

GDPR: Privacy Policy (Stand 2021)

This website is operated by GENOA net works IT-BeratungsGmbH (company no. 228843i) and GENOA International GmbH (company no. 463311s), both having their business address at Kapuzinerstrasse 84e, 4020 Linz, as joint controllers within the meaning of Art. 26 of the GDPR (hereinafter 'we', 'us', and 'GENOA'). In this Privacy Policy, we as joint controllers pursuant to Art. 4(7) of the EU GDPR set out which data we collect when you visit our website and for what purpose we process them (Part A). We also inform you how we process the data of our customers, suppliers, and interested parties for general marketing purposes (Part B) and we explain in general the rights and securities offered by us in the context of data processing (Part C). Please see point C.4 of this Privacy Policy for all relevant contact details.

As the protection of your personal data is particularly important to us, we shall strictly comply with the statutory requirements of the Austrian Data Protection Act and the EU GDPR when collecting and processing your data.

In what follows, we will inform you in detail of the extent and purpose of our data processing, as well as of your rights as a data subject. Therefore, please read our Privacy Policy carefully before continuing to use our website and, as the case may be, consenting to any data processing.

A. Processing of personal data on our website

1. Personal Data

It is possible in principle to use our website without entering any personal data. However, different rules may apply to the use of some of our services, to which you will be alerted separately.

Thus – apart from cookies, as described in detail below – we will generally only collect and store data communicated to us by yourself by entering these data in input masks or otherwise actively interacting with our website.

Personal data means any information relating to an identified or identifiable natural person. This includes, for example, your name, your address, your telephone number, or your date of birth, but also your IP address or geolocation data attributable to you.

2. Use of cookies

a. Where you only use our website for information purposes, that is, if you do not register for a service or otherwise transmit information to us by e.g. using a contact form, we only collect those personal data that are transmitted to our server by your browser. If, therefore, you wish to visit our website, we will collect the following data, which are technically necessary for us to display our web-

site and to ensure its stability and security pursuant to point (f) of Art. 6(1) of the GDPR:

- IP address
- Date and time of the request
- Difference in time zone to Greenwich Mean Time (GMT)
- Content of the request
- Access status / HTTP status code
- Quantity of data transmitted
- Website from which the request originates
- Browser used
- Operating system and its interface
- Language and version of the browser software

b. When you use our website, in addition to the aforementioned data, first and third-party cookies will be stored on your computer; these are small text files stored on your hard drive and assigned to the browser used by you. The provider setting a cookie (here, this is done by us and the third parties listed below) will thereby obtain particular information. We require these cookies, on the one hand, to recognise you as a user of the website and, on the other hand, to evaluate how our services are being used. Finally, we use cookies for marketing purposes to analyse your user behaviour and, where appropriate, serve you targeted advertising.

In general, a distinction can be made between first-party cookies, third-party cookies, and third-party requests.

- First-party cookies

First-party cookies are stored in your browser by us, meaning by our own website, in order to provide you with the best possible user experience. In particular, this involves functional cookies such as shopping basket cookies. We will store the following first-party cookies:

- **_icl_visitor_lang_js** (life-time: 1 day)

This cookie stores the language selected by you on our website, so that during your visit, each of our pages and subpages can be displayed in the language requested by you.

- **wpml_browser_redirect_test**: (life-time: session)

This cookie captures whether cookies can and may be stored in your browser.

- **visitor_id** (life-time: 10 years)

This cookie allocates a unique ID to your browser on our system so as to identify you as a unique visitor to our website at subsequent visits.

- Third-party cookies

Third-party cookies will be stored in your browser by a third-party provider. These are usually tracking or marketing tools both analysing your user behaviour and giving the third-party provider the opportunity to recognise you when you visit other websites. Such cookies are used, for instance, for retargeting marketing. We will store the following third-party cookies:

- ga (life-time: 2 years)
- gid (life-time: 1 day)
- gat_UA (life-time: 1 hour)

These cookies are used by the web analytics service Google Analytics and are stored for up to 2 years. We explain the exact functioning of Google Analytics in point 6.a of this Privacy Policy.

