# **Privacy policy**

### Last updated: September 2025

Any collection, use, storage, deletion or other utilization (hereinafter referred to as "processing") of data serves exclusively to provide our services. Our services have been designed with the aim of using as little personal data as possible. The term "personal data" (hereinafter also referred to as "data") refers to all individual details about personal or factual circumstances of an identified or identifiable natural person ("data subject").

The following information on data protection describes which types of personal data are processed when you visit our website, what happens to this personal data and how you can object to data processing if necessary.

# 1 General information on data processing on this website

# 1.1 Note on joint controllers (Art. 26 para. 2 GDPR)

In the following, we inform you about the main aspects of data processing concerning you on the website <a href="https://www.lennertz.com">www.lennertz.com</a>, which is under the joint responsibility of the following controllers.

Controller 1: Lennertz & Co. GmbH

Controller 2: Lennertz & Co. Family Office GmbH
Controller 3: Lennertz & Co. Private Equity GmbH

Controller 4: Lennertz & Co. Capital GmbH
Controller 5: Lennertz & Co. Finance GmbH

Controller 6: Lennertz & Co. Administration GmbH

The joint contact details of the controllers are:

**Address:** Düsternstrasse 10,

20355 Hamburg

**Phone:** +49 40 210 91 33-20

**E-mail:** info@lennertz.com

# 1.2 Object and purpose of joint data processing

The purpose of data processing is the joint organization and design of this website, the products, personnel administration, customer administration and the associated processing activities.

# 1.3 Responsibilities

The responsibilities with regard to the main agreements is as follows:

Responsibility	Controller
Information in accordance with Art. 13, 14 GDPR	Controller 1
Processing of data subject rights in accordance with Chapter 3 GDPR	Controller 1

#### 1.4 **Assertion of your rights**

Irrespective of the allocation of responsibility, you can assert your rights under Art. 26 para. 3 GDPR against any controller. However, to enable the most efficient handling of your request, we recommend that you contact the responsible entity directly.

#### 1.5 **Data protection officer**

The data protection officer is Anna Tiede from WS Datenschutz GmbH.

If you have any questions about data protection, you can contact WS Datenschutz GmbH at the following e-mail address:

lennertz@ws-datenschutz.de

WS Datenschutz GmbH Dircksenstrasse 51 10178 Berlin, Germany

https://webersohnundscholtz.de



#### 1.6 **Protection of your data**

We have taken technical and organizational measures to ensure that the provisions of the GDPR are observed both by us and by external service providers who work for us.

If we work with other companies, such as e-mail and server providers, to provide our services, this is only done after an extensive selection process. In this selection process, each individual service provider is carefully selected for its suitability in connection with technical and organizational skills in data protection. This selection procedure is documented in writing and a contract pursuant to Art. 28 para. 3 GDPR on the processing of personal data on behalf of the controller (data processing agreement) is only concluded if it meets the requirements of Art. 28 GDPR.

Your data is stored on specially protected servers. Access to it is only possible for a few specially authorized persons.

Our website is SSL/TLS encrypted, which you can recognize by the "https://" at the beginning of the URL.

#### 1.7 Erasure of personal data

We only process personal data for as long as is necessary. As soon as the purpose of the data processing has been fulfilled, the data is blocked and erased in accordance with the standards of the organization's deletion concept, unless statutory provisions prevent deletion.

# 2 Data processing on this website and creation of log files

# 2.1 Description and scope of data processing

When you visit our website, our web servers temporarily store each access in a log file. The following personal data is collected and stored until it is automatically deleted:

- IP address of the requesting computer
- Date and time of access
- Name and URL of the retrieved file
- Identification data of the browser and operating system used
- Website from which the access is made
- Type of device used

In addition to this personal data, further personal data may be collected by us and our partners; more on this below.

We use the service provider 1 & 1 Telecom GmbH as our hosting provider. The data processing is carried out by:

1 & 1 Telecom GmbH, Elgendorfer Str. 57, 56410 Montabaur, Germany. Additional information on data protection at the service provider can be found at <a href="https://www.lundl.de/Datenschutz">https://www.lundl.de/Datenschutz</a>

# 2.2 Legal basis for data processing

This data is processed on the basis of Art. 6 para. 1 sentence 1 lit. f) GDPR. Our legitimate interest is based on making our website accessible to you.

### 2.3 Purpose of data processing

Data processing is carried out for the purpose of enabling the use of the website (connection establishment). It is used for system security, technical administration of the network infrastructure and optimization of the website. The IP address is only analyzed in the event of attacks on our network infrastructure or the network infrastructure of our internet provider.

# 2.4 Duration of data storage

The personal data will be erased as soon as it is no longer required for the above-mentioned purposes. This is the case when you close the website. Our hosting provider may use the data for statistical surveys. However, the data is anonymized for this purpose. The data will be deleted by our hosting provider after 8 weeks.

# 2.5 Possibility of removal by the data subject

The website can only be displayed if the described data is processed. To object to the further processing of the data, please contact our data protection officer or the hosting provider at <a href="mailto:dataercond-data

# 3 Use of cookies

# 3.1 Description and scope of data processing

Our website uses cookies. These are stored on your computer when you use our website. Cookies are small text files that are saved to your hard drive and assigned to your browser. They provide us, or the party that sets the cookie, with specific information. Cookies cannot run programs or transfer viruses to your computer. They are used by us to

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uniquely identify each user session in order to analyze the use of our website and to present you with interesting offers on this website. Various data can be transmitted in this way:

- Frequency of website visits
- What website services you utilize
- Search terms used
- Your cookie setting
- Your language setting

When you access the website, a consent banner informs you about the use of cookies and refers you to the privacy policy.

# 3.2 Legal basis for data processing

The legal basis for the processing of data via cookies that do not solely serve the functionality of our website is Art. 6 para. 1 sentence 1 lit. a) GDPR.

The legal basis for data processing for cookies which are used solely for the functionality of this website is Art. 6 para. 1 sentence 1 lit. f) GDPR.

