



AFL Telecommunications GmbH Privacy Policy

July 2018

I. PRIVACY POLICY

Article 1 INFORMATION ON THE COLLECTION OF PERSONAL DATA

(1) The purpose of this privacy policy is to inform you on how we collect, process, use, store, retain and destruct your personal data. Personal data is defined as 'any information relating to an identified or identifiable natural person'. We collect and process data online, face to face, over the phone, in writing and through email communications.

We may collect and process the following:

- Your contact details such as your name, address, email address, telephone number, date of birth in order to be able to respond to you or reach you;
- Business contact information such as your job title, business location and type of services being offered as well as other employees in the business;
- Information you provide to us when enquiring about one of our services;
- Information you provide to us for a vacancy by way of submitting a CV or job application

If we ever collect special categories of data, we will ensure we satisfy one of ten conditions under Article 9 of the GDPR to process this type of data. We only collect sensitive data that is required to fulfill the purpose of the processing undertaken.

Special categories of data, if ever provided to AFL, would include:

- race;
- ethnic origin;
- political views;
- religious beliefs;
- trade union membership;
- genetics;
- biometrics (where used for ID purposes);
- health;
- philosophical beliefs
- sex life; or
- sexual orientation.

(2) If you have any questions about this privacy notice or our processing of your personal data, or if you wish to exercise your data protection rights, please use the contact details of our Data Protection officer below. The Data Protection Officer under Article 37, paragraph 7 of the EU General Data Protection Regulation (GDPR) is Nicole Hencinski, specialist lawyer for IT law, IT-IP-Legal® RechtsanwaltsGmbH, Mittelstrasse 12-14, 50672 Cologne, Kanzlei@it-ip-legal.de.

We keep your information in line with our data retention policy. For example we only keep your information for as long as is necessary for the purpose it was collected for, unless there is a legal obligation or a legitimate interest to retain that data further. This enables us to comply with legal and



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regulatory requirements, or use it where necessary for our legitimate purposes, such as dealing with any disputes or concerns that may arise.

Examples of this may include, but not limited to helping us respond to queries or complaints, detecting and preventing crime and responding to requests from regulators, etc. If we don't need to retain information for this period of time, we may destroy, delete or anonymise it more promptly.

(3) See below for in-depth information on the processes used in cases where we employ third parties for certain aspects of our services or wish to use your data for marketing purposes. We also list the criteria that determines the length of time for which information is stored.

Article 2 YOUR RIGHTS

(1) You have the following rights under the GDPR us in relation to your personal data:

- The right of access
- The right to be informed
- The right to rectification or erasure
- The right to restrict processing
- The right to object to processing
- The right to data portability
- The right to not be subject to a decision based on automated processing, including profiling

(2) You also have the right to make a complaint to a supervisory body about our processing of your personal data.

The Federal Commissioner for Data Protection and Freedom of Information
Nordrhein-Westfalen
Kavalleriestr. 2 - 4
40213 Düsseldorf
Tel.: 0211/38424-0
Fax: 0211/38424-10
E-Mail: poststelle@ldi.nrw.de

Article 3 COLLECTION OF PERSONAL DATA WHEN VISITING OUR WEBSITE

(1) If your use of the website is for information only and you do not register with us or share information in any other manner, we will only collect the personal data that your browser has shared with our server. When you view our website, we collect the following data, as we require them for technical reasons in order to display our website and ensure its security and stability::

- IP address
- Date and time of request
- Time difference in relation to Greenwich Mean Time (GMT)
- Content of the request (specific page)
- Access status/HTTP status code
- The quantity of data shared
- The referring website
- Browser
- Operating system and its interface



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– Language and version of browser software.

(2) In addition to the aforementioned data, cookies are stored on your computer when you use our website. Cookies are small text files that are stored on your hard drive by your browser and send specific information to those who set cookies (in this case, us). Cookies cannot execute programs or transmit viruses to your computer. Their purpose is to make a website more user-friendly and efficient.

