

# Privacy policy

## Privacy policy according to Art. 13 DSGVO

The protection of personal data is an important concern for Siteco GmbH. Therefore, Siteco GmbH processes your personal data in accordance with the regulations of the European Data Protection Regulation (DSGVO) and the other applicable legal provisions on the protection of personal data and data security.

### 1. introduction

With the following information, we would like to give you as a "data subject" an overview of the processing of your personal data by us and your rights under the data protection laws. In principle, it is possible to use our website without entering personal data. However, if you want to use special services of our enterprise via our website, processing of personal data could become necessary. If the processing of personal data is necessary and there is no legal basis for such processing, we will generally obtain your consent.

The processing of personal data, such as your name, address or e-mail address, is always in line with the German Data Protection Regulation (DS-GVO) and in accordance with the country-specific data protection regulations applicable to "Siteco GmbH". By means of this data protection declaration, we would like to inform you about the scope and purpose of the personal data collected, used and processed by us.

As the controller, we have implemented numerous technical and organisational measures to ensure the most complete protection possible for the personal data processed via this website. Nevertheless, internet-based data transmissions can always have security gaps, so that absolute protection cannot be guaranteed. For this reason, you are also free to transmit personal data to us by alternative means, for example by telephone or by post.

### 2. person in charge

The responsible person within the meaning of the DS-GVO is:

Siteco GmbH  
Georg-Simon-Ohm-Strasse 50, 83301 Traunreut, Germany  
Phone: +49 8669 33-0  
Fax: +49 8669 33-397  
E-mail: [info@siteco.de](mailto:info@siteco.de)  
Representative of the responsible person: Ralph Hesse

### 3. data protection officer

You can reach the Data Protection Officer as follows:

Franz Obermayer  
complimant AG  
Edt 4

84558 Kirchweidach, Germany  
Tel.: +49 8683 980 3900  
E-mail: [datenschutz@complimant.de](mailto:datenschutz@complimant.de)  
Website: [www.complimant.de](http://www.complimant.de)

You can contact our data protection officer directly at any time with all questions and suggestions regarding data protection.

## **4. technology**

### **4.1 SSL/TLS encryption**

This site uses SSL or TLS encryption to ensure the security of data processing and to protect the transmission of confidential content, such as orders, login data or contact enquiries that you send to us as the operator. You can recognise an encrypted connection by the fact that the address line of the browser contains a "https://" instead of a "http://" and by the lock symbol in your browser line.

If SSL or TLS encryption is activated, the data you transmit to us cannot be read by third parties.

### **4.2 Data collection when visiting the website**

When you use our website for information purposes only, i.e. if you do not register or otherwise transmit information to us, we only collect data that your browser transmits to our server (in so-called "server log files"). Our website collects a series of general data and information each time you or an automated system access a page. This general data and information is stored in the server log files. The following can be recorded

1. Browser types and versions used,
2. the operating system used by the accessing system,
3. the website from which an accessing system arrives at our website (so-called referrer),
4. the sub-websites which are accessed via an accessing system on our website,
5. the date and time of access to the website,
6. an Internet Protocol (IP) address,
7. the Internet service provider of the accessing system.

When using this general data and information, we do not draw any conclusions about your person. Rather, this information is required in order to

1. to deliver the contents of our website correctly,

2. to optimise the content of our website and the advertising for it,
3. to ensure the permanent operability of our IT systems and the technology of our website, and
4. to provide law enforcement authorities with the information necessary for prosecution in the event of a cyber attack.

Therefore, the data and information collected will be used by us for statistical purposes only and for the purpose of increasing the data protection and data security of our enterprise so as to ensure an optimal level of protection for the personal data we process. The data of the server log files are stored separately from any personal data provided by a data subject.

The legal basis for data processing is Art. 6 para. 1 p. 1 lit. f DS-GVO. Our legitimate interest follows from the data collection purposes listed above.

## **5. disclosure of data to third parties**

Your personal data will not be transferred to third parties for purposes other than those listed below.

We will only share your personal information with third parties if:

1. you have given your express consent in accordance with Art. 6 para. 1 p. 1 lit. a DS-GVO,
2. the disclosure is permissible under Art. 6 (1) sentence 1 lit. f DS-GVO to protect our legitimate interests and there is no reason to assume that you have an overriding interest worthy of protection in not having your data disclosed,
3. in the event that there is a legal obligation for the disclosure pursuant to Art. 6 para. 1 sentence 1 lit. c DS-GVO, as well as
4. this is legally permissible and necessary according to Art. 6 para. 1 p. 1 lit. b DS-GVO for the processing of contractual relationships with you.