# 3.3 Purpose of data processing

Our legitimate interest arises from ensuring a smooth connection to and comfortable use of our website as well as for reasons of evaluating system security and stability. Data processing also takes place in order to enable a statistical evaluation of website usage.

### 3.4 Duration of data storage

There are two types of cookies. Both are used on this website:

- Transient cookies (see a)
- Persistent cookies (see b)
- a) **Transient cookies** are automatically deleted when you close the browser. In particular, they include session cookies. These cookies save a session ID that enables multiple requests from your browser to be associated with a shared session. This allows your computer to be recognized when you return to our website. The session cookies are deleted when you log out or close the browser.
- b) **Persistent cookies** are automatically deleted after a specified period, which may vary depending on the cookie.

# 3.5 Possibility of removal by the data subject

You have the option at any time to withdraw your consent to data processing by cookies that are not solely used for the functionality of the website. In addition, we only set cookies after you have consented to the setting of cookies when you access the site. In this way, you can prevent data processing via cookies on our website.

You can also delete the cookies in the security settings of your browser at any time. We would like to point out that you may not be able to use all functions of this website if you do so. The setting of cookies can also be prevented at any time by making the appropriate settings in your Internet browser.

### 3.6 Usercentrics CMP

# 3.6.1 Description and scope of data processing

We use the provider Usercentrics for our website. The data processing is carried out by: Usercentrics GmbH, Sendlinger Strasse 7, 80331 Munich, Germany.

Usercentrics is a Consent Management Platform (CMP) that helps websites to be privacy compliant by managing user consent to the processing of personal data, in particular through cookies and trackers. The platform collects and stores information about user preferences, allows users to give or decline consent, and reports on consent decisions. By integrating with various website technologies, Usercentrics ensures that only the data processing for which users have given their consent takes place and supports websites in complying with the General Data Protection Regulation (GDPR) and other data protection laws. For further information on data protection, please refer to the Usercentrics data policy below: <a href="https://usercentrics.com/de/datenschutzerklaerung">https://usercentrics.com/de/datenschutzerklaerung</a>

# 3.6.2 Legal basis for data processing

The legal basis is based on Art. 6 para. 1 sentence 1 lit. a) GDPR.

# 3.6.3 Purpose of data processing

The Usercentrics Consent Management Platform (CMP) provides transparency about all cookie usage and tracking technologies on our website.

### 3.6.4 Duration of data storage

Your data will be processed by Usercentrics only for as long as necessary to fulfill its purpose and as long as there are no legal or official retention obligations that prevent its deletion.

# 3.6.5 Possibility of removal by the data subject

You can request that Usercentrics GmbH delete your data by sending an e-mail to <u>datenschutz@usercentrics.com</u> to request deletion.

# 4 Contact

# 4.1 Description and scope of data processing

It is possible to contact us by e-mail via our website. You can also contact us by fax (+49 40 210 91 33-21) or by post. For this purpose, various data are required to answer the request, which are automatically stored for processing. At a minimum, the following data are collected when you get in touch with us:

- E-mail: E-mail address
- Fax: Fax number and, if applicable, address or company name
- Postal: Last name, first name, address

The data will not be disclosed to third parties.

# 4.2 Legal basis for data processing

The legal basis used here is Art. 6 para. 1 sentence 1 lit. b) GDPR.

# 4.3 Purpose of data processing

We process your data exclusively in order to process your contact request.

# 4.4 Duration of data storage

Your data will be deleted by us as soon as the purpose of the data processing has been fulfilled, usually immediately after the request has been answered. In rare cases, however, we may store your data for a longer period of time. This may result from legal, official or contractual obligations.

# 4.5 Possibility of removal by the data subject

You can contact us at any time and object to further processing of your data. In this case, we will unfortunately not be able to continue communication with you. All personal data processed by us in the course of establishing contact will be deleted in this case, unless there are legal obligations to retain your data that prevent deletion.

# 5 Contact initiated by Lennertz

# 5.1 Description and scope of data processing

We will contact you if we think you might be interested in our services. We have received your contact data (last name, first name, email address) for this purpose <u>either</u> in the context of a (pre-)contractual relationship from you or from the following sources on the basis of a legitimate interest in accordance with Art. 6 para. 1 sentence 1 lit. f) GDPR:

- Purchase of address data
- Collection from publicly accessible sources, insofar as these result in a presumed interest in our services

Your data will be processed by us exclusively for the purpose of providing information and, if necessary, transmitted to the following categories of recipients:

- Marketing department (internal)
- E-mail dispatch service provider (external)

# 5.2 Legal basis for data processing

Your personal data is processed <u>either</u> on the basis of a (pre-)contractual relationship in accordance with Art. 6 para. 1 sentence 1 lit. b) GDPR or within the scope of our legitimate interest in accordance with Art. 6 para. 1 lit. f) GDPR and exclusively for the purpose of establishing contact.

### 5.3 Duration of data storage

We only store the data for as long as is necessary to fulfill the aforementioned purposes. If no mutual contact is made, your contact details will be deleted. Data that is subject to statutory retention obligations will be deleted after expiry of the same.

# 5.4 Possibility of removal by the data subject

Pursuant to Art. 15-22 GDPR, you have the following rights if the legal requirements are met: Right of access, rectification, erasure, restriction of processing, right to data portability. Pursuant to Art. 21 para. 2 GDPR, you also have the **right to object** to the processing, which gives you the opportunity to object to the data processing in accordance with Art. 6 para. 1 lit. f) GDPR **without having** to provide specific reasons. You can assert this right as follows:

- In writing by e-mail
- In writing by post

# 6 Data Processing within the Scope of HubSpot (CRM) and Vestlane

# 6.1 HubSpot (CRM)

# 6.1.1 Description and Scope of Data Processing

Wir nutzen HubSpot als Customer Relationship Management System zur Verwaltung und Betreuung unserer Sales-Kontakte. Die Datenverarbeitung wird durchgeführt von: HubSpot, Inc., 25 First Street, Cambridge, MA 02141, USA.

