

# Privacy policy of Elma Schmidbauer GmbH

We welcome you to our website and appreciate your interest in our company. We take the protection of your personal data very seriously. We process your data in accordance with the applicable legal provisions for the protection of personal data, in particular the General Data Protection Regulation (GDPR) and the country-specific implementing laws applicable to us. With the help of this privacy policy, we provide you with comprehensive information about the processing of your personal data by Elma Schmidbauer GmbH and your rights.

Personal data is information that enables the identification of a natural person. This includes, in particular, your name, date of birth, address, telephone number, email address, and your IP address.

Anonymous data is data that cannot be linked to any specific user.

## **Responsible body and data protection officer**

Elma Schmidbauer GmbH  
Gottlieb-Daimler-Straße 17  
78224 Singen  
<https://www.elma-ultrasonic.com/>  
[info@elma-ultrasonic.com](mailto:info@elma-ultrasonic.com)  
Tel.: +49 7731 882 0  
Fax:

**Contact Data protection**  
[privacy@elma-ultrasonic.com](mailto:privacy@elma-ultrasonic.com)

## **Your rights as a data subject**

First of all, we would like to inform you about your rights as a data subject. These rights are standardized in Articles 15–22 of the GDPR. This includes:

- Right of access (Article 15 GDPR)
- Right to erasure (Article 17 GDPR),
- Right to rectification (Article 16 GDPR),
- Right to data portability (Article 20 GDPR),
- Right to restriction of processing (Art. 18 GDPR),
- Right to object to data processing (Art. 21 GDPR).

To exercise these rights, please contact: [privacy@elma-ultrasonic.com](mailto:privacy@elma-ultrasonic.com) . The same applies if you have any questions about data processing in our company or wish to revoke your consent at . You also have the right to lodge a complaint with a data protection supervisory authority.

## **Rights of objection**

Please note the following in connection with rights of objection:

If we process your personal data for the purpose of direct marketing, you have the right to object to this data processing at any time without giving reasons. This also applies to profiling insofar as it is related to direct marketing.

If you object to processing for direct marketing purposes, we will no longer process your personal data for these purposes. The objection is free of charge and can be made informally, preferably to: [privacy@elma-ultrasonic.com](mailto:privacy@elma-ultrasonic.com).

In the event that we process your data to protect legitimate interests, you may object to this processing at any time for reasons arising from your particular situation; this also applies to profiling based on these provisions.

We will then no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms, or the processing serves to assert, exercise, or defend legal claims.

## **Purposes and legal bases of data processing**

When processing your personal data, we comply with the provisions of the GDPR and all other applicable data protection regulations. The legal basis for data processing is derived in particular from Art. 6 GDPR.

We use your data for business development, to fulfill contractual and legal obligations, to execute the contractual relationship, to offer products and services, and to strengthen customer relationships, which may also include analyses for marketing purposes and direct advertising.

Your consent to data processing may also constitute a permission requirement under data protection law. Before you give your consent, we will explain the purpose of the data processing and your right of withdrawal.

If the consent also relates to the processing of special categories of personal data, we will expressly point this out to you in the consent form. Otherwise, special categories of personal data pursuant to Art. 9 GDPR will only be processed if this is required by law.

## **Disclosure to third parties**

We will only pass on your data to third parties within the framework of the statutory provisions or with your consent. Otherwise, no data will be passed on to third parties unless we are obliged to do so by mandatory legal provisions (passing on to external bodies such as supervisory authorities or law enforcement agencies).

## **Recipients of the data / categories of recipients**

Within our company, we ensure that only those persons who need your data to fulfill contractual and legal obligations receive it.

In certain cases, service providers support our specialist departments in fulfilling their tasks, in particular IT service providers, payment services, or shipping service providers. The necessary data protection agreements have been concluded with all service providers.

### **Third country transfer / intention to transfer to third countries**

Data will only be transferred to third countries (outside the European Union or the European Economic Area) if this is necessary for the performance of the contractual relationship, if it is required by law, or if you have given us your consent.

We transfer your personal data to service providers or group companies outside the European Economic Area to our affiliated companies in Switzerland.

Compliance with the level of data protection is ensured by, for example, EU standard contractual clauses, etc., as well as other guarantees where applicable.

### **Data storage period**

We store your data for as long as it is required for the respective processing purpose. Please note that numerous retention periods require that data continue to be stored. This applies in particular to commercial or tax law retention obligations (e.g., Commercial Code, Tax Code, etc.). If there are no further retention obligations, the data will be routinely deleted once the purpose has been achieved.

In addition, we may retain data if you have given us your permission to do so or if legal disputes arise and we use evidence within the framework of statutory limitation periods, which can be up to thirty years; the regular limitation period is three years.

### **Secure transmission of your data**

We use appropriate technical and organizational security measures to protect the data we store against accidental or intentional manipulation, loss, destruction, or access by unauthorized persons. The security levels are continuously reviewed in collaboration with security experts and adapted to new security standards.

