

## PRIVACY NOTICE

Last updated: 02/2020

Your privacy is important to us and we are committed to protecting the confidentiality of your personal data. That's why we want you to be informed about what data of yours we store, when we store it and how we use it.

This privacy policy serves to inform users about how, to what extent and for what purposes personal data is collected and used by the controller/operator of this website and explains to you what rights and options you have in this regard.

It applies to all personal data which you provide to QC Partners or which stem from your contractual relationship or other interactions with QC Partners.

Our [\[cookie policy\]](#) also explains how we use cookies and other web tracking and analytics technologies to collect and use data.

We urge you to take the time to carefully read this privacy policy.

### Party responsible for your personal data

We, QC Partners GmbH, Goethestraße 10, 60313 Frankfurt am Main, Germany are the controller responsible for any and all personal data which you provide to us on the course of our business relationship.

### Categories of personal data we collect

We collect and process the following categories of personal data in particular:

- **Contact information** such as full name, business address, business phone number, business mobile phone number, business fax number and business e-mail address, your mobile device identifier and your computer's IP address when you access our website.
- **Payment information**, e.g., data required for processing payments and to prevent fraud
- Other **business information**, which must necessarily be processed in a contractual agreement or relationship with QC Partners or which you voluntarily provide, such as information relating to services or other business transactions, feedback on products and other information you provide to us or which is generated in the context of a business relationship.
- Information on your preferences and interests which we obtain from the **web tracking and analytics technologies** mentioned in our cookie policy, in particular when you use our website and the content we make available for download or other online services that we offer. For example, we collect information about what content you download from our website and what content you click on or view. This website currently does not use functions of web analysis services such as Google Analytics, Matamo or others.
- Information that we obtain from **publicly accessible sources**, databases and credit agencies.
- Where we are legally obligated to do so, we collect information for **compliance purposes**, such as information about legal disputes or court proceedings in which you or persons with whom you do business

are involved as well as information about interactions with you that might be relevant for anti-trust purposes.

- **Special categories of personal data.** When you register to attend an event, we may need to request information concerning your health, for instance so that we are aware of and can make allowance for any special dietary requirements you may have. Such information will only be used subject to your consent. However, if you do not provide us any information, for example about special dietary requirements, we will not be able to take the necessary precautions.

#### **Purposes for which we use your personal data**

We use your personal data solely for the following purposes ("**authorised purposes**"):

- initiating, performing and managing your contractual relationship (or the contractual relationship of your organisation) with QC Partners, e.g., by executing transactions and orders for products or services, processing payment transactions, accounting, auditing, billing and debt collection activities, arranging shipments and deliveries and providing support services or other services that you may have ordered or requested;
- safeguarding the security of our products, services and website or other systems, preventing and identifying security risks, fraud or other criminal or illegal acts;
- general compliance purposes, in particular to ensure compliance with legal and regulatory obligations and requirements to which we are subject, such as compliance screenings or record-keeping requirements (e.g., under competition law, export law, trade sanctions and embargo rules or anti-corruption or money laundering provisions). This may include the following measures: matching your contact or identity data with relevant sanctions lists and confirming your identity in the event of a possible match, recording your cooperation with third parties where this may be of relevance for anti-trust purposes, notifications to or audits by competent supervisory, law enforcement or other authorities;
- information in the context of an existing business relationship concerning similar or related products or services of QC Partners, provided this is permitted under applicable law;
- settling disputes, enforcing our contractual agreements and establishing, exercising or defending legal claims; or
- ensuring compliance with statutory obligations, e.g., retaining sales documentation for tax purposes or sending notifications and other communications required by law.

Insofar as you have given us your express consent, we may also use your personal data for the following purposes:

- communicating with you through the channels you have approved in order to keep you informed of the latest news, offers and other information about QC Partners' products, technologies and services (including marketing newsletters) and QC Partners' events and projects;
- managing and conducting client surveys, marketing campaigns, market analyses, competitions or other promotional activities or events.

Please be advised: under article 21(2) of the EU General Data Protection Regulation ("**GDPR**") you have the right to object to the processing of your personal data for marketing purposes; this includes the right to object to profiling as described above. Please refer to the section entitled "Your rights" for a detailed explanation of your rights and how you may exercise these.