(3) Cookie usage:

- a) The types of cookies used on this website are listed below. Their scope and functions are explained in the following section:
 - Transient cookies (see b)
 - Persistent cookies (see c)
- b) Transient cookies are erased automatically when you close your browser. Session cookies are one of the main types of transient cookies. They save a session ID, which is used to assign different browser requests to a complete session. In that way, your computer is recognised the next time you visit our website. Session cookies are erased when you log out or close our website.
- c) Persistent cookies are erased automatically after a certain period of time, depending on the type of cookie. You can delete cookies at any time in your browser's security settings.
- d) You can configure your browser settings according to your wishes and reject third-party cookies, for example, or all cookies. Please note that if you do not consent to the use of cookies, you may not be able to use all of the functions of this website.
- e) We use cookies so that we can identify you on future visits to our website.

II.

BLOG

(1) You can post public comments on our blog, which we use to publish various articles relevant to our activities. Your comments will be published on the article alongside the user name that you have provided. We recommend that you use a pseudonym instead of your real name. We require your user name and e-mail address; however giving any other information is voluntary. If you post a comment, we will save your IP address and delete it after one week. We need to save the address so that we can defend ourselves against liability claims in the event that a post is unlawful. We require your e-mail address so that we can get in contact with you should a third party object to the comment on legal grounds. Comments are reviewed prior to publication. We reserve the right to delete comments if they are objected to on legal grounds by third parties.

III.

NEWSLETTER

(1) You can subscribe to our newsletter, which we use to communicate our latest exciting offers to you, by providing your consent. The goods and services advertised are listed in the declaration of consent.

(2) We use a double opt-in procedure for newsletter registration. Double opt-in means that after you have registered, we will send an e-mail to the e-mail address provided in which we will ask you to confirm that you wish to receive the newsletter. If you do not confirm your registration within 24 hours,



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your information will be blocked and automatically deleted after one month. We also save the IP addresses used and time of registration and confirmation. We store this information in order to prove that you have registered and to clear up any misuse of your personal data.

(3) To receive the newsletter, you must declare your e-mail address only. After the e-mail address has been confirmed, we will save it for the purpose of sending the newsletter.

(4) You can revoke your consent to receive the newsletter at any time and unsubscribe. You can withdraw from such e-mails by clicking the link provided in every e-mail newsletter, by using the form on the website, by e-mail to info@aflglobal.com, or by notifying us in writing using the contact details listed in the legal notice on our website.

(5) Please note that we analyse user behaviour as part of our newsletter service. To perform the analysis, our newsletter e-mails contain web beacons, also known as tracking pixels, which create a 1x1 pixel gif that is saved on our website. To allow us to analyse user behaviour, we associate the data listed in Article 3 and the web beacons with your e-mail address and a unique ID. This ID is also found in newsletters containing links.

The data generated by the process let us create a user profile, which we use to tailor the newsletter to your unique interests. We collect information on when you read our newsletter and what links you click on, thereby enabling us to determine your personal interests. Those data are associated with your website activities.

You can withdraw your consent to tracking by clicking on the special link provided in each e-mail or contacting us in some other manner. The information is retained for the duration of your subscription to the newsletter. After logging out, the data are saved purely for statistical purposes and in anonymous form. Such tracking is not possible if the display of pictures is disabled in your e-mail software. In that case, the newsletter will not be displayed in full, and you may not be able to use all of its functions. If you manually allow pictures to be displayed, the aforementioned tracking will be activated.

IV.

GOOGLE USAGE

This website uses Google Analytics, a web analytics service provided by Google Inc. ("Google"). Google Analytics uses "cookies", text files that are stored on your computer and allow analysis of your website use. The information generated by the cookie about your use of this website is generally transmitted to and stored by Google on servers in the United States. If IP anonymisation is activated on this website, Google will truncate your IP address within European Union member states or other states that are party to the Agreement on the European Economic Area. Only in exceptional cases is the full IP address transferred to a Google server in the USA and truncated. Google will use that information on behalf of the operator of this website to evaluate your use of the website, to compile reports on website activity, and to render other services associated with website and Internet usage.