The following cookies are set by the web service Salesforce and have different purposes.

- **BrowserId** (life-time: session)
- **BrowserId_sec** (life-time: session)

Used to record secure browser sessions/visits for internal security applications.

- **renderCtx**

Used to serve requested pages and contents based on a given user's navigation.

- **sfdc-stream**

Used to properly forward server requests within the Salesforce infrastructure for permanent sessions.

- **force-proxy-stream**

Used to ensure that client requests hit the same proxy hosts and are more likely to retrieve content from the cache.

- **force-stream**

Used to properly forward server requests within the Salesforce infrastructure for Sticky sessions.

- **pctrk**

Used to count page requests from unauthenticated users against licensed use.

c. We also use cookies so as to identify you at subsequent visits if you have an account with us – otherwise, you would have to log in again each time you visit.

3. Collection and processing of personal data

Personal data beyond the information stored by cookies will only be processed by us if you yourself choose to communicate them to us, e.g. when you register with us, enter into a contractual relationship with us, or otherwise contact us. This concerns only contact details and information regarding the issues about which you approach us.

We will only use the personal data provided by you to the extent that this is necessary for fulfilling the relevant purpose of the processing (e.g. registration, sending newsletters, fulfilling an order, sending information material and advertising, processing a competition, answering a question, providing access to certain information, or processing an online payment – which will be explained again in the course of the payment) and where this is legally permissible (in particular, pursuant to Art. 6 of the EU GDPR) (e.g. sending advertising and information material to existing customers).

The purpose of the processing of your data is the operation of our website and the targeted provision of company-specific information, including the display of our range of products and services (marketing). Any further use of your data will only be made to the extent that you have given your prior express consent. You can withdraw your consent – as explained in detail below – at any time with effect for the future.

4. Retention period

Any data provided by you for the exclusive purpose of customer service and/or marketing and information purposes will generally be retained for a period of three years following our last contact. If you wish, we will also erase your data before the end of that period, unless this conflicts with our legal obligations.

In the event of initiating and/or entering into a contract, we will process your personal data, following complete fulfilment of the contract, until the end of the guarantee, warranty, limitation, and statutory retention periods applicable to us and, beyond that, until the completion of any legal disputes in which the data are required as evidence.

5. Newsletter

You have the opportunity to subscribe to our free newsletter. In this newsletter, you will receive, at regular intervals, all the current news and information about our company as well as customised advertising. You will need a valid email address to receive our newsletter.

We will check the email address entered on our registration screen as to whether the receipt of newsletters is actually wanted. This is done by us sending an email to the email address given by you, receipt of which you can confirm by clicking on the link provided. Following confirmation of the email, you will be registered for our newsletter. (Double opt-in)

When you first register for our newsletter, we will store your IP address and the date and time of your registration. This is done for security reasons, in case a third party misuses your email address and subscribes to our newsletter without your knowledge. No further data are collected or processed by us for subscribing to the newsletter; the data are used only for receiving the newsletter.

Unless you object, we will share your data within our group for the purpose of analysis and for transmitting information for advertising purposes. Within our group of companies, your data provided by you for receiving the newsletter will be checked against any data that may have been collected by us in other ways (e.g. when purchasing a product or booking a service).

Your newsletter registration data will not be shared with any third parties outside our group of companies. You can stop receiving our newsletter at any time; details of how to unsubscribe can be found in the confirmation email and in each issue of the newsletter.

6. Tools and applications used

a. We use Google Analytics, which is a web analytics service by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. This service uses cookies whose functioning is explained above. The information generated by these cookies concerning your use of this website is usually transmitted to a Google server and stored there.

Google will use this information on our behalf to analyse your use of our website, to compile reports on website activities, and to provide the operator of the website with other services relating to the use of the website and the internet. The IP address transmitted by your browser in connection with Google Analytics will not be merged with any other Google data.

You can prevent the storage of the cookies required by Google Analytics by changing the settings of your browser software accordingly; however, in this case, you may not be able to make full use of all the functions of this website. You can also prevent the collection of the data generated by the cookie and related to your use of the website (including your IP address) and their transmission and processing by Google by downloading and installing the browser plug-in available through the following link: <http://tools.google.com/dlpage/gaoptout?hl=en>

If you require further information on the type, extent, and purpose of the data collected by Google, we suggest you read their privacy policy.