## **6. cookies**

### **6.1 General information about cookies**

We use cookies on our website. These are small files that are automatically created by your browser and stored on your IT system (laptop, tablet, smartphone or similar) when you visit our site. Cookies do not cause any damage to your end device and do not contain any viruses, Trojans or other malware.

Information is stored in the cookie that arises in connection with the specific end device used. However, this does not mean that we gain direct knowledge of your identity.

The use of cookies serves, on the one hand, to make the use of our offer more pleasant for you. We use so-called session cookies to recognise that you have already visited individual pages of our website. These are automatically deleted after you leave our site.

In addition, we also use temporary cookies to optimise user-friendliness, which are stored on your end device for a certain fixed period of time. If you visit our site again to use our services, it is automatically recognised that you have already been with us and which entries and settings you have made so that you do not have to enter them again.

On the other hand, we use cookies to statistically record the use of our website and to evaluate it for the purpose of optimising our offer for you. These cookies enable us to automatically recognise that you have already visited our website when you visit it again. These cookies are automatically deleted after a defined period of time.

The data processed by cookies is necessary for the aforementioned purposes to protect our legitimate interests and those of third parties in accordance with Art. 6 (1) sentence 1 lit. f DS-GVO.

Most browsers accept cookies automatically. However, you can configure your browser so that no cookies are stored on your computer or a notice always appears before a new cookie is created. However, the complete deactivation of cookies may mean that you cannot use all the functions of our website.

## **7. contents of our website**

### **7.1 Customer login**

You have the option of logging in to our website as a registered customer.

The personal data you enter during registration is collected and stored exclusively for internal use by us and for our own purposes. We may arrange for it to be passed on to one or more order processors, for example a parcel service provider, who will also use the personal data exclusively for an internal use attributable to us.

When you log in to our website, the IP address assigned by your internet service provider (ISP), the date and the time of registration are also stored. This data is stored because it is the only way to prevent misuse of our services and, if necessary, to enable us to investigate criminal offences that have been committed. In this respect, the storage of this data is necessary for our protection. As a matter of principle, this data is not passed on to third parties unless there is a legal obligation to pass it on or the passing on serves the purpose of criminal prosecution.

Your registration with voluntary provision of personal data also enables us to offer you content or services which, due to their nature, can only be offered to registered users. Registered persons are free to change the personal data provided during registration at any time or to have it completely deleted from our database.

Upon request, we will provide you at any time with information about which personal data we have stored about you. Furthermore, we will correct or delete personal data at your request, insofar as this does not conflict with any statutory retention obligations. A data protection officer named in this data protection declaration and all other employees are available to the data subject as contact persons in this context.

Your data is processed on the basis of your consent to registration and your wish to access the customer area, in accordance with Art. 6 Para. 1 lit. A DS-GVO.

## **7.2 Contact / Contact form**

Personal data is collected when contacting us (e.g. via contact form or e-mail). Which data is collected in the case of a contact form can be seen from the respective contact form.

Mandatory fields are marked with an asterisk (\*); we need this data to process your request. This data is stored and used exclusively for the purpose of answering your request or for contacting you and the associated technical administration. The legal basis for processing the data is our legitimate interest in responding to your request in accordance with Art. 6 Para. 1 lit. f DS-GVO. If your contact aims at the conclusion of a contract, the additional legal basis for the processing is Art. 6 (1) lit. b DS-GVO. Your data will be deleted after final processing of your request; this is the case if it can be inferred from the circumstances that the matter concerned has been conclusively clarified and provided that there are no statutory retention obligations to the contrary.

## **7.3 Application management / job exchange**

We collect and process the personal data of applicants for the purpose of processing the application procedure. The processing may also take place electronically. This is particularly the case if an applicant sends us the relevant application documents electronically, for example by e-mail or via a web form on the website. If we conclude an employment contract with an applicant, the transmitted data will be stored for the purpose of processing the employment relationship in compliance with the statutory provisions. If we do not conclude an employment contract with the applicant, the application documents will be automatically deleted two months after notification of the rejection decision, provided that no other legitimate interests on our part oppose deletion. Other legitimate interest in this sense is, for example, a duty to provide evidence in proceedings under the General Equal Treatment Act (AGG).