Im Rahmen unserer Vertriebsaktivitäten erfassen und speichern wir mit HubSpot die im Kontaktformular angegebenen Daten sowie weitere vertriebsrelevante Informationen (z. B. Kommunikationsverläufe, Notizen zu Gesprächen, Angebots- und Vertragsdaten). Zusätzlich wird erfasst, wann E-Mails geöffnet wurden, um die Kundenkommunikation gezielt und effizient zu gestalten. Die Daten werden auf Servern in den USA gespeichert.

We use HubSpot as a Customer Relationship Management (CRM) system to manage and support our sales contacts. Data processing is carried out by: HubSpot, Inc., 25 First Street, Cambridge, MA 02141, USA. As part of our sales activities, we collect and store the data provided in the contact form as well as other sales-relevant information (e.g., communication histories, notes on conversations, offer and contract data) in HubSpot. Additionally, we record when emails are opened to enable targeted and efficient customer communication. The data is stored on servers in the USA.

# Note on Data Processing in the USA:

It is possible that your data may be processed by our service provider HubSpot in the USA. According to the European Court of Justice (ECJ), the data protection standard in the USA is considered insufficient. There is a risk that US authorities may access your data without effective legal remedies available to you.

HubSpot does not use the data for its own purposes and does not pass it on to third parties. We trust in the reliability as well as the IT and data security of HubSpot. Further information on data protection at HubSpot can be found at:

https://legal.hubspot.com/de/terms-of-service

# 6.1.2 Legal Basis for Data Processing

The processing of personal data stored within the CRM system is based on Art. 6 (1) sentence 1 lit. b) GDPR, insofar as it is required for the initiation or execution of a contract.

The processing of email open data is based on our legitimate interest in efficient and targeted customer communication according to Art. 6 (1) sentence 1 lit. f) GDPR.

### 6.1.3 Purpose of Data Processing

We use HubSpot as a CRM system to systematically manage, document, and optimize our customer relationships in sales. The aim is to enable structured sales work and to provide needs-based support to prospects and existing customers. The analysis of email interactions serves to improve communication quality.

# 6.1.4 Duration of Data Storage

HubSpot stores personal data for as long as it is needed for the respective purposes. Data will be deleted when it is no longer required for contractual or sales purposes, if you object to the processing, or if we delete our HubSpot account. After account deletion, HubSpot permanently removes the data within 30 days.

# 6.1.5 Possibility of Removal by the Data Subject

You can object to the processing of your personal data at any time. Please contact our data protection officer for this purpose.

You can prevent the storage of open data (e.g., time of email opening) by deactivating the automatic loading of images in your email program.

### 6.2 Vestlane

# 6.2.1 Description and Scope of Data Processing

We use Vestlane, a cloud-based platform for the efficient automation of onboarding and management of investors in private equity and venture capital funds, including KYC processes and fund subscriptions. Vestlane, based in Berlin, Germany, operates the platform in accordance with European data protection regulations.

As part of our sales and fund management processes, personal data entered by investors via the contact form or investor onboarding are processed in Vestlane. This includes identity information, communication content, subscription data, and compliance-relevant information. The platform provides real-time updates, document management, investor wallet, and automated compliance checks (<a href="https://vestlane.com/">https://vestlane.com/</a>).

Vestlane uses the data exclusively to provide the contractually agreed services and does not unlawfully pass it on to third parties.

# 6.2.2 Legal Basis for Data Processing

The processing of personal data in the context of investor onboarding is carried out in accordance with Art. 6 (1) sentence 1 lit. b) GDPR, as it is necessary for the fulfillment of contractual or pre-contractual obligations.

The processing of personal data within the scope of KYC legitimization is carried out in accordance with Art. 6 (1) sentence 1 lit. c) GDPR, as it is required to fulfill a legal obligation, in particular under the German Money Laundering Act.

# 6.2.3 Purpose of Data Processing

We use Vestlane to conduct the onboarding of our investors efficiently, securely, and in compliance with regulatory requirements. This includes, in particular, the collection, management, and verification of personal data within the framework of legally required KYC procedures. In addition, Vestlane is used for the automated processing of the fund subscription process, including the digital provision and signing of all necessary documents.

# 6.2.4 Duration of Data Storage

Vestlane stores personal data for as long as it is required for the purposes contractually or procedurally intended. After the purposes have been fulfilled, upon account deletion, or upon request, the data will be deleted, unless statutory retention periods require longer storage.

# 6.2.5 Possibility of Removal by the Data Subject

You have the right at any time to request the deletion or restriction of the processing of your personal data or to object to it, unless there are compelling legitimate grounds to the contrary. For such requests, please contact our data protection officer.

# 7 Data processing in the context of applications

### 7.1 Description and scope of data processing

When you apply for a job with us, we process your personal data. These are stored for further processing for the respective application procedure. The processed data may include

• Name (first name and last name)

- E-mail address
- Phone number
- Salary expectations
- Social media profile
- How you heard about us
- Application documents (CV, cover letter, references, etc.)

# 7.2 Legal basis for data processing

The legal basis for data processing is Art. 88 GDPR and Section 26 BDSG (German Federal Data Protection Act).

# 7.3 Purpose of data processing

We process your data exclusively for the purpose of carrying out the application process.

# 7.4 Duration of data storage

If the application leads to an employment relationship, the personal data will be stored accordingly in compliance with the statutory provisions. If the application is not considered in the selection of a potential candidate, it will be deleted in accordance with the rules of the organization's deletion concept after 6 months at the latest, taking into account the provisions of the German General Equal Treatment Act (AGG), in particular the existing burden of proof under Section 22 AGG.

This does not apply if statutory provisions prevent deletion or if you have given your consent to longer storage. In this case, the further storage of your personal data takes place on the basis of Art. 6 para. 1 sentence 1 lit. c) or lit. a) GDPR.

### 7.5 Possibility of removal by the data subject

You can contact us at any time and object to further processing of your data. All personal data processed by us in the course of the application process will be deleted in this case, unless deletion is prevented by mandatory statutory provisions.