<https://support.google.com/analytics/answer/6004245?hl=en>

Google will also be processing your data in the US; therefore, we have taken appropriate measures to ensure lawful data processing ('appropriate guarantees').

b. We also use Google Maps services on our website. In this way, we are able to display interactive maps directly on our website and provide you with a comfortable use of the map function to find our location and to facilitate your journey.

By your visiting our website, Google will receive the information that you have requested the relevant subsite of our website and the personal data listed under point 2. This will happen irrespective of whether or not you are logged into a Google account. If you are logged into Google, your data will be directly linked to your account. If you do not wish this, you must log out of Google before using this service. Google will use your data for the purposes of advertising, market research, and customised website design. You have the right to object to this use of your data; such objection must be made directly to Google.

Further information on the purpose and extent of the data collection can be found in Google's privacy policy, which you can find at <http://www.google.de/intl/en/policies/privacy>. Google will also be processing your data in the US; therefore, we have taken appropriate measures to ensure lawful data processing ('appropriate guarantees').

c. On our website, we also place links to other websites; this is for information purposes only. These websites are outside our control and are therefore not covered by the provisions of this Privacy Policy. However, if you click on a link, it is possible that the operator of that website will collect data concerning you and process these according to their privacy policy, which may differ from ours. Please always also check the current privacy policies of any websites linked to by us.

d. On our website, you also have the opportunity to interact with various social networks via plug-ins. These are:

- Linked In, operated by LinkedIn Inc., 2029 Stierlin Court, Mountain View, CA 94043, USA

If you click on a plug-in by one of these social networks, that plug-in will be activated and, as described above, a connection will be made to that network's server. We have no influence on the extent and content of the data transmitted to the respective operator of that social network by clicking on the plug-in.

If you wish to obtain information about the type, extent, and purpose of the data collected by the operators of these social networks, we suggest you read the privacy policy of the relevant social network.

B. Processing of data of our customers, suppliers, and interested parties for marketing purpose

Personal data of our customers and suppliers, e.g. points of contact, their contact details, and information relevant to marketing, are used by us not only for the purpose of processing contracts and in accordance with statutory retention obligations (e.g. accounting), but also jointly for marketing and customer service purposes.

In addition, we collect personal data of interested parties (e.g. points of contact, their contact details, and information relevant to marketing) in the course of our acquisition and sales activities. We are always on the look-out for potential partners on the internet, at trade fairs and at other events; and for this purpose, we maintain a marketing database allowing targeted advertising of our products and services. All of the activities listed here are carried out for the purposes of our legitimate interests for marketing purposes pursuant to point (f) of Art. 6(1) of the EU GDPR in connection with Recital 47 for a period of three years following the end of a contractual relationship (customers & suppliers) and/or our first (unsuccessful) contact (interested parties), unless there is a further express consent of the data subject.

If personal data for marketing purposes are not collected from the data subject himself/herself, we will inform the data subject at the time of first contact about where we have collected his/her data. For fiscal and administrative reasons, we have established a number of different companies, which is why we process personal data in the context of customer service and marketing (and for other purposes) as joint controllers and partly in the context of contract processing agreements. We maintain a joint marketing database.

A full list of our affiliated companies can be found in the legal notice on our website. If, in the context of an ongoing business relationship or as a result of an explicit request by an interested party, we are to deliver products and services provided by our affiliated companies, we will, for the purposes of our legitimate interests for marketing purposes, share the personal data of the interested party with those affiliated companies that provide the products and services of interest to the specific data subject.

Both we and each of our affiliated companies will store data for marketing purposes and customer service for a period analogous to that described in A.4.

C. General information on data protection

1. Data transmission

Your data will not be transmitted to third parties unless we are legally obliged to do so, or if the data transmission is necessary for the performance of a contractual relationship entered into by us, or if you have given express consent to the transmission of your data. External processors or other co-operation partners will only receive your data to the extent that this is necessary for processing the contract or if we have a legitimate interest in this, which will be communicated to you separately in each case. To the extent that one of our processors comes into contact with your personal data, we shall ensure that they will comply with the provisions of data protection legislation in the same way as we do.