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(1) Google will ensure that the IP address shared by your browser for Google Analytics activities cannot be associated with any other data held by Google.

(2) You can prevent the storage of cookies by adjusting the appropriate settings of your browser software. However, please note that if you do so, it may not be possible for you to make full use of all this website's functions. You can also prevent the data generated by the cookie and related to your usage of this website (including your IP address) from being conveyed to and processed by Google by downloading and installing a browser plug-in available through the following link: <http://tools.google.com/dlpage/gaoptout?hl=de>

(3) This website uses Google Analytics with the extension "_anonymize IP()". It truncates IP addresses for further processing and guarantees that the information cannot be associated with any particular person. If the collected data can be assigned to a specific person, that will be rectified immediately, and the personal data deleted without delay.

(4) We use Google Analytics to analyse website use and continue to enhance the website. The statistics generated from Google Analytics allow us to improve our services and make them more interesting for you. For exceptional cases, where personal data are transmitted to the USA, Google has signed up to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.

(5) Third-party provider information: Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001. Terms of use: <http://www.google.com/analytics/terms/de.html>.

For an overview on data privacy: <http://www.google.com/intl/de/analytics/learn/privacy.html>

And the privacy policy: <http://www.google.de/intl/de/policies/privacy>

V.

SOCIAL MEDIA PLUG-IN USAGE

(1) We currently use the following social media plug-ins: Twitter and Flickr. We use the two-click method with our plug-ins, meaning that personal data are not immediately shared with the plug-in provider when you visit our site. You will recognise the plug-in provider by the marking on the box above its initial or by its logo. We offer you the opportunity to communicate directly with the provider via their button. The plug-in provider receives information that you have accessed their website via our online services only when you click on and activate the highlighted field. Further, the data listed in article 3 of this policy are shared with the provider. If you activate the plug-in, your personal data are sent to the respective plug-in provider and saved (in the USA if the provider is American). As the plug-in provider mainly uses cookies to collect data, we recommend that you go to the safety settings of your browser above the boxes that have been greyed out to delete all of your cookies prior to clicking the plug-in.

(2) We have neither control of the data collected and their processing procedures, nor are we familiar with the complete scope of data collection, the purposes of the processing or the retention periods. Similarly, we have no information regarding the deletion of the data by the plug-in provider.



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(3) The plug-in provider saves your data and creates a user profile which is employed for the purposes of advertising, market research and/or to optimise the design of its website. Such analysis is used (even when users are not logged in) to display customised advertisements in particular and to communicate your activities on our website to other users of the social network. You are entitled to object to the creation of a user profile, although you must contact the relevant plug-in provider to exercise that right. We offer you the opportunity to interact with social networks and other users via our plug-ins, which allow us to improve our services and make them more interesting for you as a user.

(4) Data will be shared with the provider irrespective of whether you have an account with them or are logged into your account. If you are logged into your account with the plug-in provider, the data which we collect on you are directly assigned to that account. If you click on the activate button and link to a page, for example, the plug-in provider will also save that information to your user account and share it publicly with your contacts. We recommend that you log out of social networks on a regular basis, especially before activating the button, in order to prevent the plug-in provider from assigning the data to your profile.

For further information on the purpose and scope of data collection and their processing by the plug-in provider, see the data privacy policies of providers listed below. There you will also find further information in relation to your rights and settings options that let you protect your privacy.

(5) Addresses, URLs and data privacy notices of the relevant plug-in providers:

a) Facebook Inc., 1601 S California Ave, Palo Alto, California 94304, USA;

<http://www.facebook.com/policy.php>; Further information on data collection:

<http://www.facebook.com/help/186325668085084>, <http://www.facebook.com/about/privacy/your-info-on-other#applications> and <http://www.facebook.com/about/privacy/your-info#everyoneinfo>.