# 7.6 Personio

# 7.6.1 Description and scope of data processing

Our vacancies subpage is operated by the personnel administration and applicant management software Personio. The data processing is carried out by: Personio SE & Co. KG, Seidlstrasse 3 4, 80335 Munich, Germany

The data transmitted as part of your application will be transferred using TLS encryption and stored in a database. We are solely responsible for this data as the controller who carries out this online application process. Personio is merely the operator of the software and this recruiting site and, in this context, a processor pursuant to Art. 28 GDPR. An order processing contract has been concluded with Personio. In addition, Personio GmbH processes further data, some of which may also be personal data, in order to provide its services, in particular for the operation of this recruiting site. The following data is processed by Personio:

- Access logs (server logs)
- Error logs
- Cookies

In addition, when you fill out the application form, we process the following data:

First and last name

- E-mail address
- Telephone number (optional)
- Date of availability
- Information on salary expectations
- Curriculum vitae
- Personal cover letter (optional)
- Social media profile (optional)
- Salary expectations
- Other personal documents

Further information on data protection at Personio can be found here:

https://www.personio.de/datenschutzerklaerung. If you have any questions about data protection at Personio, you can contact Personio at any time at the following e-mail address: <a href="mailto:datenschutz@personio.de">datenschutz@personio.de</a>.

# 7.6.2 Legal basis for data processing

The legal basis for data processing is Art. 88 GDPR and Section 26 BDSG (German Federal Data Protection Act). The legal basis for the use of Personio is our legitimate interest in providing an online application process in accordance with Art. 6 para. 1 sentence 1 lit. f) GDPR.

# 7.6.3 Purpose of data processing

We process your data exclusively for the purpose of carrying out the application process. The purpose of data processing by Personio is to provide an online application process and to optimize the application processes.

# 7.6.4 Duration of data storage

If the application leads to an employment relationship, the personal data will be stored accordingly in compliance with the statutory provisions. If the application is not considered in the selection of a potential candidate, it will be deleted in accordance with the rules of the organization's deletion concept, taking into account the provisions of the German General Equal Treatment Act (AGG), in particular the existing burden of proof under Section 22 AGG.

This does not apply if statutory provisions prevent deletion or if you have given your consent to longer storage. In this case, the further storage of your personal data takes place on the basis of Art. 6 para. 1 sentence 1 lit. c) or lit. a) GDPR.

# 7.6.5 Possibility of removal by the data subject

You can contact us at any time and object to further processing of your data. All personal data processed by us in the course of the application process will be deleted in this case, unless deletion is prevented by mandatory statutory provisions.

# 8 Video conferencing

# 8.0 Description and scope of data processing

We use the video conferencing provider to conduct online meetings, such as job interviews or customer meetings.

For this purpose, your e-mail address, last name and first name will be transmitted to the provider.

The following data is also processed during the interview:

- Communication data in the context of the online meeting
- Metadata (topic, participant IP addresses)

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### • Shared documents, if applicable

Data processing for the European Economic Area and for Switzerland is carried out by: Microsoft Ireland Operations Limited, One Microsoft Pace, South Country Business Park, Leopardstown, Dublin 18, Ireland, a subsidiary of: Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA. We have concluded an order processing contract with Microsoft, which obliges Microsoft to protect the data. Further information on data protection at Microsoft can be found here: <a href="https://privacy.microsoft.com/de-de/privacystatement">https://privacy.microsoft.com/de-de/privacystatement</a>

We also use the services of Zoom to hold online video and telephone conferences with you. Zoom Video Communications is based in the USA, a third country that has not been considered safe from a data protection perspective in the past. However, Zoom Video Communications is certified under the new data protection agreement between the EU and the USA, the EU-US Data Privacy Framework. In addition, we have concluded an order processing contract with Zoom within the meaning of Art. 28 GDPR. Additional information on data protection at Zoom can be found here: <a href="https://zoom.us/privacy.">https://zoom.us/privacy.</a>

# 8.1 Legal basis for data processing

This processing is justified by a legitimate interest pursuant to Art. 6 para. 1 sentence 1 lit. f) GDPR and serves to simplify the scheduling of appointments for both parties.

### 8.2 Purpose of data processing

Data processing is carried out for the purpose of simplifying meetings, in particular the scheduling of appointments, and offering these online.

# 8.3 Duration of data storage

The data will be deleted if the purpose of the data storage has been fulfilled and no contractual, official or legal regulations prevent deletion.

### 8.4 Possibility of removal by the data subject

Please let us know if you would prefer to hold meetings by telephone or on our premises.

# 9 Newsletter for existing clients

# 9.0 Description and scope of data processing

Our newsletter is only available to our existing investors and cannot be subscribed to via our website. The following personal data is processed for the provision of the newsletter:

- First name
- Last name
- E-mail address

The data used originates from existing business relationships between you and us.

The newsletter is sent via e-mail. Personal data will only be passed on to our mailing service provider to the extent necessary for sending the newsletter.

#### 9.1 Legal basis for data processing

We may send newsletters to existing clients who have not given their explicit consent. However, this is done only within the narrow limits of Section 7(3) UWG, which, in light of Art. 95 GDPR, is to be understood as reflecting Art. 6 para 1 sentence 1 lit. f) GDPR. Our legitimate interest is to inform our existing clients about our products by means of advertising e-mails and thus to maintain contact with these clients.

#### 9.2 Purpose of data processing

The newsletter has the function of informing you at regular intervals about offers and news from us.

#### 9.3 **Duration of data storage**

We only process your data for as long as this is necessary to fulfill the purpose and no legal or official retention obligations prevent deletion.

#### 9.4 Possibility of removal by the data subject

You can object to the processing of personal data in connection with the newsletter subscription at any time. To do this, you can click on the unsubscribe link integrated into every newsletter or inform us of your objection in another way.

#### 9.5 Mailing service provider Brevo

#### Description and scope of data processing 9.5.1

The newsletter is sent via "Brevo (formerly Sendinblue)", an online marketing platform. The data processing is carried out by: Brevo, Köpenicker Strasse 126, 10179 Berlin, Germany.

