

PRIVACY POLICY

PAL Next AG

With the following privacy policy, we would like to inform you about how we process your personal data. The privacy policy applies to all processing of personal data carried out by us in connection with our presence on social networks (social media).

1. Responsible entity

Responsible within the meaning of the GDPR is

PAL Next AG
represented by: Stephanie Schettler-Köhler
Holzstrasse 30
D-80469 Munich
Phone: +49-89-23238550
E-Mail: contact@pal-next.com

2. Data protection officer

You can contact our data protection officer as follows:

PAL Next AG
Holzstrasse 30
D-80469 Munich
E-mail: datenschutz@pal-next.com

You can contact our data protection officer directly at any time with any questions or suggestions regarding data protection and the exercise of your rights.

3. Definition

This privacy policy is based on the terminology of the GDPR. To simplify matters, we would like to explain some important terms in this context in more detail:

- **Personal data:** Personal data is any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

- **Data subject:** Data subject is any identified or identifiable natural person whose personal data is processed by the controller responsible for the processing.
- **Processing:** Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **Recipient:** A recipient is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients.
- **Third party:** A third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

4. Presence in social networks (social media)

We maintain publicly accessible profiles on various social networks. Your visit to these profiles triggers a variety of data processing operations. Below we provide you with an overview of which of your personal data we process when you visit our profiles.

When you visit our profiles, your personal data is not only processed by us, but also by the operators of the respective social network. This happens even if you yourself do not have a profile on the respective social network. The individual data processing operations and their scope differ depending on the operator of the respective social network and they are not necessarily traceable for us.

For details on the processing of your personal data and the type, scope and purpose of its use by the operator of the respective social network, please refer to the privacy policies of the respective operators:

- [LinkedIn privacy policy](#)
- [Privacy policy of X \(formerly: Twitter\)](#)

4.1. LinkedIn

When you visit our LinkedIn company profile, certain information about you is processed. In the case of direct messages to us or comments on our LinkedIn company profile or under our posts, we receive the message, the comments and your user name.

In addition, when you visit our LinkedIn company profile, LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland ("LinkedIn") processes your data for the provision of services, communication, further development of services and research, as well as for advertising, customer support, analysis and security purposes. LinkedIn is solely responsible for this processing of personal data.

The categories of personal data that LinkedIn processes are described in LinkedIn's data policy at

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

Further information on the processing of personal data by LinkedIn can be found at:

- https://www.linkedin.com/legal/privacy-policy?trk=homepage-basic_footer-privacy-policy

When you visit our LinkedIn company profile, follow this page or engage with the page, LinkedIn processes personal data to provide us with statistics and insights in anonymized form. This gives us insights into the types of actions that people take on our site (page insights). In particular, LinkedIn processes data that you have already provided to LinkedIn via the information in your profile, such as data on function, country, industry, seniority, company size and employment status. In addition, LinkedIn will process information about how you interact with our LinkedIn company profile, e.g. whether you are a follower of our LinkedIn company page. With the Page Insights, LinkedIn does not provide us with any personal data about you. We only have access to the summarized Page Insights. It is also not possible for us to draw conclusions about individual members from the information in the Page Insights.

This processing of personal data in the context of Page Insights is carried out by LinkedIn and us as joint controllers. We have entered into an agreement with LinkedIn on processing as joint controllers, which sets out the distribution of data protection obligations between us and LinkedIn. The agreement is available at

- <https://legal.linkedin.com/pages-joint-controller-addendum>

The processing of your personal data in connection with the operation of our LinkedIn company profile is based on a balancing of interests in accordance with Art. 6 I S. 1 lit. f GDPR in order to offer you a contemporary and supportive information and interaction opportunity with and about us. Furthermore, the processing serves our legitimate interest in evaluating the types of actions taken on our LinkedIn company profile and improving our company profile based on these findings. The legal basis for this processing is therefore Art. 6 I S. 1 lit. f GDPR. If the contact is aimed at the conclusion of a contract, the legal basis for the processing is Art. 6 I S. 1 lit. b GDPR.

Please note that in accordance with the LinkedIn Privacy Policy, personal data is also processed by LinkedIn in the USA or other third countries.

4.2. X (formerly: Twitter)

We operate an "X-Profile" to draw attention to our services and service offerings and to interact with you and visitors to the X-Profile.