Data exchange to and from our website is encrypted. We offer HTTPS as the transmission protocol for our website, using the latest encryption protocols. We also offer our users content encryption in the contact forms and for job applications. Only we are able to decrypt this data. It is also possible to use alternative communication channels (e.g., postal mail).

### **Obligation to provide data**

Various personal data is necessary for the establishment, execution, and termination of the contractual relationship and the fulfillment of the associated contractual and legal obligations. The same applies to the use of our website and the various functions it provides.

We have summarized the details for you in the above section. In certain cases, data must also be collected or made available due to legal requirements. Please note that it is not possible to process your request or execute the underlying contractual obligation without providing this data.

### **Categories, sources, and origin of the data**

The data we process is determined by the respective context: This depends on whether, for example, you place an order online or submit an inquiry using our contact form, whether you send us an application or submit a complaint.

Please note that we may also provide information for specific processing situations separately in the appropriate place, e.g., when uploading application documents or making a contact request.

**When you visit our website, we collect and process the following data:**

- Name of the Internet service provider
- Information about the website from which you are visiting us
- Web browser and operating system used
- The IP address assigned by your Internet service provider
- Requested files, amount of data transferred, downloads/file exports
- Information about the web pages you visit on our site, including date and time
- For technical security reasons (in particular to defend against attempts to attack our web server), this data is stored in accordance with Art. 6 (1) lit. f GDPR. After 7 days at the latest, the IP address is anonymized by shortening it so that no reference to the user can be made.

**When you contact us, we collect and process the following data:**

- Last name, first name
- Contact
- Company
- Information about wishes and interests

**When registering/creating a customer account, we process the following data:**

- Last name, first name
- Delivery address
- Billing address
- Email

**When you place an order, we process the following data:**

- Title
- Last name, first name
- Delivery address
- Billing address
- Email
- Sales tax number

**We process the following data for payment processing purposes:**

- Name
- Billing and delivery address
- Email
- Order details
- Payment information (e.g., credit card details, bank account details, PayPal information)
- IP address

- Any other data required for payment processing

**For online applications, we collect and process the following data:**

- Last name, first name
- Title
- Address
- Contact
- Earliest possible start date

**Optional information:**

- Date of birth
- Nationality
- Marital status
- Willingness to relocate
- Notice period
- Information about education
- Information on general skills
- Attachments such as resume, photo, references
- Salary expectations

**You can also voluntarily upload the following types of attachments:**

- Cover letter
- Resume (CV)
- References
- A photo of yourself
- Other documents of your choice

**For newsletters, we collect and process the following data:**

- Last name, first name
- Email
- Title

**Contact form / Contact via email, Art. 6 (1) (a), (b) GDPR**

Our website features a contact form that can be used to contact us electronically. If you write to us using the contact form, we will process the data you provide in the contact form in order to contact you and respond to your questions and requests.

The principle of data minimization and data avoidance is observed here, as you only need to provide the data that we absolutely need to contact you. This is your email address and the message field itself. In addition, your IP address is processed for technical reasons and for legal security. All other data is optional and can be provided voluntarily (e.g., to enable us to respond to your questions in a more personalized manner).

We implement appropriate security measures to protect the security and confidentiality of your data as best as possible. Your request is transmitted to us in encrypted form (specify/add details regarding content encryption if applicable).

If you contact us by email, we will process the personal data provided in the email solely for the purpose of processing your request. If you do not use the contact forms provided, no further data will be collected.

## **Registration/customer account, Art. 6 (1) (a), (b) GDPR**

On our website, we offer users the option of registering by providing personal data. The advantage of this is that you can view your order history and the data you have provided for the order form is saved. This means that you do not have to re-enter this data when placing a new order.

Registration is therefore necessary or possible either for the performance of a contract with you or for the implementation of pre-contractual measures.

The principle of data minimization and data avoidance is observed here, as a distinction is made between mandatory and voluntary information. Voluntary information is marked as "optional." Mandatory information includes, for example, your email address and password, including password repetition.

To place an order in our online shop, we also require billing address information (title, first name, last name, address) for delivery. If the delivery address differs from the billing address, the above information must also be provided for the delivery address.

When you register on our website, the user's IP address, the date, and the time of registration are also stored (technical background data). By clicking the "Register now" button, you consent to the processing of your data.

Please note: The password you choose is stored in encrypted form. Employees of our company cannot read this password. They are therefore unable to provide you with any information if you forget your password.

If you have forgotten your password, you can use the "Forgot password" function to receive a link that allows you to reset and re-set your password. No employee of is authorized to ask you for your password by telephone or in writing. Therefore, please never disclose your password if you receive such requests.

Once you have completed the registration process, your data will be stored with us for use in the protected customer area. As soon as you log in to our website with your email address as your username and password, this data will be made available for actions you perform on our website (e.g., for orders in our online shop). Completed orders can be tracked in the order history. You can specify changes to the billing or delivery address here.

