# Privacy Policy for visitors of our social Media Site

We know that you care about your personal data, and so do we. For this reason, we want to exercise the utmost care and common sense when processing your personal data and are also committed to protecting your privacy on the Internet. In accordance with **Art. 13 GDPR**, this privacy policy explains how we collect, process and use your personal data when you visit one of our social media pages and wish to use the functions offered there.

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# 1. Scope of the Privacy Policy and Definitions

Neutrik AG (hereinafter referred to as "Neutrik") operates as the headquarters of an international group of companies ("Neutrik Group") on

- Facebook
- Instagram
- YouTube
- LinkedIn

a social media page.

In addition to Neutrik, there is also the controller of the social media platform. This controller is also the controller and processes personal data, but we have no influence over this. Where we can exert influence, we influence the operator of the social media platform to the extent possible.

This privacy policy only covers the processing of personal data in the social media offering by Neutrik.

# 2. Who is responsible for data processing?

This data protection information applies to data processing by

Neutrik AG Im alten Riet 143 9494 Schaan Liechtenstein neutrik@neutrik.com

# 3. Who can I contact if I have questions about data protection?

Neutrik has appointed a company data protection officer who can be contacted at

Neutrik AG Head of Corporate Data Protection Im alten Riet 143 9494 Schaan Liechtenstein dataprotection@neutrikgroup.com

### 4. Meta

As part of our social media offering, we operate a fan page on Facebook and Instagram. We provide posts and information.

### 4.1. Who are Joint Controllers?

Joint Controllers for our Facebook and Instagram fan page are

### **Meta Platforms Ireland Limited**

4 Grand Canal Square D2 Dublin Ireland (hereinafter referred to as «Meta»)

and

**Neutrik AG** Im alten Riet 143 9494 Schaan Liechtenstein

(hereinafter referred to as «Neutrik»)

### 4.2. Who can I contact if I have questions about data protection?

Neutrik has appointed a company data protection officer, who can be contacted at

Neutrik AG Head of Corporate Data Protection Im alten Riet 143 9494 Schaan Liechtenstein dataprotection@neutrikgroup.com

The data protection officer of Meta can be reached at:

**Meta Platforms Ireland Limited** 

4 Grand Canal Square Grand Canal Harbour Dublin 2 Ireland

or under https://www.facebook.com/help/contact/540977946302970

### 4.3. What personal data do we process, for what purpose and on what legal basis?

### **Communication and Interaction**

For communication purposes, you can ask us questions, comment on posts and contact us. Your username and the communication text transmitted with it will be processed.

The processing of your personal data serves the purpose of communicating with you and answering questions about our shared posts.

Personal data such as documents or communication data transmitted to us via social media by private message will not be published by us, but it cannot be ruled out that the social media operator will process or publish this data.

We would like to point out that we do not wish to receive applications via messengers, such as Facebook Messenger, as these cannot guarantee the protection of your personal data as required and desired by us. We also reserve the right to delete content should this be necessary.

The legal basis for this data processing is <u>Art. 6 para. 1 lit. f GDPR (legitimate interest)</u>. Our legitimate interest lies in informing our fan page visitors about our offer and improving our social media presence to reach certain target groups.

Some of the social media providers are located in the USA and other countries outside the EU and the EEA. The data may therefore also be processed by the provider of the respective platform in countries outside the EU and the EEA. We

would like to point out that companies in these countries may be subject to data protection laws that do not offer your personal data the same level of protection as is the case in EU member states.

We would also like to point out that we have no influence on the scope, type and purpose of data processing by the provider of the social media platform. You can find more information about the processing of your data by the social media providers in the privacy policy of the respective platform provider.

### Insights

Insights are page statistics that can be used as a basis for analyzing the respective fan page on the social media channels Facebook and Instagram (hereinafter referred to as "fan page"). The insights can be used to draw conclusions about the number of users reached, how many people have shared, commented on and "liked" posts, which target group is being addressed and which type of post is most successful. Meta also provides the fan page operator with statistical information about page activity, page views, "likes", reach, post interactions, videos and page subscribers for a specific period (today, yesterday, the last 7 days or the last 28 days).