Facebook has signed up to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-framework>.

b) Google Inc., 1600 Amphitheater Parkway, Mountainview, California 94043, USA;

<https://www.google.com/policies/privacy/partners/?hl=de>. Google has signed up to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-framework>.

c) Twitter, Inc., 1355 Market St, Suite 900, San Francisco, California 94103, USA;

<https://twitter.com/privacy>. Twitter has signed up to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-framework>.

d) Xing AG, Gänsemarkt 43, 20354 Hamburg, DE; <http://www.xing.com/privacy>.

e) T3N, yeebase media GmbH, Kriegerstr. 40, 30161 Hannover, Deutschland;

<https://t3n.de/store/page/datenschutz>.

f) LinkedIn Corporation, 2029 Stierlin Court, Mountain View, California 94043, USA;

<http://www.linkedin.com/legal/privacy-policy>. LinkedIn has signed up to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-framework>.

g) Flattr Network Ltd., 2 nd Floor, White bear yard 114A, Clerkenwell Road, London, Middlesex, England, EC1R 5DF, Großbritannien; <https://flattr.com/privacy>.



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1. Embedding YouTube videos

(1) Our online offering includes embedded YouTube videos, which are saved on <http://www.YouTube.com> and can be played directly from our website.

(2) When you visit our website, YouTube is notified that you have accessed the relevant subpage. Further, the data listed in article 3 of this policy are shared with the provider. That applies irrespective of whether you are logged into your YouTube account or whether you have no account with YouTube. If you are logged into Google, your data will be assigned to your account immediately. If you do not wish for the data to be assigned to your YouTube profile, you will have to log out before activating the button. YouTube saves your data and creates a user profile which is used for the purposes of advertising, market research and/or to optimise the design of its website. Such analysis is used mainly (even when users are not logged into the site) to display customised advertisements and to communicate your activities on our website to other users of the social network. You are entitled to object to the creation of a user profile, although you must contact the relevant plug-in provider to assert that right.

(3) For further information on the purpose and scope of data collection and their processing by YouTube, please consult its data privacy policy. There you will also find further information in relation to your rights and settings options that let you protect your privacy: <https://www.google.de/intl/de/policies/privacy>. Google also processes your personal data in the USA and has signed up to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-framework>.

2. Embedding Google Maps

(1) Our website uses Google Maps. We use the service to display interactive maps from within our website and allow you to use the map function conveniently.

(2) When you visit our website, Google is notified that you have accessed the relevant subpage. Further, the data listed in Article 3 of this policy are shared with the provider. That applies irrespective of whether you are logged into your Google account or whether you have no account with Google. If you are logged into Google, your data will be assigned to your account immediately. If you do not wish for the data to be assigned to your Google profile, you will have to log out before activating the button. Google saves your data and creates a user profile which is used for marketing purposes, market research and/or to optimise the design of its website. Such analysis is used mainly (even when users are not logged into the site) to display customised advertisements and to communicate your activities on our website to other users of the social network. You are entitled to object to the creation of a user profile, although you must contact Google to assert that right.

(3) For further information on the purpose and scope of data collection and their processing by the plug-in provider, please consult the provider's data privacy policy. There you can also access further information in relation to your rights and settings options in this regard that let you protect your privacy: <http://www.google.de/intl/de/policies/privacy>. Google also processes your personal data in the USA and has signed up to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-framework>.

VI.

USAGE OF GOOGLE ADWORDS CONVERSION

(1) We use Google Adwords advertising to make external websites aware of our services' merits. We can determine the success of individual advertising measures by reviewing the data generated through advertising campaigns. We aim to show you advertising that is of interest to you, to make our website more relevant to you, and to advertise in the most economic manner.