Registered persons are free to make changes/corrections to the billing or delivery address in the order history themselves. Our customer service team will also be happy to make changes/corrections if you contact them. Of course, you can also cancel or delete your registration or customer account.

## **Keycloak, single sign-on (SSO), Art. 6 (1) (b), (f) GDPR**

We use Keycloak, an open source software for authentication and authorization, to manage user logins and access rights for our applications. This enables us to provide our customers with a secure login area and manage access rights. KeyCloak also supports us in preventing misuse and logging processes. KeyCloak enables secure single sign-on (SSO). In particular, the following data is processed: username, email address, first name/last name, password, login times, IP address, device and browser information, and authorization data. We enable you to log in with Microsoft Entra ID.

We store your data for as long as your customer account with us exists and statutory retention periods apply. After that, we will delete the data.

### **Microsoft Entra ID, Art. 6 (1) (a), (f) GDPR**

For secure identification and authentication, we use Microsoft Entra ID, which is provided to us by Microsoft Ireland Operations Limited, One Microsoft Place, South Country Business Park, Leopardstown, Dublin 18, Ireland. Microsoft Entra ID supports secure login, provides single sign-on (SSO), and assists with user management. When you log in with us, you will be redirected to Microsoft's servers. In particular, the following data is processed: first name/last name, email address, username, company affiliation, IP address, device and browser information, login time, security and risk indicators. Microsoft only provides us with the information necessary for authentication. The necessary contracts are in place. We store your data for as long as it is needed for the respective processing purpose. Please note that numerous retention periods require that data continue to be stored. It cannot be ruled out that Microsoft may also transfer data to third countries, in particular to the USA. The Data Privacy Framework exists for the USA, and Microsoft is also registered here. More detailed information can be found at <https://www.microsoft.com/de-de/privacy/privacystatement#mainmicrosoftaccountmodule>.

### **Webshop, Art. 6 (1) (b) GDPR**

We process the data you provide when placing an order solely for the purpose of executing or processing the contractual relationship, unless you consent to further use. The necessary data protection agreements have been concluded.

The principle of data minimization and data avoidance is observed in that you only need to provide us with the data that we absolutely need to perform the contract or fulfill our contractual obligations (i.e., your name, address, email address, information about your company, and the payment data required for the selected payment method) or that we are legally obliged to collect. We store your data for as long as it is needed for the respective processing purpose. Please note that numerous retention periods require that data continue to be stored. This applies in particular to commercial law or tax law retention obligations (e.g., Commercial Code, Tax Code, etc.). If there are no further retention obligations, the data will be routinely deleted once the purpose has been achieved.

In addition, your IP address is processed for technical reasons and for legal security. Without this data, we will unfortunately have to refuse to conclude the contract, as we will then be unable to perform it or may have to terminate an existing contract. Of course, you can also provide more data if you wish.

### **Payment service provider Shopify, Art. 6 (1) (b), (f) GDPR**

We use the service provider Shopify International Limited, Victoria Buildings, 2nd Floor, 1-2 Haddington Road, Dublin 4, D04XN32, Ireland, for payment processing. Shopify handles the payment processing. The necessary data protection agreements have been concluded.

The transfer is carried out exclusively for the purpose of payment processing and only to the extent necessary for this purpose. The principle of data minimization and data avoidance is observed in that you only have to provide the data that is absolutely necessary for the execution of the payment transaction and thus the execution of the contract, or that we are legally obliged to collect. Without this data, we will unfortunately have to refuse to conclude the contract, as we will then be unable to execute it.

The legal basis for this is Art. 6 (1) lit. b GDPR, insofar as this concerns the fulfillment of the contract. When it comes to secure and efficient payment processing, this is based on our legitimate interest pursuant to Art. 6 (1) lit. f GDPR.



The data will only be stored for as long as is necessary for the processing of the payment and the statutory retention periods.

We use SSL encryption for secure transmission of your data for payment purposes.

It cannot be ruled out that Shopify may also transfer data to third countries, in particular to Canada and the USA. There is an adequacy decision for both Canada and the USA. Detailed information about Shopify can be found at <https://www.shopify.com/de/legal/datenschutz>.

### **Data processing by shipping service providers**

We work with logistics service providers/transport companies and/or shipping partners to handle shipping. The following data may be transmitted for the purpose of delivering the ordered goods or for the purpose of shipping communication: first name, last name, postal address, and, if applicable, email address and telephone number. The legal basis for processing is Art. 6 (1) lit. b GDPR.

### **Elma Hub, Art. 6 (1) (a), (b) GDPR**

We offer our customers comprehensive service after they purchase our devices and other products. You can register for this in our ELMA Hub. There you will find comprehensive information about your devices, such as operating instructions, explanatory videos, and information about maintenance intervals and the repair status of your device.

In this context, we process the following information from you in particular: name, email address, contact details, industry, company, VAT, position, and a photo. The principle of data minimization and data avoidance is observed in that you only need to provide us with the data that is absolutely necessary for the use of our services, i.e., your name, email address, and company information.