We receive statistical visitor data for our fan page from Meta via the Insights function. We cannot assign this data to a specific user, but we can use it to better analyze our fan page and adapt it to the needs and requirements of our fan page visitors.

We use this data to make our posts and activities on our fan page more attractive.

The legal basis for this data processing is <u>Art. 6 para. 1 lit. f GDPR (legitimate interest)</u>. Our legitimate interest is the provision of a visitor-oriented and visitor-friendly fan page.

Meta processes personal data through the use of cookies or the storage of IP addresses. Meta uses this data for advertising purposes and marketing research, among other things. As a result, you will receive advertising tailored to you based on your profile. You will receive this advertising on your profile and also outside of it. If you are logged in to your Facebook and/or Instagram profile, Meta also processes this data regardless of the device you are using.

Due to the constant development of social media platforms, the availability and processing of data changes, so we refer you to the above-mentioned data protection declarations of the social media platforms for further details.

You can find the Instagram Insight declaration under <u>https://help.instagram.com/788388387972460</u> You can find the Facebook Insight declaration under <u>https://de-</u> de.facebook.com/business/help/144825579583746?id=939256796236247

### **Photos and Videos**

Photos and/or videos of you will only be created and published on our social media offering if you have given us your consent in advance.

The legal basis for this data processing is <u>Art. 6 para. 1 lit. a GDPR (consent)</u>. You can revoke your consent at any time without giving reasons with effect for the future.

### 4.4. What data is processed by the operators of the Social Media channels?

On our website you will find links to the respective company websites on social media platforms. You can recognize links to the websites of social media services, for example, by the respective company logo. If you follow these links, you will reach our company presence on the respective social media platform. When you click on a link to such a platform, a connection to the platform's servers is established. This tells the platform's servers that you have visited our website.

In addition, further data is transmitted to the provider of the platform. This may include the following data:

Address of the website on which the activated link is located

- Date and time the website was accessed or the link was activated
- Information about the browser and operating system used
- IP address

We expressly point out that the social media provider stores the data (e.g. IP address, preferences and personal interests, behavior on the platform, any personal information stored on the platform, etc.) of users and uses it for business purposes.

We would like to point out that the respective operator of the social media platform uses web tracking methods. We would also like to point out that web tracking can also take place regardless of whether you are logged in and/or registered with the social media platform. It is not possible for us to influence the web tracking methods of the platforms. If, for example, you wish to deactivate web tracking, you must arrange this on the respective operator's website.

If you are a member of the social media channels and are logged into your user account, the social media provider can assign the visit to our site to your user account. If you would like to prevent the provider from linking data about your visit to our fan page with your membership data stored on the platform, you must

- log out of the social media platform before each visit to our fan page
- delete the cookies stored on your device
- and close and restart your browser.

In this way, according to the social media providers, all information that can be used to identify you by social media providers will be deleted.

It cannot be ruled out that the provider of the social media platform may use your data to create a profile about you and thus generate customized advertising for you, for example.

For further information on data processing by the provider of the social media platform and other options to object, you can view the privacy policies of the respective operators here:

- Instagram: <u>https://help.instagram.com/155833707900388</u>
- Facebook: <u>https://de-de.facebook.com/privacy/policy/</u>

### 4.5. Joint Responsibility

#### Joint Controllership Agreement

A joint controllership agreement has been concluded with Meta to define the respective responsibilities for fulfilling the obligations under the GDPR with regard to joint processing (as set out in the Terms of Use for Covered Products);

Furthermore, it has been agreed with Meta that Neutrik is responsible for providing data subjects with at least the information in the present scope and Meta is responsible for enabling the rights of data subjects under Articles 15-20 of the GDPR with regard to the personal data stored by Meta following the joint processing.