The email addresses of our newsletter recipients, as well as their other data described in this policy, are stored on Brevo's servers in the EU. Brevo uses this information to send and evaluate the newsletter on our behalf. Brevo does not use the data of our newsletter recipients and does not pass it on to third parties. The newsletters contain a web beacon, which is a pixel-sized file that is retrieved from the Brevo server when the newsletter is opened. As part of this retrieval, information such as information about your system, your IP address and the time of retrieval is collected. The statistical surveys also include determining whether the newsletters are opened, how often they are opened and which links are clicked on. For technical reasons, this information can be linked to individual newsletter recipients. However, it is neither our intention nor that of Brevo to monitor individual users. We trust in Brevo's reliability and IT and data security.

#### 9.5.2 Legal basis for data processing

Data processing by Brevo is based on a legitimate interest on our part in the effective and secure transmission of the newsletter to our existing clients, in accordance with Art. 6 para. 1 sentence 1 lit. f) GDPR.

# Purpose of data processing

We use Brevo as our mailing service provider to ensure effective address management and to keep in touch with you via the newsletter.

#### 9.5.4 **Duration of data storage**

According to Brevo, Brevo only stores your personal data for as long as we use your personal data to send you the newsletter. Brevo deletes your data when we delete you from our address file or delete our account with them, after a period of 30 days.

# 9.5.5 Possibility of removal by the data subject

You can object to the processing of your data by Brevo by contacting us. We will then examine your justified objection and inform you whether and why we will continue the data processing. You are also free to use the "opt-out" link at the end of each e-mail at any time, which will result in us deleting your e-mail address from our address file. Consequently, Brevo will also no longer process your personal data. However, this has no influence on address files that Brevo manages on behalf of other clients

# 10 Social media links

We have integrated social media platforms on our services via links, which may result in the social media providers receiving data from you. If you click on the social media link, the website of the respective social media provider will be called up. By accessing the website of the respective social media provider via our services, the respective reference data is transmitted to the respective social media provider. This means that social media provider receives the information that you have visited us.

# Note on data processing in the USA:

If you click on a social media link, your data may be processed by the respective provider in the USA. In the opinion of the ECJ, the data protection standard in the USA is inadequate and there is a risk that your data will be processed by the US authorities for control and monitoring purposes, possibly even without the possibility of legal recourse. If you do not click on the links of the social media providers, no data will be transmitted.

Further information on data processing by social media providers can be found here:

LinkedIn: <a href="https://www.linkedin.com/legal/privacy-policy">https://www.linkedin.com/legal/privacy-policy</a>

Xing: <a href="https://www.xing.com/privacy">https://www.xing.com/privacy</a>

# 11 Tracker and analysis tools

We use the following analysis tools to continuously improve our website. You can find out below which data is processed in each case and how you can contact the respective service provider:

# 11.1 Google Analytics 4

# 11.1.1 Description and scope of data processing

Our website uses Google Analytics 4. This is a service for analyzing access to websites of Google LLC. ("Google") and enables us to improve our website. Data processing for the European Economic Area and for Switzerland is carried out by: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

The information collected may include:

- IP address
- Time of access
- Duration of access
- The website you came from
- Interaction on the website
- Demographic characteristics, if the website visitor is logged into their Google Account
- Device categories, browser type, operating system, screen resolution

and are transmitted to a Google server in the USA and stored there. The evaluation of your activities on our website is transmitted to us in the form of reports. Google may pass on the information collected to third parties if this is required by law or if third parties process this data on behalf of Google. IP anonymization is carried out by Google by default and cannot be deactivated, so IP addresses are only processed in abbreviated form in order to exclude any possible direct personal reference to you.

Please visit <a href="https://policies.google.com/?hl=en&gl=de">https://policies.google.com/?hl=en&gl=de</a>, <a href="mailto:Safeguarding your data">Safeguarding your data</a> – <a href="mailto:Analytics Help">Analytics Help</a> and <a href="mailto:Privacy controls">Privacy controls</a> in Google Analytics - Analytics Help for more information on the terms of use and how data protection is handled by Google Analytics.

#### 11.1.2 Legal basis for data processing

The legal basis for the processing of personal data is your consent in accordance with Art. 6 para. 1 sentence 1 lit. a) GDPR.

#### 11.1.3 Purpose of data processing

The processing of your personal data enables us to analyze your surfing behavior. By analyzing the data obtained, we are able to compile information about the use of the individual components of our website. This helps us to constantly improve our website and its user-friendliness. By anonymizing the IP address, the interest of users in the protection of their personal data is sufficiently taken into account.

#### 11.1.4 **Duration of data storage**

The cookies are deleted no later than 13 months and 5 days after closing the browser after visiting our website. Session statistics data are deleted after 24 hours at the latest. The data will be deleted 14 months after your last visit to our website.

#### 11.1.5 Possibility of removal by the data subject

You have the option to withdraw your previously given consent to data processing at any time. Please contact our data protection officer for this purpose. You can also prevent the installation of cookies by Google Analytics by making the appropriate settings in your browser software. In this case, however, you may not be able to use all the functions of our website to their full extent. Browser extensions, e.g. https://tools.google.com/dlpage/gaoptout?hl=en can also be used to deactivate and control Google Analytics.

#### 11.2 **GRAV CMS**

# Description and scope of data processing

We use the open source content management system (CMS) GRAV on our website. GRAV CMS does not use a database and instead stores content in files. Data processing in GRAV mainly involves loading, managing and rendering content on websites, including text, images and other media. Since GRAV has no built-in database or analytics functions, data processing activities are limited to basic CMS functions, although additional features can be added through plugins or custom extensions.

# 11.2.2 Legal basis for data processing

The legal basis for the use of the application is our legitimate interest in providing a functional website in accordance with Art. 6 para. 1 sentence 1 lit. f) GDPR.

All further processing operations will only take place with consent in accordance with Art. 6 para. 1 lit. a) GDPR.

# 11.2.3 Purpose of data processing

We process your data for the purpose of needs-based and continuous optimization of our website, while respecting data protection and the rights of the data subjects.

# 11.2.4 Duration of data storage

Your personal data will be deleted as soon as it is no longer required for our purposes. This is usually the case 30 minutes after closing the browser. In individual cases, data may be stored for longer if it is used to diagnose or optimize problems on the website.