In this respect, the data processing is carried out solely on the basis of our legitimate interest pursuant to Art. 6 (1) lit. f DS-GVO.

## **7.4 Siteco iQ-App**

The SOFTWARE is specifically generated for the management of SITECO luminaires ("PURPOSE"). Within this framework, YOU can, among other things, download the technical documentation of all SITECO luminaires, or make independently feasible changes to the settings after delivery of the luminaire, as well as document the location of the luminaire. By registering an organisation and the associated users, work packages with tasks can be created and processed offline and online directly at the location of the luminaire.

[Data Protection Declaration IQ App](#)

## 8. Newsletter

### 8.1 Marketing newsletter

On our website you have the possibility to subscribe to the newsletter of our company. Which personal data is transmitted to us when ordering the newsletter is determined by the input mask used for this purpose.

We use the Cleverreach tool to send newsletters. You can find Cleverreach's privacy policy here: [Privacy Policy - CleverReach](#)

We inform our customers and business partners at regular intervals by means of a newsletter about our offers. The newsletter of our company can only be received by you if

1. You have a valid email address and
2. You register to receive the newsletter.

For legal reasons, a confirmation e-mail will be sent to the e-mail address you entered for the first time for sending the newsletter using the double opt-in procedure. This confirmation e-mail is used to check whether you, as the owner of the e-mail address, have authorized the receipt of the newsletter.

When you register for the newsletter, we also save the IP address assigned by your Internet service provider (ISP) for the IT system you are using at the time of registration and the date and time of registration. The collection of this data is necessary in order to be able to trace the (possible) misuse of your e-mail address at a later date and therefore serves as a legal safeguard.

The personal data collected during registration for the newsletter is used exclusively for sending our newsletter. In addition, subscribers to the newsletter could be informed by e-mail if this is necessary for the operation of the newsletter service or for registration, as could be the case if there are changes to the newsletter offer or if technical conditions change. The personal data collected within the scope of the newsletter service will not be passed on to third parties. The subscription to our newsletter can be canceled by you at any time. The consent to the storage of personal data, which you have given us for the newsletter dispatch, can be revoked at any time. For the purpose of revoking the consent, a corresponding link can be found in every newsletter. Furthermore, it is also possible at any time to unsubscribe from the newsletter directly on our website or to inform us of this in another way.

The legal basis for data processing for the purpose of sending the newsletter is Art. 6 Paragraph 1 (a) GDPR.

## 9. web analysis

### 9.1 Matomo Analytics

Matomo Analytics is an analysis program that can be used to analyse user flows (e.g. number of visits, pages visited, length of stay on individual pages, visitor analysis, etc.) on our website. This can be used for quality assurance and optimisation of our website. We use Matomo without cookies.

You can find more information on this as follows:  
<https://www.datenschutz.org/matomo-analytics/#muster>

## 10. advertising

### 10.1 Google (AdWords) Remarketing

Our website uses the functions of Google AdWords Remarketing, which we use to advertise this website in Google search results and on third-party websites. The provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("Google"). For this purpose, Google sets a cookie in the browser of your terminal device, which automatically enables interest-based advertising by means of a pseudonymous cookie ID and on the basis of the pages you visit.

You have given your consent to this within the meaning of Art. 6 (1) lit. a DS-GVO via our opt-in cookie banner.

Additional data processing will only take place if you have consented to Google linking your internet and app browsing history to your Google Account and using information from your Google Account to personalise ads you view on the web. In this case, if you are logged in to Google while visiting our website, Google will use your data together with Google Analytics data to create and define target group lists for cross-device remarketing. For this purpose, your personal data will be temporarily linked by Google with Google Analytics data in order to form target groups.

You can permanently deactivate the setting of cookies for advertising preferences by downloading and installing the browser plug-in available at the following link:  
[www.google.com/settings/ads/onweb/](http://www.google.com/settings/ads/onweb/)

Alternatively, you can obtain information from the Digital Advertising Alliance at the Internet address [www.aboutads.info](http://www.aboutads.info) about the setting of cookies and make settings in this regard. Finally, you can set your browser so that you are informed about the setting of cookies and decide individually about their acceptance or exclude the acceptance of cookies for certain cases or in general. If you do not accept cookies, the functionality of our website may be limited.

Google Ireland Limited, based in Ireland, is certified for the us-European data protection agreement "Privacy Shield", which ensures compliance with the level of data protection applicable in the EU.