The necessary data protection agreements have been concluded for this purpose.

### **Advertising purposes for existing customers, Art. 6 (1) lit. f GDPR**

We are interested in maintaining our customer relationship with you and sending you information and offers about our products/services. We therefore process your data in order to send you relevant information and offers by email.

If you do not wish this to happen, you can object to the use of your personal data for direct marketing purposes at any time; this also applies to profiling insofar as it is related to direct marketing. If you object, we will no longer process your data for this purpose.

The objection can be made free of charge and without giving reasons, and should be sent by email to [privacy@elma-ultrasonic.com](mailto:privacy@elma-ultrasonic.com) or by post to Elma Schmidbauer GmbH, Gottlieb-Daimler-Straße 17, 78224 Singen, Germany.

### **Applicant portal, Art. 6 (1) (a), (b) GDPR**



We appreciate your interest in working at Elma. We are aware of the importance of your data and will only process the personal data you provide in the application form for the purpose of effectively and correctly handling the application process and for contacting you during the application process. Your data will not be passed on to third parties without your consent.

You will be asked to provide personal data on the application form. We observe the principles of data minimization and data avoidance by only asking you to provide the data that we need to fully review your application documents, such as your resume, or that we are legally required to collect. Voluntary information is marked as "optional." Your IP address is also processed for technical reasons and for legal protection.

Without this data, we are unfortunately unable to review your application documents, which is why our application system does not allow you to upload your application documents in this case. Of course, you have the option of providing voluntary information in the application form.

We implement appropriate security measures to protect the security and confidentiality of your data as best as possible. Your application documents are transmitted to us in encrypted form via our application system.

We store your data for the above-mentioned purposes until the application process is complete and the relevant deadlines have expired—at the latest six months after receiving a decision. However, you have the option of allowing us to store your application documents for longer and match them with other vacant positions that match your profile.

For this, we need your consent, which you can give us by clicking the checkbox before uploading your application documents. In this case, we will store your data for 12 months. You can, of course, revoke your consent at any time without giving reasons with effect for the future by sending an email to [privacy@elma-ultrasonic.com](mailto:privacy@elma-ultrasonic.com) or by post to Elma Schmidbauer GmbH, Gottlieb-Daimler-Straße 17, 78224 Singen, Germany.

You also have the option of signing up for notifications (job alerts) about job vacancies at Elma on the basis of your consent in accordance with Art. 6 (1) (a) GDPR. To do this, you will be asked to provide an email address and a confirmation email will be sent to you. The notification function will be activated after you confirm the activation link in the email. You can unsubscribe from the job alert at any time – a deactivation link can be found in every job alert. Alternatively, you can contact us at [privacy@elma-ultrasonic.com](mailto:privacy@elma-ultrasonic.com).

### **Application via recruitment consultants**

Elma may also engage recruitment consultants to find suitable candidates. In this case, candidate data will be transferred to us by the recruitment consultant in accordance with the legal basis governing the relationship between the candidate and the recruitment consultant (i.e., usually either on the basis of your consent to the recruitment consultant or on the basis of a contract between the candidate and the recruitment consultant). The transfer is usually done electronically, i.e., via email. The recruitment consultant is responsible for processing your applicant data up to and including the transfer. After the applicant data has been transferred to Elma, it is processed in the same way as an application that reaches us via the applicant portal.

If you are recommended to us by the recruitment consultant for a job vacancy and are also hired, your data may be processed for the calculation and payment of commissions to the recruitment consultant.

The legal basis for the processing of your data by Elma is Art. 6 (1) lit. b GDPR and § 26 (1) sentence 1 BDSG (decision on the initiation of a contract at the request of the data subject).

For information on data processing by a recruitment consultant with whom you work, please contact your recruitment consultant.

### **Newsletter, Art. 6 (1) (a) GDPR**

You can subscribe to a free newsletter on our website. The email address and your name provided when registering for the newsletter will be used to send you the personalized newsletter.

The principle of data minimization and data avoidance is observed here, as only your email address and name are marked as mandatory fields. For technical reasons and for legal protection, your IP address is also processed when you subscribe to the newsletter.

We use the double opt-in procedure to send newsletters by email. This means that you will only receive advertising by email if you have expressly confirmed in advance that you want us to activate the newsletter service. We do this by sending you a notification email and asking you to confirm that you want to receive our newsletter at this email address by clicking on a link contained in this email.

You can, of course, cancel your subscription at any time using the unsubscribe option provided in the newsletter and thus revoke your consent. You can also unsubscribe from the newsletter at any time directly via our website.

### **Cookies, Art. 6 (1) (a), (f) GDPR, § 25 (1), (2) TDDD**

Our website uses cookies. These serve to make our offering more user-friendly, effective, and secure. Cookies are small text files that are stored on your device and saved by your browser (locally). Cookies contain only pseudonymous, and in most cases even anonymous, data. Some cookies remain for the duration of a browser session (so-called session cookies), others are stored for a longer period (so-called persistent cookies, e.g., language settings). The latter are automatically deleted after the specified time (usually 6 months). In addition to our own cookies, we also use cookies that are controlled by third-party providers. These use the information contained in the cookies to display content to you, for example, or to record the pages you have visited.