We will only communicate with you for marketing purposes (e.g., by e-mail or phone calls) if you have given your prior express consent thereto, to the extent this is required by law. You may withdraw your consent at any time should you no longer wish to receive any promotional material from us.

We will not use your personal data for purposes of making automated decisions concerning you or to otherwise create personal profiles as described above.

The legal bases for the processing of your personal data are set out in article 6 GDPR. Depending on which of the above-described authorised purposes serves as the basis for processing your personal data, the processing will either be carried out for the performance of a contract or some other business agreement with QC Partners or for compliance with the legal obligation to which we are subject or for purposes of the legitimate interests pursued by QC Partners or by third parties, except where such interests are overridden by your interests or fundamental rights and freedoms so as to preclude processing. Processing may also be carried out on the basis of your express consent to the extent so given to us.

## **Cookies**

When you visit our website, information may be stored on your terminal device in the form of cookies. Cookies are small text files that are sent from a web server to your browser and stored on your terminal device. When you re-visit our website, the cookies are transmitted to our web server again. This allows us, for example, to recognise you on subsequent visits and serve you content more tailored to your needs.

The website uses functionality cookies – our Company uses these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in.

Most browsers are set to automatically accept cookies. You can prevent the use of cookies by configuring your browser settings accordingly and disabling all or some cookies. You may delete cookies from your hard drive at any time. If you have set your computer to reject cookies entirely (e.g., by disabling them in your browser settings) or if you delete cookies from your hard drive, this may include "strictly necessary" cookies as well. This can limit the functionality of the website and it is possible then that you will not have access to some of the website's features.

This website does not use functions of web analysis services such as Google Analytics, Matamo or others.

## **How we collect and use your personal data**

Normally, we collect your personal data directly from you in the context of our interactions with you when, for example, you visit our website, communicate with us about our products and services, place an order, subscribe to our newsletter, or participate in our client surveys. We do not receive personal data from third parties.

Provided that you have given us your express consent, we may receive your personal data from third parties as well for marketing purposes. In this event you would be advised of this in accordance with applicable law.

## **Contact form**

If you submit inquiries to us via our contact form, the information provided in the contact form as well as any contact information provided therein will be stored by us in order to handle your inquiry and in the event that we have further questions. We will not share this information without your consent.

The processing of these data is based on Art. 6 para. 1 lit. b GDPR, if your request is related to the execution of a contract or if it is necessary to carry out pre-contractual measures. In all other cases the processing is based on our legitimate interest in the effective processing of the requests addressed to us (Art. 6 Para. 1 lit. f DSGVO) or on your agreement (Art. 6 Para. 1 lit. a DSGVO) if this has been requested.

The information you have entered into the contact form shall remain with us until you ask us to eradicate the data, revoke your consent to the archiving of data or if the purpose for which the information is being archived no longer exists (e.g. after we have concluded our response to your inquiry). This shall be without prejudice to any mandatory legal provisions – in particular retention periods.

### **Where personal data is processed**

QC Partners is an internationally operating company. As part of our business, we may also forward your personal data to recipients in countries outside the European Economic Area ("Third Countries") that do not offer the same level of data protection as your home country. To the extent that we do so, we shall comply with applicable data protection standards and implement appropriate safeguards to ensure that your personal data is secure and protected, in particular by agreeing EU standard contractual clauses, which may be viewed. For further information about these safeguards, you may contact us at the address below at any time.

### **How we protect your personal data**

To protect your personal data, we have implemented state-of-the-art physical, electronic and process-related safeguards that meet statutory data protection requirements. These safeguards include deploying certain technologies and procedures to protect your privacy, such as secure servers, firewalls, and SSL encryption. We act in compliance with applicable laws and provisions relating to the confidentiality and security of personal data at all times.

### **Who we disclose your personal data to**

We may disclose your personal data to:

- our affiliates worldwide if and to the extent necessary and permitted by law for the above-described authorised purposes. In such cases, these companies will use the personal data only for the same authorised purposes and subject to the same terms and conditions as above. Click [\[here\]](#) for a list of all of QC Partners' group companies, including contact addresses;
- service providers (so-called "processors") within or outside of QC Partners in Germany or abroad (e.g., shared service centres or cloud providers) who have been engaged by us to process personal data on our behalf and exclusively according to our instructions for the authorised purposes. QC Partners retains control of and responsibility for your personal data and will take appropriate safeguards as required by applicable law to ensure the integrity and security of your personal data when engaging such service providers [\[hosting\]](#);
- courts, law enforcement authorities or other competent authorities or lawyers to the extent permitted by law and necessary for the fulfilment of a legal obligation or for the establishment, exercise or defence of legal claims;
- your personal data may also be disclosed to third parties when we sell or purchase business units or assets, in which case we may disclose personal data to the potential purchaser or seller and their advisers. If QC Partners GmbH or substantially all of its assets are acquired by a third party, the personal data stored by us about clients and other contact persons will be part of the transferred assets.