Your personal data will not be sold or otherwise marketed to third parties by us. If our partners or processors have their registered office in a third country, i.e. a state outside the European Economic Area (EEA), we shall inform you of the consequences of that fact when making our offer.

2. Security

We use various technical and organisational security measures to protect your data against manipulation, loss, destruction, and access by third parties. Our security measures are subject to continuous improvement in line with technological developments on the internet. If you require further information on the type and extent of the technical and organisational measures taken by us, we shall be happy to answer your written enquiries at any time.

3. Your rights

Pursuant to the General Data Protection Regulation and the Austrian Data Protection Act, you as a data subject of our data processing have the following rights and recourse to the following remedies:

- Right of access (Art. 15 of the EU GDPR)

As a data subject of the data processing described above and any other data processing, you have the right to obtain information as to whether or not personal data concerning you are being processed and, where that is the case, which personal data concerning you are being processed. For your own protection – so that unauthorised persons do not obtain access to your data – we will verify your identity in a suitable manner before providing such information.

- Right to rectification (Art. 16) and erasure (Art. 17 of the EU GDPR)

You have the right to obtain without undue delay the rectification of inaccurate personal data concerning you and/or – taking into account the purposes of the processing – the completion of incomplete personal data, as well as the erasure of your data where the criteria of Art. 17 of the EU GDPR are met.

- Right to restriction of processing (Art. 18 of the EU GDPR)

In accordance with statutory provisions, you have the right to the restriction of the processing of all personal data collected. From the date of the application for restriction of processing, such data will only be processed with your individual consent and/or for the establishment and exercise of legal claims.

- Right to data portability (Art. 20 of the EU GDPR)

You can have the personal data provided to us transmitted to yourself or a third party without hindrance or limit.

- Right to object (Art. 21 of the EU GDPR)

You have the right to object, on grounds relating to your particular situation, at any time to the processing of personal data concerning you which are necessary for the purposes of our legitimate interests or those of a third party. Following your objection, your data will no longer be processed, unless there are compelling legitimate grounds for the processing which override your interests, rights and freedoms, or for the establishment, exercise or defence of legal claims. You can object at any time to data processing for direct marketing purposes with effect for the future.

- Withdrawal of consent

If you have separately given consent to the processing of your data, you can withdraw such consent at any time. Such withdrawal of consent affects the legitimacy of the processing of your personal data after we have been notified of such withdrawal of consent.

If you take steps to enforce your rights arising from the GDPR listed above, GENOA shall comment on the measure applied for and/or comply with the application without undue delay and no later than within one month following receipt of your application.

We shall respond to all reasonable requests within the legal framework free of charge and as quickly as possible.

Applications concerning a breach of your right of access or your rights to confidentiality, rectification or erasure must be addressed to the competent data protection authority. Its contact details are as follows:

Austrian Data Protection Authority
Barichgasse 40-42
1030 Vienna
dsb@dsb.gv.at

4. Contact details / contact person

a. Contact details of the joint controllers within the meaning of Art. 26 of the GDPR

GENOA net works IT-Beratungs GmbH

Kapuzinerstr. 84a, 4020 Linz, Austria

Phone: +43(732)774770

Fax: +43(732)7747703

Email: info@genoa.at

GENOA International GmbH

Kapuzinerstr. 84a, 4020 Linz, Austria

Phone: +43(732)774770

Email: info@international.genoa.at

GENOA News: <https://international.genoa.at/feed/>

We have made internal arrangements for all obligations in connection with the GDPR and compliance with data protection legislation to be fulfilled internally by GENOA net works IT-Beratungs GmbH. Therefore, that company shall be responsible, within the meaning of Art. 26 of the GDPR, for compliance with the rights of data subjects and the information obligations in connection with this, and shall act as a contact point for data subjects.

b. Contact details of the contact person for data protection matters

Ing. Elmar Jilka, MSC

Geschäftsführender Gesellschafter / CEO

dataprotection@GENOA.AT