# 11.2.5 Possibility of removal by the data subject

You have the option to withdraw your previously given consent to data processing at any time. Please contact our data protection officer for this purpose. You can request the deletion of your data from GRAV CMS by sending an email to <a href="mailto:contact@getgrav.org">contact@getgrav.org</a> to request deletion.

# 12 Other tools from third-party providers

We also use third-party providers who help us with the presentation and functionality of the website. These are listed below:

# 12.1 Google Maps

# 12.1.1 Description and scope of data processing

This website uses the product Google Maps from Google LLC. Data processing for the European Economic Area and for Switzerland is carried out by: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

When you access a page, your browser loads the required geo-information into your browser cache in order to display the map correctly. For this purpose, the browser you are using must connect to Google's servers. This enables Google to know that our website has been accessed via your IP address and which map has been displayed. The terms of use of Google Maps can be found at <a href="https://www.google.com/intl/en/help/terms\_maps/">https://www.google.com/intl/en/help/terms\_maps/</a>

# 12.1.2 Legal basis for data processing

The legal basis is your consent pursuant to Art. 6 para. 1 sentence 1 lit. a) GDPR.

# 12.1.3 Purpose of data processing

The use of Google Maps makes it easier for you to find our location and to interact with it in various ways, e.g. through route planning.

### 12.1.4 Duration of data storage

The data will be deleted as soon as it is no longer required for the purpose of data processing, unless legal, official or contractual regulations prevent deletion.

# 12.1.5 Possibility of removal by the data subject

You have the option to withdraw your previously given consent to data processing at any time. To do so, please contact our data protection officer.

If you do not wish to use Google Maps, parts of our website cannot be used.

### 12.2 Google Web Fonts

### Description and scope of data processing

We use web fonts on the website for the uniform display of fonts. Data processing for the European Economic Area and for Switzerland is carried out by: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

When you access a page, your browser loads the required web fonts into your browser cache in order to display texts and fonts correctly. For this purpose, the browser you are using must connect to Google's servers. This gives Google knowledge that our website has been accessed via your IP address. If your browser does not support web fonts, a standard font will be used by your computer.

You can find more information about Google Web Fonts at https://developers.google.com/fonts/faq and in Google's privacy policy: <a href="https://www.google.com/policies/privacy/">https://www.google.com/policies/privacy/</a>.

# 12.2.2 Legal basis for data processing

The legal basis for data processing is your consent in accordance with. Art. 6 para. 1 sentence 1 lit. a) GDPR.

# 12.2.3 Purpose of data processing

The purpose of data processing is the uniform presentation of fonts on this website. Otherwise, we would not be able to present our website to you effectively.

### 12.2.4 Duration of data storage

The data will be deleted as soon as it is no longer required for the purpose of data processing, unless legal, official or contractual regulations prevent deletion.

# 12.2.5 Possibility of removal by the data subject

You can set your browser so that the fonts are not loaded from the Google servers. If your browser does not support Google Fonts or you prevent access to the Google servers, the text will be displayed in the system's default font.

### 12.3 Google Tag Manager

# Description and scope of data processing

Google Tag Manager is a solution with which we can manage website tags via an interface (and thus, for example, integrate Google marketing services into our website). The Tag Manager serves as the "manager" of the implemented tags. This allows us to centrally manage integrated Google products or other analysis tools on our website. The tags embedded on the website are referred to as code snippets, and make it possible to track your activities on our website. By using our website, the Google Tag Manager is downloaded, which automatically results in the user's IP address being forwarded to Google. With regard to the processing of personal data, please refer to the information on the various Google services. Data processing for the European Economic Area and for Switzerland is carried out by: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

You can access the Google Tag Manager Use Policy here: https://www.google.com/intl/de/tagmanager/usepolicy.html

# 12.3.2 Legal basis for data processing

The legal basis for the processing of personal data is your consent in accordance with Art. 6 para. 1 sentence 1 lit. a) GDPR.

### 12.3.3 Purpose of data processing

The Google Tag Manger simplifies the management and organization of the analysis tools used for the website. In order to integrate an analysis tool, JavaScript code must be integrated into the website. By using Google Tag Manger, we are able to manage these integrated pieces of code from one place.

### 12.3.4 Duration of data storage

Since the Google Tag Manager does not store data directly, but forwards the data to the tracking tools, you must check how long the data is stored for the individual integrated tracking tools.

# 12.3.5 Possibility of removal by the data subject

You have the option to withdraw your previously given consent to data processing at any time with effect for the future. To do this, you would need to contact the respective data protection officers of the tools. Further information on the management of your data can be found in the privacy policies of the tools used.

# 12.4 Website optimization service

# 12.4.1 Description and scope of data processing

Like many other sites on the Internet, this website also uses the jQuery Javascript library. We use the CDN from Bootstrap, a toolkit from Twitter. In order to make our website modern, fast and vivid, we use Bootstrap technology by delivering collections of technical instructions (jQuery libraries) to your browser. If you have not yet stored a copy of the jQuery libraries in your browser via another website, the file will be transmitted to you when you access our website and your IP address will be processed through this connection. In this way, the loading speed of our site can be increased and the user experience improved for you. Otherwise, it is no longer necessary to download it again in this case. Further information on data protection can be found in the privacy policy under the following link: <a href="https://getbootstrap.com">https://getbootstrap.com</a>

### 12.4.2 Legal basis for data processing

The legal basis is based on Art. 6 para. 1 sentence 1 lit. f) GDPR. It is our legitimate interest to ensure the effectiveness of the services we use.

# 12.4.3 Duration of data storage

Your data will only be stored for as long as is necessary to fulfill the purpose and no legal obligations to retain your data prevent its deletion.

# 12.4.4 Removal by the data subject

You have the option of objecting to data processing in accordance with Art. 6 para. 1 sentence 1 lit. f) GDPR. If you would like to exercise this option, please contact us.