Further information and the data protection provisions regarding advertising and Google can be viewed here: [www.google.com/policies/technologies/ads/](http://www.google.com/policies/technologies/ads/)

## 10.2 Google Optimize (A/B Testing Tool)

Our website also uses Google Optimize. Google Optimize analyses the use of different variants of our website and helps us to improve the user experience according to the behaviour of our users on the website. Google Optimize is a tool integrated into Google Analytics. Google Tag Manager is also a Google product that allows us to manage website tags through one interface. Tag Manager is a cookie-less domain and does not collect any personal data. The tool takes care of triggering other tags, which in turn may collect data. Google Tag Manager does not access this data. If a deactivation has been made at the domain or cookie level, this remains in place for all tracking tags implemented with Google Tag Manager. If you do not wish to receive interest-based advertising, you can disable Google's use of cookies for these purposes by visiting [support.google.com/ads/answer/7395996](http://support.google.com/ads/answer/7395996).

## 10.3 Google Cloud

Parts of our website use Google Cloud Hosting. Through their use, the IP address is transmitted to Google. Among other things, this applies to the luminaire configurator. To be able to use this, we need your consent. By clicking on "Accept all" in the banner, you give your consent to the use of the service.

Further information on the use of Google Cloud can be found here:

<https://cloud.google.com/privacy/gdpr?hl=de>

<https://cloud.google.com/terms/cloud-privacy-notice?hl=de>

Storage of login and lighting data in the Google Cloud on the basis of an EU standard contractual clause:

Google LLC (formerly known as Google Inc.)  
1600 Amphitheatre Parkway  
94043 Mountain View, California  
Rechenzentrum Frankfurt

# 11. plugins and other services

## 11.1 YouTube (videos)

Siteco GmbH uses a YouTube channel owned by Google Ireland Limited, Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland. We would like to point out that you use the YouTube channel offered here and its functions on your own responsibility. This applies in particular to the use of the "Discussion" function. Information on which data is processed by Google and for which purposes can be found in Google's data protection declaration:

<https://policies.google.com/privacy?hl=de&gl=de#infocollect> Siteco GmbH has no influence on the type and scope of the data processed by Google, the type of processing and use or the transfer of this data to third parties. Neither does it have any effective means of control in this respect. By using Google, your personal data will be collected, transferred, stored, disclosed and used by Google and transferred to, stored in and used in the United States, Ireland and

any other country in which Google does business, regardless of your country of residence. There is a transfer to Google-affiliated companies as well as to other trustworthy companies or persons who process them on behalf of Google. Google processes your voluntarily entered data such as name and user name, email address and telephone number. Google also processes the content that you create, upload or receive from others when using the services. This includes, for example, photos and videos that you save, documents and spreadsheets that you create, and comments that you write on YouTube videos. Google also evaluates the content you share to determine what topics you are interested in, stores and processes confidential messages you send directly to other users, and may use GPS data, wireless network information or your IP address to determine your location in order to serve you advertising or other content. For evaluation purposes, Google may use analysis tools such as Google Analytics. Siteco GmbH has no influence on the use of such tools by Google and has not been informed about such potential use. Should tools of this type be used by Google for the YouTube channel of Siteco GmbH, Siteco GmbH has neither commissioned this nor supported it in any other way. Nor will the data obtained during the analysis be made available to it. Only certain subscriber profiles can be viewed by Siteco GmbH via its account. Moreover, Siteco GmbH has no possibility to prevent or turn off the use of such tools on its YouTube channel. Finally, Google also receives information when you view content, for example, even if you have not created an account. This so-called "log data" may be the IP address, browser type, operating system, information about the website you visited previously and the pages you viewed, your location, your mobile provider, the terminal device you use (including device ID and application ID), the search terms you used and cookie information. You have options to limit the processing of your data in the general settings of your Google account. In addition to these tools, Google also offers privacy settings specific to YouTube. You can find out more about this in the guide to data protection in Google products from Google: <https://policies.google.com/technologies/product-privacy?hl=de&gl=de>

Further information on these points can be found in Google's privacy policy under the term "Privacy settings": <https://policies.google.com/privacy?hl=de&gl=de#infochoices>.