If you contact us via the X profile, e.g. by commenting on a post or sending us a message via X direct messages, we will process your data (e.g. your name and the content of the communication) in order to deal with your request.

In addition, Twitter International Unlimited Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX 07 Ireland ("X") also processes your data when you visit our X profile or profiles within the X platform. This includes your IP address, the application used, information about your end device (including device ID and application ID), information about websites visited, your location and your mobile phone provider. This data is assigned to the data of your X account or your Twitter profile. X also uses certain data that it has collected from users of the X platform (e.g. "re-tweets") to compile aggregated usage statistics and make them available to the respective operators of the X profile (X Analytics). We also receive aggregated usage statistics. The information we receive from X-Analytics does not allow any conclusions to be drawn about individual users. We ourselves have no access to personal data that X processes for X-Analytics. X determines which data is processed for X-Analytics and how. We have no legal or actual influence on the processing by X. X provides information on this in X's privacy policy (X Privacy Policy) and via the option to view your own data at X (X Help Center).

Further information about the processing of personal data by X can be found at:

- <https://twitter.com/de/privacy>

The processing of your personal data in connection with the operation of our X- company profile is based on a balancing of interests in accordance with Art. 6 I S. 1 lit. f GDPR in order to offer you a contemporary and supportive information and interaction opportunity with and about us. Furthermore, the processing serves our legitimate interest in evaluating the types of actions taken on our X- company profile and improving our company profile based on these findings. The legal basis for this processing is therefore Art. 6 I S. 1 lit. f GDPR. If the contact is aimed at the conclusion of a contract, the legal basis for the processing is Art. 6 I S. 1 lit. b GDPR.

Please note that, in accordance with the X Privacy Policy, personal data is also processed by X in the USA or other third countries.

5. Transmission of personal data

As part of our processing of personal data, data may be transmitted to other bodies, companies, legally independent organizational units or persons or disclosed to them. The recipients of this data may include, for example, service providers commissioned with IT tasks or providers of services and content that are integrated into a website. In such cases, we observe the legal requirements and, in particular, conclude corresponding contracts or agreements with the recipients of your data that serve to protect your data.

6. Deletion of data

The data processed by us will be deleted in accordance with the legal requirements as soon as the consents permitted for processing are revoked or other permissions cease to apply (e.g. if the purpose of processing this data no longer applies or it is not required for the purpose). If the data is not deleted because it is required for other and legally permissible purposes, its processing will be restricted to these purposes. This means that the data is blocked and not processed for other purposes. This applies, for example, to data that must be retained for commercial or tax law reasons or whose storage is necessary for the assertion, exercise or defense of legal claims or to protect the rights of another natural or legal person.

Our data protection notices also contain further information on the retention and deletion of data, which apply primarily to the respective processing operations.

7. Your rights as a data subject

As a data subject, you are entitled to various rights under the GDPR, which arise in particular from Art. 15 to 21 GDPR. If you wish to exercise one of your rights, please contact us via the contact addresses given above or our data protection officer.

7.1. Right of objection

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 point e) or f) of Article 6 I GDPR, including profiling based on those provisions. If the personal data concerning you are processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing. 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 the processing serves the establishment, exercise or defense of legal claims.

7.2. Right to information

You have the right to request confirmation as to whether the data in question is being processed and to request information about this data as well as further information and a copy of the data in accordance with the legal requirements.

7.3. Right to rectification

In accordance with the legal requirements, you have the right to request the completion of data concerning you or the correction of incorrect data concerning you.

7.4. Right to erasure and restriction of processing

You have the right to obtain from us the erasure of personal data concerning you without undue delay where one of the grounds provided for by law applies and insofar as the processing or storage is not necessary.

7.5. Restriction of processing (Art. 18 GDPR)

You have the right to demand that we restrict processing if one of the legal requirements is met.

7.6. Right to data portability

You have the right to receive the data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format in accordance with the legal requirements or to request its transmission to another controller.

7.7. Right to withdraw consent

You have the right to withdraw your consent at any time.

7.8. Complaint to the supervisory authority

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the provisions of the GDPR.

8. Amendment and updating of the privacy policy

We will adapt the privacy policy as soon as changes to the data processing carried out by us make this necessary. We will inform you as soon as the changes require an act of cooperation on your part (e.g. consent) or other individual notification.

If we further develop our website and our offers or if legal or official requirements change, it may be necessary to amend this data protection notice. You can access the current data protection information at any time [here](#).

Status: September 2024