Otherwise, we will only disclose your personal data if you instruct us to do so or give your consent, if we are required by law or court or administrative order to do so, or if we suspect that fraudulent or criminal acts have been committed.

## **Hosting | External Hosting**

This website is hosted by an external service provider (host). Personal data collected on this website are stored on the servers of the host. These may include, but are not limited to, IP addresses, contact requests, metadata and communications, contract information, contact information, names, web page access, and other data generated through a web site.

Our host will only process your data to the extent necessary to fulfil its performance obligations and to follow our instructions with respect to such data.

### **Execution of a contract data processing agreement**

In order to guarantee processing in compliance with data protection regulations, we have concluded an order processing contract with our host.

### **How long do we store your personal data**

We will store your personal data for as long as is necessary to provide the services or products or information you have requested and to conduct and manage our business relationship with you. If you have requested us not to contact you, we will retain this information for as long as necessary to meet this request. We are legally obligated to store certain types of personal data for certain periods of time (e.g., based on retention periods under commercial or tax law). Your personal data will be deleted without undue delay once it is no longer required for these purposes.

### **Your rights**

Under certain conditions stipulated by law, you may request access to your personal data, rectification or erasure of personal data or restriction of processing of the personal data. You also have the right to object to processing or exercise your right to data portability. In particular, you have the right to request copies of your personal data stored with us. We reserve the right to charge you a fee if you make such requests repeatedly. For more detailed information about your data protection rights, see articles 15-22 GDPR.

If you have consented to the processing of your personal data, you may withdraw your consent at any time with effect for the future, i.e., withdrawing your consent will not negate the lawfulness of the processing on the basis of the consent prior to withdrawal. If you withdraw your consent, we will only process the personal data further if we have another legal basis for the processing or are under a legal obligation to do so.

To submit one of the aforementioned requests, please send a brief description of the personal data in question, stating your name and affixing your business signature as proof of identity, to the contact address below. We may require additional proof of identity in order to protect your personal data from unauthorised access. We will review your request carefully and if necessary contact you to discuss how we can best address it.

Should you have any concerns about how we process your personal data or wish to lodge a complaint, you can contact us at the address below to have the matter investigated. If you are not satisfied with our response or believe that we are not processing your personal data in accordance with applicable law, you may lodge a complaint with the competent data protection supervisory authority in your jurisdiction. [\[Contact\]](#)

### **Obligation to provide personal data**

When you provide us with your personal data, this is generally done on a voluntary basis. If you elect not to give us your consent or provide your personal data, this will not have any adverse consequences for you as a rule. However, there may be instances where QC Partners will not be able to act unless it has certain personal data, such as when that personal data is required to process your orders, provide you with access to online services or content or newsletters, or conduct a compliance audit required by law. In such cases, QC Partners will not be able to process your request without the relevant personal data.

**If you are under the age of 16**

If you are under the age of 16, you will need the consent of your parent or guardian before providing us with your personal data. Persons under the age of 16 are not permitted to transmit their personal data to us without such consent.

**Changes to our privacy policy**

This privacy notice was last updated in May 2018. We may change or amend the information contained herein if changes in the manner of processing or legislative environment so require. You are therefore advised to check from time to time or if you provide us with personal data as to whether there have been any changes. Changes to the privacy policy will enter into force from the date on which they are published on our website.

**Contact**

For problems, questions or suggestions, contact:

QC Partners GmbH  
Goethestraße 10  
60313 Frankfurt am Main / Germany

T: +49 (0) 69 - 50 5000 - 60

F: +49 (0) 69 - 50 5000 - 679

M: [info@qcpartners.com](mailto:info@qcpartners.com)

Data Protection Officer: Thomas Altmann ([thomas.altmann@qcpartners.com](mailto:thomas.altmann@qcpartners.com))