time, for reasons arising your particular situation, to prevent the processing of personal data concerning you which, on the basis of Art. 6 para. 1 lit. f GDPR (legitimate interest) takes an objection; if you object, we will no longer process your personal data unless we can demonstrate compelling legitimate reasons for processing that outweigh your interests, rights and freedoms, or the processing is for the purpose of asserting, exercising or defending legal claims.

Exercise the Right of Objection

If you would like to exercise your right to object, a message with the subject "Objection per address to Neutrik AG, Im alten Riet 143, 9494 Schaan, neutrik@neutrik.com or dataprotection@neutrik.com is sufficient.

Neutrik Aktiengesellschaft

Last updated on March 26, 2021