# 13 Privacy policy for our social media presence

# 13.1 Joint social media controllers

We operate our own presence on the following social media sites:

LinkedIn: <a href="https://de.linkedin.com/company/lennertz-co">https://de.linkedin.com/company/lennertz-co</a>
 XING: <a href="https://www.xing.com/pages/lennertz-co-gmbh">https://www.xing.com/pages/lennertz-co-gmbh</a>

For this, we use the services of

**GROUP** 

- LinkedIn Ireland, Wilton Plaza, Wilton Place, Dublin 2, Ireland and/or LinkedIn Corporation, 1000 W. Maude Ave., Sunnyvale, California 94085, USA ("**LinkedIn**")
- XING SE, Dammtorstrasse 30, 20354 Hamburg, Germany ("XING")

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On the basis of the judgment of the European Court of Justice of June 5, 2018 (available at <a href="http://curia.europa.eu/juris/document.jsf?text=&docid=202543&pageIndex=0&doclang=EN&mode=req&dir=&occ=first&part=1&cid=298398">http://curia.europa.eu/juris/document.jsf?text=&docid=202543&pageIndex=0&doclang=EN&mode=req&dir=&occ=first&part=1&cid=298398</a>), operators of a social media presence and the operators of the social media platforms themselves are considered joint controllers for data processing.

We would like to point out that you use our social media presence and its functions at your own responsibility. This applies in particular to the use of interactive functions (e.g. commenting, sharing, rating). Alternatively, you can also access the information that we make available on social media on our own website.

You can contact the data protection officers of the respective social media via the respective social media.

You can reach the **LinkedIn data protection officer** via the following linked contact form:

https://www.linkedin.com/help/linkedin/ask/TSO-DPO

You can contact the **data protection officer of XING** via the following e-mail address:

<u>Datenschutzbeauftragter@xing.com</u>

# 13.2 Data processed by social media

When you visit our social media presence, the social media operators collect, among other things, your IP address and other information that is stored on your PC in the form of cookies. This information is used to provide us, as the operator of the presence, with statistical information about the use of the site. The data collected about you in this context will be processed by the social media operators and may be transferred to countries outside the European Union. Which information the operator of the respective social network receives and how it is used is described in the privacy policies of the respective social networks. Please also refer to them for contact information.

You can find more information on this under the following links:

LinkedIn: <a href="https://www.linkedin.com/legal/privacy-policy">https://www.linkedin.com/legal/privacy-policy</a>

Xing: <a href="https://www.xing.com/privacy">https://www.xing.com/privacy</a>

https://www.xinq.com/app/share?op=data\_protection

The way in which the social media operators use data from visits to our social media presence for their own purposes, the extent to which activities on the social media presence are linked to individual users, how long the operators store this data and whether data from a visit to the social media presence is passed on to third parties is not conclusively and clearly stated by the social media operators and is not known to us.

When you access our social media presence, the IP address assigned to your device is transmitted to the operator of the respective social network. The social networks also store information about users' end devices (e.g. as part of the "login notification" function); the social media operators may thus be able to link IP addresses to individual users.

If you are currently logged in to the respective social network as a user, a cookie with your individual identifier in this social network is stored on your end device. This allows the operator of the social network to track that you have visited a particular page and how you have used it. This data can be used to tailor content or advertising to your previous website visits.

If you want to avoid this, you should log out of the respective social network or deactivate the "stay logged in" function, delete the cookies on your device and close and restart your browser. In this way, login information that can be used to identify you directly is deleted. This allows you to use our social media presence without revealing your user ID. When you access interactive functions on the page (like, comment, share, messages, etc.), a login screen appears. After logging in, you will again be recognizable as a specific user for the social network used.

Information on how you can manage or delete existing information within the social network can be found on the above-mentioned support pages of the respective social network.

# 13.3 Data processed by us

# 13.3.1 Type and scope of data processing

The data you enter on social networks, in particular your user name and the content published under your account, will be processed by us to the extent that we respond to your messages, if applicable. In addition, your published posts, ratings and comments are linked to your account in the respective social network. If you mention us via an @ or a # or similar, this mention may be published on our site under your user name. The data freely published and disseminated by you on the respective social network may thus be included by us on our online offering and made accessible to other users of the respective social network. If you mark our presence on social media with "Like" or "Follow" or a similar interaction, we will be informed of this by the respective social network with your user name and link to your account.

As the provider of the information service, we do not collect or process any other data from your use of our social media presence:

# 13.3.2 Legal basis of the processing

Data processing on our online presence is based on Art. 6 para. 1 sentence 1 lit. f) GDPR. Our legitimate interest arises from the advertising function of social media. We use these to increase awareness of our company.

# 13.3.3 Purpose of the processing

The data you provide in this context and which may be accessible to us (e.g. user name, images, interests, contact details) will be processed by us exclusively for the purpose of communicating with clients and interested parties. Our legitimate interest lies in offering you a platform on which we can display current information and with the help of which you can address your request to us and we can respond to your request as quickly as possible.

# 13.3.4 Duration of storage

As far as possible, your data will be deleted when we discontinue our presence on social media.

# 14 Data transfer to a third country

To enable us to provide our services, we use the support of service providers from Europe as well as from third countries. In order to ensure the protection of your personal data even in the event of data transfer to a third country, we conclude special order processing contracts with each of the carefully selected service providers. All of the service providers we use have sufficient evidence that they ensure data security through suitable technical and organizational measures. Our service providers from third countries are either located in countries that have an adequate level of data protection recognized by the European Commission (Art. 45 GDPR) or have provided appropriate safeguards (Art. 46 GDPR).

**Adequate level of protection:** The provider comes from a country whose adequate level of data protection has been recognized by the European Commission. Further information can be found at:

### Adequacy decisions (europa.eu)

**EU Standard Contractual Clauses:** Our provider has agreed to the EU Standard Contractual Clauses in order to guarantee secure data transfer. You can find more information on this at:

https://eur-lex.europa.eu/eli/dec\_impl/2021/914/oj?uri=CELEX%3A32021D0914&locale=en\_

**Binding corporate rules:** Art. 47 of the GDPR provides for the possibility of ensuring data protection when transferring data to a third country via binding internal data protection regulations. These are reviewed and approved by the competent supervisory authorities as part of the consistency mechanism in accordance with Art. 63 GDPR.