(2) Google offers Adwords software through its ad servers. We use ad server cookies to measure certain parameters of advertising success, such as impressions or user clicks. If you navigate to our website via a Google advertisement, Google Adwords will store a cookie on your PC. Such cookies generally expire after 30 days and are not designed to identify you as a person. Generally, information such as unique cookie ID, number of ad impressions per placing (frequency), last impression (relevant for post-view conversions) and opt-out information (an indication that the user no longer wishes to be targeted) are stored alongside the cookie as analysis values.

(3) Such cookies let Google recognise your Internet browser in future. If a user visits certain webpages belonging to an Adwords customer, Google and the customer can, provided that the cookie has not expired, recognise that the user has clicked on the advertisement and has been redirected to the website. Each Adwords client is assigned a different cookie. That means that cookies cannot be tracked across websites belonging to Adwords clients. We ourselves do not collect or process any personal data through the advertising measures listed above. Google only provides us with statistical analyses. We use that information to establish which of our advertising methods are particularly effective. We do not receive any other data from Google Adwords, and in particular we cannot identify users from the information provided.

(4) Because of the marketing tools used, your browser automatically establishes a direct connection with the Google server. We have no control on the scope of data collected by Google as a result of employing Adwords, or its further use, and would therefore like to share our knowledge of the matter with you: Through our embedding AdWords conversion on our website, Google is notified when you access a particular page on our site or click on one of our advertisements. If you are signed up to one of Google's services, Google can assign the visit to your account. Even if you are not registered with Google or are not logged into your Google account, it is still possible that Google can read and save your IP address.

(5) It is possible to prevent tracking in several ways:

(a) By changing your browser settings to reject third-party cookies, which will prevent you from receiving third-party advertisements in particular.

(b) By changing your browser settings to deactivate cookies for conversion tracking so that cookies are blocked from the domain "www.googleadservices.com"

The setting <https://www.google.de/settings/ads> will be deleted if you delete your cookies.

(c) By clicking on the following link to deactivate the provider's customised advertisements, which are part of the self-regulation campaign, 'About Ads': <http://www.aboutads.info/choices>. That setting



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will be deleted if you delete your cookies.

(d) By permanently deactivating Firefox, Internet Explorer or Google Chrome in your browser at the following link <http://www.google.com/settings/ads/plugin>. Please note that this may prevent you from using all of the functions of the service.

(6) You will find further information on data privacy for Google at <http://www.google.com/intl/de/policies/privacy> and <https://services.google.com/sitestats/de.html>. Alternatively, you can visit the Network Advertising Initiative's (NAI) website at <http://www.networkadvertising.org>. Google has signed up to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-framework>.

VII.

REMARKETING

In addition to Adwords software, we also use Google Remarketing. It is a procedure whereby we can target you subsequently. Google Remarketing enables us embed advertisements on other websites following your visit to our website. The process uses the cookies stored on your browser to collect and analyse your user behaviour when visiting different websites. Google can therefore detect that you have visited our website previously. Google states that it does not associate any of the data collected as part of remarketing with any of your personal data potentially held by Google. According to Google, a process of pseudonymisation is used for remarketing in particular.

VIII.

HOW DOES THE ORGANIZATION PROTECT DATA?

The organization takes the security of your data very seriously and has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused, disclosed, or accessed by anyone other than by its employees in the performance of their duties. Access to company systems is restricted to those who need the access to carry out their role.

Where the organization engages third parties to process personal data on its behalf, they do so: based on written instructions; are under a duty of confidentiality; and are obliged to implement appropriate technical and organizational measures to ensure data security.

When processing your data it may involve transferring your personal data abroad. You should be aware that this may include transfers to countries outside the European Economic Area, which do not have similarly strict data privacy laws. In those cases, we will put in place appropriate safeguards such as data transfer agreements based on the European Commission's standard contractual clauses in accordance with article 46(2) of the EU General Data Protection Regulation. You may contact us for further information.