You can find this under https://www.facebook.com/legal/controller addendum

For more information on how Meta processes personal data, including the legal basis on which Meta relies and how data subjects can exercise their rights against Meta, please refer to Meta's Privacy Policy at https://www.facebook.com/about/privacy. (For more information on joint processing, please refer to the Terms of Use for Covered Products).

### **Delimitation of Responsibility**

The primary responsibility under the GDPR for the processing of Insight data lies with Meta. Meta fulfills all obligations under the GDPR with regard to the processing of Insight Data. Meta makes the essence of the Page Insight Supplement

available to the data subjects. Neutrik, as the operator of the fan page, **does not make any decisions** regarding the processing of Insight data and all other information resulting from Art. 13 GDPR, including the legal basis, identity of the controller and storage duration of cookies on user terminals.

### **Privacy Policy of Instagram**

You can find Instagram's privacy policy at <a href="https://help.instagram.com/155833707900388?cms">https://help.instagram.com/155833707900388?cms</a> id=155833707900388&published only=true&force new ighc=fals

#### **Privacy Policy of Facebook**

You can find Facebook's privacy policy at <a href="https://de-de.facebook.com/privacy/policy/?entry">https://de-de.facebook.com/privacy/policy/?entry</a> point=data policy redirect&entry=0

#### Settings for the processing of personal data

You can find the setting options for processing your personal data at Instagram at <u>https://de-de.facebook.com/privacy/policy/?entry\_point=data\_policy\_redirect&entry=0</u>

### **Rights of Data Subjects**

The rights of data subjects (see point 7.), namely the right to access, information and data portability, can be asserted at both Neutrik and Meta.

#### **Inquiries about Instagram Insights**

Requests from data subjects and supervisory authorities will be forwarded to Meta as agreed.

### 4.6. What rights do you have as a data subject?

As data subject you have the following rights

- Right of Access acc. to Art. 15 GDPR
- Right to Rectification acc. to Art. 16 GDPR
- Right to Erasure acc. to Art. 17 GDPR
- Right to Restriction of Processing acc. to Art. 18 GDPR
- Right of Data Portability acc. to Art. 20 GDPR
- Right to withdraw a consent acc. to Art. 7 GDPR
- Right to Object acc. To Art. 21 GDPR
- Right to a non-automated decision acc. to Art. 22 GDPR
- Right to lodge a claim with at supervisory authority acc. to Art. 77 GDPR

NOTE – If you wish to exercise your rights with regard to processing operations for which Neutrik is the sole controller within the meaning of the GDPR, please also refer to point 7 of our Social Media Policy.

# 5. YouTube

As part of our online offering, we operate a social media channel on the YouTube platform. We make videos available there. These can be played directly via our YouTube channel.

### 5.1. Who can I contract if I have questions about data protection?

Neutrik has appointed a company data protection officer, who can be contacted at

Neutrik AG Head of Corporate Data Protection Im alten Riet 143 9494 Schaan Liechtenstein <u>dataprotection@neutrikgroup.com</u>

You can contact Google's data protection officer at

Google Ireland Limited Gordon House Borrow St Dublin 4 Ireland

or at https://policies.google.com/privacy?hl=de#enforcement

### 5.2. What personal data do we process, for what purpose and on what legal basis?

### Advertising Purposes

For information purposes regarding our products, innovations for customers and interested parties, you can access videos provided by us via our YouTube channel. We have embedded our videos in "extended data protection mode". Due to the "embedded data protection mode", data processing only occurs when you "click to play the video" and the following personal data in particular can be processed by you:

- IP address
- Date and time of the request
- Time zone difference to Greenwich Mean Time
- Content of the request
- Access status/http status code
- Amount of data transferred
- Website from which the request was made
- Browser history
- Operating system and its interface
- Language and version of the browser software
- Hardware used
- GPS and other sensor data from your device
- Information about objects in the vicinity of your device
- Reference URL
- Content and advertisements that you view and interact with
- Purchase activities
- Voice and audio data

The processing of your personal data serves to provide information about our products (new products) and to present ourselves.