Based on our legitimate interest (Art. 6 (1) (f) GDPR), we use technically necessary cookies that are essential for the operation of the website and to ensure its functionality. Furthermore, we use cookies without your consent if their sole purpose is to store or access information stored on the end device for the transmission of messages or if they are absolutely necessary to provide the service you have expressly requested, § 25 (2) TDDD.

We use the following technically necessary cookies [please list]:

Name	Function	Storage period
payload-oauth-token	Authentication	1 day
payload-oauth-token-refresh	Authentication	1 year

Provided you give your consent, additional cookies are used to enable us or third parties to evaluate how our services are used. This allows us to tailor content to user needs. Cookies also enable us to measure the effectiveness of a particular advertisement and to place it, for example, depending on the thematic interests of the user. The legal basis for this is your express consent (Art. 6 (1) (a) GDPR, § 25 (1) TDDD).

You can revoke your consent at any time with future effect via our consent banner and change your cookie settings. Please note that changes must be made separately for each device.

If you have accounts with the third-party providers we use and are logged in there, your data may be linked to the respective account. You can avoid such a link by not giving your consent to the relevant cookies or by revoking your consent, or by logging out of the respective third-party providers in advance.

Most browsers automatically accept cookies. You can also manually disable, restrict, or delete cookies on your device via your browser settings or with the help of software. If you disable cookies, you will not be able to use our website to its full extent or only to a limited extent.

Please also note our information in the section of the respective service that uses cookies.

### **Google Analytics, Art. 6 (1) (a) GDPR, § 25 (1) TDDDG**

Our website uses Google Analytics, a web analytics service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, for statistical analysis of user access. Google Analytics uses cookies that enable an analysis of the use of our website. The information stored in this way is usually transferred to a Google server in the USA and stored there. If IP anonymization is activated, your IP address will be truncated before data transmission and within the European Union or contracting states of the European Economic Area. An unabridged transmission of the complete IP address to Google only takes place in exceptional cases.

On our behalf, Google will use this information to evaluate your use of the website, to compile reports on website activity, and to provide other services related to website activity and internet usage to the website operator. The IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data.

Sessions and campaigns are terminated after a certain period of time. By default, sessions are terminated after 30 minutes of inactivity and campaigns after six months. Users' personal data is deleted or anonymized after 14 months.

In this context, data processing is carried out on the basis of your consent, Art. 6 (1) (a) GDPR. Where necessary, a corresponding data protection agreement has been concluded. The service providers are obliged by corresponding contractual provisions and/or by certification under the US-EU Data Privacy Framework to comply with EU data protection standards and to guarantee the European level of data protection. Data processing or storage in third countries may also be carried out on the basis of your consent (Art. 49 (1) (a) GDPR); in this case, you will be informed separately of this and of any associated risks. For more information on terms of use and data protection, please visit <https://www.google.com/analytics/terms/de.html> and <https://policies.google.com/?hl=de>.

You can prevent the storage of cookies by adjusting your browser software settings accordingly; however, we would like to point out that in this case you may not be able to use all functions of this website to their full extent. You can also prevent Google from collecting the data generated by the cookie and relating to your use of the website (including your IP address) and from processing this data by downloading and installing the browser plug-in available under the following link: <http://tools.google.com/dlpage/gaoptout?hl=de>.

You can revoke your consent at any time with future effect. To do so, simply call up our consent banner and deselect the corresponding consent. Please note that the change in the consent banner settings must be made individually for each device.

For more information, please visit <https://support.google.com/analytics/answer/6004245> (general information about Google Analytics and data protection).

### **Google Tag Manager, Art. 6 (1) (a) GDPR**

This website uses Google Tag Manager from Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland). This service allows website tags to be managed via an interface. Tag Manager is used to control various scripts that may trigger further data processing. Google Tag Manager triggers other tags, which in turn may collect data. However, Google Tag Manager does not access this data. If deactivation has been carried out at domain or cookie level, it remains in place for all tracking tags, provided these are implemented with Google Tag Manager.

The legal basis for the use of Google Tag Manager is your express consent, Art. 6 (1) (a) GDPR and – insofar as Tag Manager accesses information on the end device – § 25 (1) TDDDG. Details on the data can be found in the respective sections on the tools controlled by Tag Manager. These can be processed upstream by Tag Manager using tags and then transferred to other tools (e.g., Analytics, Ads).

In this context, it may happen that the service providers process the data in a third country, the USA, or are based there. Where necessary, a corresponding data protection agreement has been concluded. The service providers are obliged by corresponding contractual provisions and/or by certification under the US-EU Data Privacy Framework to comply with EU data protection standards and to guarantee the European level of data protection. Data processing or storage in third countries may also take place on the basis of your consent (Art. 49 (1) (a) GDPR); in this case, you will be informed separately of this and of any associated risks.