Furthermore, you have the option of requesting information via the Google data protection form:

[https://support.google.com/policies/troubleshooter/7575787?visit\\_id=637054532384299914-2421490167&hl=de&rd=2](https://support.google.com/policies/troubleshooter/7575787?visit_id=637054532384299914-2421490167&hl=de&rd=2)

Siteco GmbH also processes your data when you communicate with us via YouTube. The processing is carried out for the purposes of Siteco GmbH's public relations work in connection with the tasks assigned to it by law (Art. 6 e Para. 1 lit. e DSGVO in connection with the respective specialist law). The recipient of the data is firstly Google, where it may be passed on to third parties for their own purposes and under Google's responsibility. The recipient of publications is also the public, i.e. potentially anyone. Siteco GmbH itself does not collect any data via its YouTube channel. Also via the integration of YouTube videos of Siteco GmbH on its website (<https://www.Siteco.de>), the IP addresses of the page visitors are not transmitted to Google. In particular, no tracking of any kind takes place on the website. However, the data you enter on YouTube, in particular your user name and the content published under your account, will be processed by us insofar as we may respond to your publications under "Discussions". The data you freely publish and distribute on YouTube is thus included by Siteco GmbH in its offer and made accessible to its followers.

## **11.2 Onlyfy**

For our applicant management, we use the career portal of New Work SE ("onlyfy"). onlyfy uses cookies when you interact with the job advertisements. Further information on data use by onlyfy and objection options can be found here: <https://onlyfy.com/en/privacy-policy/>

#### Data processing purposes

This list represents the purposes of data collection and processing.

- Analysis
- Functionality
- Application
- Technologies used
- Cookies, collected
- Data

This list contains all (personal) data collected during or through the use of the service.

- First name Last name
- E-mail address
- Address
- Date of birth
- Nationality
- Telephone number
- Competences, application photo, qualifications
- Letter of motivation
- Uploaded documents
- Chat record

The legal basis for processing your data as part of the application process is your consent pursuant to Art. 6 para. 1 s. 1 lit. a DSGVO. The place of processing is the European Union. The data will be stored for up to 6 months. The data recipient is NEW WORK AUSTRIA XING kununu onlyfy GmbH, Schottenring 2-6, A - 1010 Vienna, Austria, Tel.: +43 1 393 00 30-0

Below you will find the e-mail address of the data protection officer of Onlyly: Christian Schmidt, New Work SE, Am Strandkai 1, 20457 Hamburg, Germany, e-mail: [datenschutzbeauftragter@new-work.se](mailto:datenschutzbeauftragter@new-work.se)

## 11.3 MyFonts

Siteco GmbH uses so-called web fonts (hello.myfonts.net), which are provided by Monotype Imaging Holdings Inc., 600 Unicorn Park Drive, Woburn, Massachusetts 01801 USA, for the uniform display of fonts. When a page is called up, the browser loads the required web fonts into the browser cache in order to display texts and fonts correctly. The MONOTYPE fonts are stored locally on our server. This ensures that the IP addresses of visitors to our website are not transmitted to MONOTYPE.

Siteco GmbH uses MyFonts Counter, a web analytics service provided by MyFonts Inc, 500 Unicorn Park Drive, Woburn, MA 01801, USA. Due to the licence conditions, page view tracking is carried out by counting the number of visits to the website for statistical purposes and transmitting them to MyFonts. MyFonts only collects anonymised data. If necessary, the data is passed on by activating Java Script code in your browser. To prevent the execution of Java Script code from MyFonts altogether, you can install a Java Script blocker (e.g. [www.noscript.net](http://www.noscript.net)). You can find further information on MyFonts Counter in the MyFonts data protection information at [www.myfonts.com/info/terms-and-conditions/](http://www.myfonts.com/info/terms-and-conditions/).

## 12 Consent Manager

Siteco GmbH uses the Consent technology from Usercentrics to obtain your consent for the storage of certain cookies on your end device or for the use of certain technologies and to document this in accordance with data protection regulations. The provider of this technology is Usercentrics GmbH, Sendlinger Straße 7, 80331 Munich, website: <https://usercentrics.com/de/> (hereinafter "Usercentrics").

When you enter our website, the following personal data is transferred to Usercentrics:

- Your consent(s) or the revocation of your consent(s)
- Your IP address
- Information about your browser
- Information about your terminal
- Time of your visit to the website

Furthermore, Usercentrics stores a cookie in your browser in order to be able to allocate the consents granted to you or their revocation. The data collected in this way is stored until you request us to delete it, delete the Usercentrics cookie yourself or the purpose for storing the data no longer applies. Mandatory legal storage obligations remain unaffected.

Usercentrics is used to obtain the legally required consent for the use of certain technologies. The legal basis for this is Art. 6 para. 1 lit. c DSGVO.