The legal basis for this data processing is <u>Art. 6 para. 1 lit. f GDPR (legitimate interest)</u>. Our legitimate interest lies in supporting our website in order to better reach certain target groups. Neutrik considers this offer to be necessary. Due to advancing digitalization, more and more people are turning to social media as their primary source of information.

### Settings for the processing of personal data

You can find the settings options for processing personal data at <u>https://www.youtube.com/intl/ALL\_de/howyoutubeworks/user-settings/privacy/</u>

# 5.3. What data is processed by the operators of the social media channels?

On our website you will find links to the respective company websites on social media platforms. You can recognize links to the websites of social media services, for example, by the respective company logo. If you follow these links, you will reach our company presence on the respective social media platform. When you click on a link to such a platform, a connection to the platform's servers is established. This tells the platform's servers that you have visited our website.

In addition, further data is transmitted to the provider of the platform. This may include the following data:

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

We expressly point out that the social media provider stores the data (e.g. IP address, preferences and personal interests, behavior on the platform, any personal information stored on the platform, etc.) of users and uses it for business purposes.

We would like to point out that the respective operator of the social media platform uses web tracking methods. We would also like to point out that web tracking can also take place regardless of whether you are logged in and/or registered with the social media platform. It is not possible for us to influence the web tracking methods of the platforms. If, for example, you wish to deactivate web tracking, you must arrange this on the respective operator's website.

If you are a member of the social media channels and are logged into your user account, the social media provider can assign the visit to our site to your user account. If you would like to prevent the provider from linking data about your visit to our fan page with your membership data stored on the platform, you must

- log out of the social media platform before each visit to our fan page
- delete the cookies stored on your device
- and close and restart your browser.

In this way, according to the social media providers, all information that can be used to identify you by social media providers will be deleted.

It cannot be ruled out that the provider of the social media platform may use your data to create a profile about you and thus generate customized advertising for you, for example.

For further information on data processing by the provider of the social media platform and other options to object, you can view the privacy policies of the respective operators here:

YouTube: <u>https://policies.google.com/privacy?hl=en-GB</u>

### 5.4. Notice

Neutrik would like to point out that Google Dublin, Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland, is responsible for any further processing on our YouTube channel, over which we have no influence. Neutrik also has no lasting knowledge of this and has no effective means of monitoring it. Further information on the processing of personal data by YouTube can be found here:

- YouTube Terms of use: <u>https://www.youtube.com/static?template=terms</u>
- YouTube Privacy Policy: <u>https://policies.google.com/privacy?hl=en-GB</u>

# 6. LinkedIn

As part of our online offering, we operate a social media channel on the LinkedIn platform. We only process your personal data when you contact us via the LinkedIn platform or apply for a job advertised on LinkedIn. If you apply to Neutrik via an advertised position on LinkedIn, LinkedIn collects your personal data and makes it available to us.

### 6.1. Contact Data

**LinkedIn Ireland Unlimited Company** Wilton Place Dublin 2 Irland

(hereinafter referred to as «LinkedIn»)

and **Neutrik AG** Im alten Riet 143 9494 Schaan Liechtenstein

(hereinafter referred to as «Neutrik»)

### 6.2. Who can I contact if I have questions about data protection?

Neutrik has appointed a company data protection officer, who can be contacted at

Neutrik AG Head of Corporate Data Protection Im alten Riet 143 9494 Schaan Liechtenstein dataprotection@neutrikgroup.com

You can contact LinkedIn's data protection officer at:

LinkedIn Ireland Unlimited Company

Wilton Place Dublin 2 Irland

or at https://www.linkedin.com/help/linkedin/ask/ppg

# 6.3. What personal data is processed, for what purpose and on what legal basis?

### **Communication and Interaction**

For communication purposes, you can ask us questions, comment on posts and contact us. Your user name and the communication text transmitted with it will be processed. The data entered

The processing of your personal data serves the purpose of communicating with you and answering questions about our shared posts.