You can revoke your consent at any time with effect for the future. To do so, simply call up our consent banner and deselect the relevant consent. Please note that the change in the consent banner settings must be made individually for each device.

More information about Google Tag Manager can be found at the following link: <https://marketingplatform.google.com/about/analytics/tag-manager/use-policy/>.

### **Use of Google Ads, Art. 6 (1) (a) GDPR**

Based on your consent, Art. 6 (1) (a) GDPR, we use Google Ads (Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA, and its representative in the EU, Google Ireland Ltd., Gordon House, Barrow Street, D04 E5W5, Dublin, Ireland) to place advertisements. Google places a cookie on your computer for this purpose. This allows personal data to be stored and evaluated:

- Activities (in particular which pages have been visited and which elements have been clicked on)
- Device and browser information (in particular the IP address and operating system)

- Data about the advertisements displayed (in particular, which advertisements were displayed and whether the user clicked on them)
- Data from advertising partners (in particular pseudonymized user IDs)

We only receive information about the total number of users who responded to our ad. No information is passed on that could be used to identify you. The use of this information is not for tracking purposes.

Data may be transferred to Google servers in the USA. Google operates on the basis of EU standard contractual clauses for data protection.

Further information on the processing of data by Google can be found here: <https://policies.google.com/privacy?gl=DE&hl=de>.

### **LinkedIn Ads, Art. 6 (1) (a) GDPR, § 25 (1) TDDDG**

Our website uses LinkedIn Ads from LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland, to advertise our offers on LinkedIn, measure the success of our advertising campaigns, and define target groups for advertising. In particular, the following data is processed: IP address, device and browser information, referrer URL, timestamp, page views, and, if applicable, member ID. The legal basis for this is your consent in accordance with Art. 6 (1) lit. a GDPR. You can revoke your consent at any time with effect for the future. The transfer of personal data cannot be ruled out. The legal basis for this is the EU-US Data Privacy Framework, with which LinkedIn is registered. The necessary agreement has been concluded. Detailed information can be found at <https://www.linkedin.com/legal/privacy-policy>.

### **Meta Ads Facebook/Instagram, Art. 6 (1) (a) GDPR, § 25 (1) TDDDG**

The advertising services of Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, to advertise our products on Facebook and Instagram, analyze the reach of our advertisements, track conversions, and target advertisements. For this purpose, we have integrated the Meta Pixel into our website so that user behavior can be recorded, target groups can be created, and conversion measurements can be carried out. Device and browser information, referrer URL, timestamp, page views, and, if applicable, the member ID are processed. The legal basis for this is your consent in accordance with Art. 6 (1) lit. a GDPR. You can revoke your consent at any time with effect for the future. The transfer of personal data cannot be ruled out. The legal basis for this is the EU-US Data Privacy Framework, with which LinkedIn is registered. The necessary agreement has been concluded.

### **MSClarity, Art. 6 (1) (a) GDPR**

For our website, we use the web analytics service Microsoft Clarity, provided by Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA. This allows us to anonymously evaluate user behavior on the website in order to analyze user behavior, improve user-friendliness and functionality, and also for technical error analysis. In particular, the following data is processed: abbreviated IP address, device and browser information, operating system, length of stay, clicks, scrolls, mouse movements, and referrer URL. The information obtained in this way is processed into anonymous heat maps. The legal basis for this is your consent in accordance with Art. 6 (1) (a) GDPR. You can revoke your consent at any time with effect for the future. The necessary contract has been concluded.

The data collected will only be stored for as long as is necessary for the purposes or for as long as there are legal retention periods.

It cannot be ruled out that data may also be transferred to the USA. Microsoft is certified under the EU-US Data Privacy Framework. In addition, we have concluded standard contractual clauses. Detailed information can be found at <https://www.microsoft.com/de-de/privacy/privacystatement>.

### **Hubspot, Art. 6 (1) (a) GDPR, § 25 (2) No. 2 TDDDG**

We use HubSpot on our website for marketing activities. HubSpot is a software company based in the USA with a branch office at HubSpot Ireland Limited, 2nd Floor, 30 North Wall Quay, Dublin 1, Ireland.

We use this integrated software solution for our own marketing and customer service purposes. This includes, among other things, email marketing, which regulates the sending of newsletters and automated mailings, reporting, contact management, e.g., user segmentation, landing pages, contact forms, and customer relationship management (CRM).

HubSpot uses cookies, small text files that are stored locally in your web browser's cache on your device and enable us to analyze your use of the website. HubSpot evaluates the information collected (e.g., IP address, geographic location, browser type, duration of visit, and pages viewed) on our behalf so that we can generate reports about the visit and the pages visited.

HubSpot processes the following data in particular: contact details, login details, order details, opt-in details, permissions, email address, events that occur within mailings, access times, navigation information, referral URL, performance data, website activity data, IP address.