**Consent:** In addition, data will only be transferred to a third country without an adequate level of protection if you have given us your consent in accordance with Art. 49 para. 1 lit. a) GDPR, or another derogation according to Art. 49 GDPR applies for the data transfer.

# 15 Your rights

You have the following rights vis-à-vis us with regard to your personal data:

### 15.1 Right to withdraw consent (see Art. 7 GDPR)

If you have given your consent to the processing of your data, you can withdraw it at any time. Such a withdrawal affects the permissibility of the processing of your personal data for the future after you have declared it to us. It can be made verbally (by telephone) or in writing by post or e-mail to us.

# 15.2 Right of access (see Art. 15 GDPR)

In the event of a request for information, you must provide sufficient information about your identity and provide proof that the information is yours. The right of access concerns the following information:

- the purposes for which the personal data are processed;
- the categories of personal data that are processed;
- the recipients or categories of recipients to whom the personal data concerning you have been or will be disclosed:
- the envisaged duration of storage of the personal data concerning you or, if specific information on this is not possible, criteria for determining the storage period;
- the existence of a right to rectification or erasure of personal data concerning you, a right to restriction of processing by the controller or a right to object to such processing;
- the right to lodge a complaint with a supervisory authority;
- all available information about the source of the data if the personal data is not collected from the data subject;
- the existence of automated decision-making, including profiling, referred to in Article 22 para. 1 and 4 GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

# 15.3 Right to rectification or erasure (see Art. 16, 17 GDPR)

You have a right to rectification and/or completion vis-à-vis us as the controller if the processed personal data concerning you is incorrect or incomplete. The controller must make the correction immediately.

In addition, you may request the erasure of personal data concerning you if one of the following grounds applies to you:

**GROUP** 

- The personal data concerning you are no longer necessary for the purposes for which they were collected or otherwise processed.
- You withdraw your consent on which the processing is based in accordance with. Art. 6 para. 1 sentence 1 lit. a) or Art. 9 para. 2 lit. a) GDPR and there is no other legal basis for the processing.
- You object to the processing pursuant to Art. 21 para. 1 GDPR and there are no overriding legitimate grounds for the processing, or you object to the processing pursuant to Art. 21 para. 2 GDPR.
- The personal data concerning you has been processed unlawfully.
- The deletion of personal data concerning you is necessary to fulfill a legal obligation under Union law or the law of the Member States to which the controller is subject.
- The personal data concerning you was collected in relation to information society services offered in accordance with Art. 8 para. 1 GDPR.

If we have made the personal data concerning you public and we are obliged to erase your personal data pursuant to Art. 17 para. 1 GDPR, we will take all reasonable steps to inform other data controllers that you have requested the erasure of all links to this personal data or copies or replications of this personal data.

The right to erasure **does not apply** if the processing is necessary:

- to exercise the right to freedom of expression and information;
- for compliance with a legal obligation which requires processing by Union or Member State law to which the
  controller is subject or for the performance of a task carried out in the public interest or in the exercise of
  official authority vested in the controller;
- for reasons of public interest in the area of public health pursuant to Art. 9 para. 2 lit. h and i and Art. 9 para. 3 GDPR:
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes
  in accordance with Article 89 para. 1 GDPR in so far as the right referred to in the above is likely to render
  impossible or seriously impair the achievement of the objectives of that processing; or
- for the establishment, exercise or defense of legal claims.

# 15.4 Right to restriction of processing (see Art. 18 GDPR)

Under the following conditions, you may request that we restrict the processing of your personal data:

- if you contest the accuracy of the personal data concerning you, for a period enabling us to verify the accuracy of your personal data;
- the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- we no longer need the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims, or
- if you have objected to the processing pursuant to Art. 21 para. 1 GDPR pending the verification whether our legitimate grounds override yours.

If the processing of your personal data has been restricted, this data – apart from its storage – may only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

If the restriction of processing has been restricted in accordance with the above conditions, you will be informed by us before the restriction is lifted.

# 15.5 Notification obligation (see Art. 19 GDPR)

If you have asserted your right to rectification, erasure or restriction of data processing against us, we are obliged to notify all recipients of your personal data of the rectification, erasure or restriction of data processing. This only applies insofar as this notification does not prove impossible or would involve disproportionate effort.

You have the right to be informed of which recipients have received your data.

# 15.6 Right to data portability (see Art. 20 GDPR)

You have the right to receive your personal data from us in a commonly used, machine-readable format in order to have it transmitted to another controller where applicable, provided that

- the processing is based on consent pursuant to Art. 6 para. 1 sentence 1 lit. a) GDPR or Art. 9 para. 2 lit. a) GDPR or on a contract pursuant to Art. 6 para. 1 sentence 1 lit. b) GDPR and
- the processing is carried out using automated procedures.

In exercising your right to data portability, you have the right to have the personal data transmitted directly from us to another controller where technically feasible.

The right to data portability does not apply to the processing of personal data necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.

# 15.7 Right to object to the processing (see Art. 21 GDPR)

Insofar as we base the processing of your personal data on a legitimate interest (acc. to Art. 6 para. 1 sentence 1 lit. f) GDPR) on our part, you can object to the processing. The same applies if we base the data processing on Art. 6 para. 1 sentence 1 lit. e) GDPR.

When exercising such an objection, we ask you to explain the reasons why we should not process your personal data as we have done. In the event of your justified objection, we will examine the situation and either discontinue or adapt the data processing or point out to you our compelling legitimate grounds, on the basis of which we will continue the processing.

# 15.8 Right to lodge a complaint with the competent supervisory authority (see Art. 77 GDPR)

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 on the GDPR.

The supervisory authority with which the complaint has been lodged will inform you of the progress and outcome of the complaint, including the possibility of a judicial remedy pursuant to Art. 78 GDPR.

# 16 How to exercise these rights

To exercise these rights, please contact our data protection officer:

Anna Tiede from WS Datenschutz GmbH lennertz@ws-datenschutz.de

or by post:

WS Datenschutz GmbH Dircksenstrasse 51 10178 Berlin, Germany



# 17 Subject to change

We reserve the right to amend this privacy policy in compliance with the statutory provisions.

Last updated: September 2025