Personal data transmitted to us via social media by private message, such as documents or communication data, will not be published by us, but it cannot be ruled out that the social media operator will process or publish this data.

The legal basis for this data processing is Art. 6 para. 1 lit. f GDPR (legitimate interest).

Some of the social media providers are located in the USA and other countries outside the EU and the EEA. The data may therefore also be processed by the provider of the respective platform in countries outside the EU and the EEA. We would like to point out that companies in these countries may be subject to data protection laws that do not offer your personal data the same level of protection as is the case in EU member states.

We would also like to point out that we have no influence on the scope, type and purpose of data processing by the provider of the social media platform. You can find more information about the processing of your data by the social media providers in the privacy policy

### **Recruiting purposes**

Depending on the individual case, we process your personal data for the purpose of informing you about potential job opportunities at Neutrik.

The following personal data is collected from you as part of the recruitment process to create a LinkedIn account:

- First name
- Surname
- E-Mail-address
- Mobile phone number (optional)
- Selected password
- Payment/billing information (for premium services)
- Other personal data that you voluntarily publish on your LinkedIn profile
- Without a LinkedIn account or when using the services:• Usage data
- Login data
- Device information
- IP address
- Cookies (if they have been accepted voluntarily)
- Location
- Proxy server
- Operating system
- Web browser
- Internet/mobile provider
- Device recognition/functions
- URL of the website you visited previously and visit afterwards
- Time of day
- Other personal data that you voluntarily publish on your LinkedIn profile

The processing of your personal data serves to interact with your inquiry or to process your application. The legal basis for this data processing is <u>Art. 6 para. 1 lit. b GDPR (pre-) contractual measures</u>). In the case of an application, the processing of your personal data is governed by our <u>Privacy Note for Applicants</u>

If you have given your consent to LinkedIn for the processing of your personal data with us, <u>Art. 6 para. 1 lit. a GDPR</u> (consent) is the legal basis.

### 6.4. What data is processed by the operators of the social media channels?

On our website you will find links to the respective company websites on social media platforms. You can recognize links to the websites of social media services, for example, by the respective company logo. If you follow these links, you will reach our company presence on the respective social media platform. When you click on a link to such a platform, a connection to the platform's servers is established. This tells the platform's servers that you have visited our website.

In addition, further data is transmitted to the provider of the platform. This may include the following data:

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

We expressly point out that the social media provider stores the data (e.g. IP address, preferences and personal interests, behavior on the platform, any personal information stored on the platform, etc.) of users and uses it for business purposes.

We would like to point out that the respective operator of the social media platform uses web tracking methods. We would also like to point out that web tracking can also take place regardless of whether you are logged in and/or registered with the social media platform. It is not possible for us to influence the web tracking methods of the platforms. If, for example, you wish to deactivate web tracking, you must arrange this on the respective operator's website.

If you are a member of the social media channels and are logged into your user account, the social media provider can assign the visit to our site to your user account. If you would like to prevent the provider from linking data about your visit to our fan page with your membership data stored on the platform, you must

- log out of the social media platform before each visit to our fan page
- delete the cookies stored on your device
- and close and restart your browser.

In this way, according to the social media providers, all information that can be used to identify you by social media providers will be deleted.

It cannot be ruled out that the provider of the social media platform may use your data to create a profile about you and thus generate customized advertising for you, for example.

For further information on data processing by the provider of the social media platform and other options to object, you can view the privacy policies of the respective operators here:

LinkedIn: <u>https://www.linkedin.com/legal/privacy-policy</u>?

### 6.5. <u>Notice</u>

Neutrik would like to point out that LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland is responsible for any further processing on our LinkedIn social media channel. We ourselves have no influence on this. Neutrik also has no lasting knowledge of this and has no effective means of monitoring it. Further information on the processing of personal data by LinkedIn can be found here:

User Agreement LinkedIn http://www.linkedin.com/legal/user-agreement?trk=lithograph\_footer-user-agreement

Community Policies <u>https://www.linkedin.com/legal/professional-community-policies</u>?