Insofar as HubSpot is used for usage analysis on our website, this is done on the basis of your express consent, Art. 6 (1) lit. a GDPR, § 25 (2) No. 2 TDDDG. You can revoke your consent at any time with effect for the future. Please note that the change must be made individually in the consent banner settings for each device.

In addition, you can permanently object to the collection of data by HubSpot and the setting of cookies by preventing the storage of cookies through your browser settings.

The data will be deleted as soon as it is no longer required for the purpose for which it was collected. The EU is specified as the storage location for the data.

Since the transfer of personal data by HubSpot to affiliated companies and subcontractors in countries outside the EU and the EEA cannot be ruled out, the transfer is based on the adequacy decision of the EU Commission pursuant to Art. 45 (1) GDPR with regard to companies certified under the EU-U.S. Data Privacy Framework. HubSpot, Inc. is certified under the EU-U.S. Data Privacy Framework and is therefore committed to complying with appropriate data protection standards, which can be viewed at the following link: [www.dataprivacyframework.gov/s/participant-search](http://www.dataprivacyframework.gov/s/participant-search).

For potential transfers to other third countries outside the EU and the EEA for which there is no adequacy decision by the EU Commission, standard data protection clauses pursuant to Art. 46 (2) (c) GDPR are also agreed. These oblige the recipient of the data in the third country to process the data in accordance with the level of protection in Europe. Data processing or storage in third countries may also take place on the basis of your consent (Art. 49 (1) (a) GDPR); in this case, you will be informed separately of this and of any associated risks.

### **Google reCAPTCHA, Art. 6 (1) (a), (f) GDPR**

We use Google reCAPTCHA, a service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, on our website. reCAPTCHA is used to check whether entries on our website (e.g., in contact forms) are made by a natural person or abusively by automated

programs. This protects our website from spam, abuse, and automated attacks. reCAPTCHA analyzes the behavior of website visitors based on various characteristics. This analysis begins automatically as soon as the website with reCAPTCHA is accessed. Among other things, the following information is processed: IP address, referrer URL, date and time of access, mouse movements and interactions, length of stay on the website, browser and device information, and any cookies that may have been set. The analysis takes place in the background and serves exclusively to prevent abuse. Processing is based on Art. 6 (1) lit. f GDPR (legitimate interest). Our legitimate interest lies in protecting our website from automated attacks, spam, and misuse. If reCAPTCHA is only loaded after consent has been given via a consent management tool, processing is also carried out on the basis of Art. 6 (1) lit. a GDPR (consent). Consent can be revoked at any time with effect for the future. When using reCAPTCHA, personal data may be transferred to the USA. The basis for this is the EU-U.S. Data Privacy Framework (DPF), with which Google is registered. The storage period for the data processed by Google is based on Google's privacy policy. We ourselves do not store any additional personal data in connection with reCAPTCHA. If processing is based on legitimate interests, you can object to the processing in accordance with Art. 21 GDPR. If consent has been given, you can revoke it at any time using our consent tool.

### **Social media links**

On our website, you will find links to the social media services of Meta/Facebook, YouTube, Instagram, and LinkedIn. Links to the websites of social media services can be recognized by the respective company logo. If you follow these links, you will be taken to Elma's company profile on the respective social media service. When you click on a link to a social media service, a connection to the servers of the social media service is established. This transmits to the servers of the social media service that you have visited our website. In addition, further data is transmitted to the provider of the social media service. This includes, for example:

- Address of the website on which the activated link is located
- Date and time of the website visit or link activation
- Information about the browser and operating system used
- IP address

If you are already logged in to the relevant social media service when you activate the link, the provider of the social media service may be able to determine your user name and, in some cases, even your real name from the data transmitted and assign this information to your personal user account with the social media service. You can prevent this assignment to your personal user account by logging out of your user account beforehand.

The servers of the social media services are located in countries outside the European Union. The data may therefore also be processed by the social media service provider in countries outside the European Union. Please note that companies in these countries are subject to data protection laws that generally do not protect personal data to the same extent as in the member states of the European Union.

Please note that we have no influence on the scope, type, and purpose of data processing by the social media service provider. For more information on the use of your data by the social media services integrated on our website, please refer to the privacy policy of the respective social media service.

### **Links to other providers**

Our website also contains clearly recognizable links to the websites of other companies. Where links to websites of other providers are provided, we have no influence on their content. Therefore, no guarantee or liability can be assumed for this content. The respective provider or operator of the pages is always responsible for the content of these pages.

The linked pages were checked for possible legal violations and recognizable infringements at the time of linking. No illegal content was found at the time of linking. However, permanent monitoring of the content of the linked pages is not reasonable without concrete evidence of a violation of the law. If violations of the law become known, such links will be removed immediately.

### **Automated individual case decisions**

We do not use purely automated processing procedures to make decisions.

## Information on data protection in social media

Elma maintains social media accounts on Facebook, Instagram, LinkedIn, and YouTube. Insofar as we have control over the processing of your data, we ensure that the applicable data protection regulations are complied with.

Below you will find the most important information on data protection law in relation to our social media accounts.

### Name and address of those responsible for operation

In addition to Elma, the following is responsible for the company's social media accounts in accordance with the General Data Protection Regulation (GDPR) and other data protection regulations

- **Facebook**  
Meta Platforms Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland
- **Instagram**  
Meta Platforms Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland
- **LinkedIn**  
LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland
- **YouTube**  
Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland

However, you use these platforms and their functions at your own risk. This applies in particular to the use of interactive functions (e.g., commenting, sharing, rating).

We would also like to point out that your data may be processed outside the European Union.

### Purpose and legal basis

We maintain the fan pages ourselves in order to communicate with visitors to these pages and to inform them about our offers in this way.

We also collect data for statistical purposes in order to further develop and optimize the content and make our offerings more attractive. The data required for this (e.g., total number of page views, page activities, and data provided by visitors, interactions) is processed by the social media networks and made available to us. We have no influence on the generation and presentation of this data.

In addition, your personal data is processed by social media providers, but also by Elma, for market research and advertising purposes. For example, it is possible that usage profiles are created based on your usage behavior and the resulting interests. This allows, among other things, advertisements to be placed within and outside the platforms that correspond to your interests. For this purpose, cookies are usually stored on your computer. Irrespective of this, data that is not collected directly on your end devices may also be stored in your usage profiles. Storage and analysis also takes place across devices; this applies in particular, but not exclusively, if you are registered as a member and logged in to the respective platforms.

Elma processes your personal data on the basis of our legitimate interests in effective information and communication in accordance with Art. 6 (1) lit. f. GDPR.

If you are asked to consent to data processing, i.e., if you give your consent by confirming a button or similar (opt-in), the legal basis for processing is Art. 6 (1) (a), Art. 7 GDPR.

### **Third country transfer**

The providers of social media platforms also process and store some of your data in a third country (USA). In the case of data transfers to the USA, there is a risk that your data may be processed by US authorities for control and surveillance purposes without you having any legal remedies. The assertion of data subject rights may also be restricted. However, we take all necessary data protection measures in accordance with Art. 44 ff. GDPR to ensure a level of data protection in the third country that complies with the GDPR. The relevant data protection agreement (data processing agreement, possibly in conjunction with standard contractual clauses) has been concluded. The service providers are obliged by corresponding contractual provisions and/or by certification under the US-EU Data Privacy Framework to comply with EU data protection standards and to guarantee the European level of data protection. Data processing or storage in third countries may also take place on the basis of your consent (Art. 49 (1) (a) GDPR); in this case, you will be informed separately of this and of any associated risks.

### **Your rights/right to object**

If you are a member of a social network and do not want the network to collect data about you via our website and link it to your stored membership data on the respective network, you must

- log out of the respective network before visiting our fan page,
- delete the cookies on your device, and
- close and restart your browser.

However, after logging in again, you will once more be recognizable to the network as a specific user.

For a detailed description of the respective processing and the options for objection (opt-out), please refer to the information linked below:

- **Facebook**  
Privacy policy: <https://www.facebook.com/about/privacy/>;  
Opt-out: [https://www.facebook.com/settings?tab=ads\\_and](https://www.facebook.com/settings?tab=ads_and) and  
[http://www.youronlinechoices.com](http://www.youronlinechoices.com;);
- **Instagram**  
Privacy policy: [https://help.instagram.com/519522125107875](https://help.instagram.com/519522125107875;);  
Opt-out: [optout.networkadvertising.org/](https://optout.networkadvertising.org/) and  
[http://www.youronlinechoices.com](http://www.youronlinechoices.com;);
- **LinkedIn**  
Privacy policy: <https://www.linkedin.com/legal/privacy-policy>;  
Opt-out: <https://www.linkedin.com/legal/cookie-policy> and  
[http://www.youronlinechoices.com](http://www.youronlinechoices.com;);

- **YouTube**

Privacy policy: <https://policies.google.com/privacy>;  
Opt-out: <https://tools.google.com/dlpage/gaoptout?hl=de> and  
<http://www.youronlinechoices.com>;

Overall, you have the following rights regarding the processing of your personal data:

Right to information; Right to correction; Right to deletion; Right to restriction of processing; Right to objection; Right to data portability; Right to complain about unlawful processing of your personal data to the competent data protection authority.

However, as Elma does not have full access to your personal data, you should contact the respective social media providers directly when asserting your rights, as they have access to their users' personal data and can take appropriate measures and provide information.

If you still need help, we will of course try to assist you. Please contact [privacy@elma-ultrasonic.com](mailto:privacy@elma-ultrasonic.com).

### **Information on copyright and artistic copyright**

If you wish to publish images, texts, plans, videos, music, etc. on our website, you should be aware that you may be transferring all rights of use to the network, which could ultimately have legal consequences for you if you are not the author or copyright holder yourself.