Cookie Policy <a href="https://de.linkedin.com/legal/cookie-policy">https://de.linkedin.com/legal/cookie-policy</a>?

### 6.6. Joint Responsibility

#### Agreement on Joint Responsibility

A joint responsibility agreement has been concluded with LinkedIn. You can access this at <a href="https://legal.linkedin.com/pages-joint-controller-addendum">https://legal.linkedin.com/pages-joint-controller-addendum</a>

#### **Delimitation of Responsibility**

The primary responsibility under the GDPR for the processing of personal data lies with LinkedIn and LinkedIn fulfills all obligations under the GDPR with regard to the processing of personal data. LinkedIn provides the essence of the Page Insight supplement to the data subjects. Neutrik **does not make any decisions** regarding the processing of personal data and all other information resulting from Art. 13 GDPR, including legal basis, identity of the controller and storage duration of cookies on user end devices.

#### **LinkedIn Privacy Policy**

Here you can find LinkedIn's privacy policy: https://de.linkedin.com/legal/privacy-policy

#### Settings for Processing of Personal Data

The settings options for processing your personal data at LinkedIn can be found at <u>https://de.linkedin.com/legal/privacy-policy?trk=d\_org\_quest\_company\_overview\_footer-privacy-policy#choices</u>

#### **Rights of Data Subjects**

The rights of data subjects (see point 7.), namely the right to access, information and data portability, can be asserted at both Neutrik and LinkedIn.

### **Requests for LinkedIn Insights**

Requests from data subjects and supervisory authorities will be transmitted to LinkedIn as agreed.

#### Legitimate Interest

The legal basis for our use of social media channels is <u>Art. 6 para. 1 lit. f GDPR (legitimate interest</u>). The legitimate interest lies in the provision and improvement of the social media presence. In addition, our legitimate interest lies in providing information, in particular to recruit new employees. Neutrik sees this offer as necessary, as many qualified applicants are switching to the digital space due to digitalization and use LinkedIn as a primary source of information and application source.

### 6.7. What rights (in data protection) do you have?

#### Right to information acc. to Art. 15 GDPR

You have the right to request confirmation from the controller at any time as to whether personal data concerning you is being processed.

#### Right to rectification acc. to Art. 16 GDPR

You have the right to request confirmation from the controller at any time as to whether personal data concerning you is being processed.

### Right to erasure acc. to Art. 17 GDPR

If the personal data you have provided above is no longer necessary for the purpose of processing, the consent you have given for processing is withdrawn and there is no other reason for further processing, you can exercise your right to erasure and if there are no overriding legitimate grounds for further processing, you can request the erasure of your data.

#### Restriction of processing acc. to Art. 18 DGPR

If the accuracy of the personal data processed by you is disputed and the processing is unlawful, you can request the controller to restrict the processing.

### Right to Data Portability acc. to Art. 20 GDPR

If the accuracy of the personal data processed by you is disputed and the processing is unlawful, you can request the controller to restrict the processing.

### Right to object acc. to Art. 21 GDPR

If your personal data is processed in the public interest or to protect the legitimate interests of the controller or a third party, you can object to this at any time.

#### Withdrawal of consent acc. to Art. 7 GDPR

You can withdraw your consent at any time, without giving reasons, with effect for the future. The lawfulness of the processing of your personal data, which was processed on the basis of your consent up to the time of revocation, is not affected by the revocation.

### Right to lodge a complaint acc. to Art. 77 GDPR

If you believe that the processing of your personal data violates legal provisions, you have the right to lodge a complaint with your local supervisory authority. Here you can find the competent authority: <u>https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index en.htm</u>

# 7. Information about your right to object acc. to Art. 21 GDPR

### Individual right to object pursuant to Art. 21 para. 1 GDPR

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on Art. 6 para. 1 lit. f GDPR (legitimate interest); if you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

#### Neutrik Aktiengesellschaft

Version 2 | last updated at February 15, 2024