Data Protection Statement of the CEVEYGROUP

We take the protection of your personal data very seriously!

The statement below will give you an overview about what we do to ensure your data is protected and what types of data are collected for what purposes.

Your consent, or permission provided by law, form the fundamental aspects governing the storage and use of your data. This will depend on what we actually do with your data.

Just a note in advance: To make this document easier to read, we will not include both the masculine and feminine forms of speech – all references to persons will apply equally to both genders.

First of all, you will find a few items of general information on the subject of data protection. Detailed arrangements for users of various services can be found in chapters I to V. below for the following areas:

I. For all users of this website
II. For requests made to our companies
III. For users of our testing systems via the CSYSGATE platform
IV. For applicants
V. For business contacts and seminar participants

General information:

"GDPR" is used here as an abbreviation for the EU General Data Protection Regulation. In accordance with Article 13 (and/or Article 14) of the GDPR, the information below serves to fulfill the information obligations in areas in which CEVEYCONSULTING GmbH, CEVEYSYSTEMS GmbH and SMARTinSALES GmbH as responsible entities, collect, process or make use of personal data.

Entities responsible for data protection:

CEVEYCONSULTING GmbH – CEVEYSYSTEMS GmbH – SMARTinSALES GmbH

Managing Directors of CEVEYCONSULTING GmbH:
Dr. Bernhard Cevey-Trendelenburg, Dr. Tobias Heisig, Dr. Alexander Wittwer

Managing Director of CEVEYSYSTEMS GmbH:
Dr. Bernhard Cevey-Trendelenburg

Managing Director of SMARTinSALES GmbH:
Dr. Bernhard Cevey-Trendelenburg

Address of the responsible entities:

CEVEYCONSULTING GmbH / CEVEYSYSTEMS GmbH
Pfalzhaldenweg 6
72070 Tübingen

SMARTinSALES GmbH
Steiner Str. 15C
81369 Munich
Contact details of Data Protection Officer:
datenschutz(at)ceveygroup.com

Rights of the data subject:

In order to ensure that all matters are handled fairly and transparently, we wish to point out that the rights of the data subject include the following:

- The right to information
- The right to rectification or to erasure or the right to restriction of processing
- The right to withdraw consent
- The right to data portability

The legal basis for this can be found in Articles 15 to 22 of the GDPR.

In order to exercise any of these rights, please send a message to: datenschutz(at)ceveygroup.com.

In addition, there exists a right to lodge a complaint with a supervisory authority.

Supervisory authority:

The competent supervisory body for CEVEYCONSULTING GmbH, CEVEYSYSTEMS GmbH and SMARTinSALES GmbH in the sense of Article 4(21) of the GDPR and Section 40 German Federal Data Protection Act (new) is:
Regional Representative for Data Protection and the Freedom of Information
Dr. Stefan Brink
Königstrasse 10 a
70173 Stuttgart
Telephone: +49 (0)711/61 55 41 - 0
E-mail: poststelle@lfdi.bw.de

Other information:

- Automated decision-making including profiling does not exist at the present time.
- In the event that CEVEYCONSULTING GmbH, CEVEYSYSTEMS GmbH or SMARTinSALES GmbH intends to process personal data for any other purpose than the one for which the personal data were collected, it will make information regarding that other purpose and all other material information available to the data subject, before the data undergoes further processing for the other purpose. In so far as the other purpose is compatible with the purposes to which consent had been given, or in the event that the justifiable interests of the CEVEYGROUP should prevail, providing separate information will not be necessary.

Your trust is important to us. That is why we are always ready to discuss and explain to you how we process your personal data. If you have any questions and the answers cannot be found in this Data Protection Statement, or if you would like to receive more detailed information regarding any specific point, please contact us at any time by sending an e-mail to our Data Protection Officer at datenschutz(at)ceveygroup.com.
I. For all users of our website

For organisational and technical reasons, the following information is stored whenever you make use of our internet sites: the names of the pages viewed, the browser that was used, the operating system of the device used, the date and time of access, the names of any files downloaded and your IP-address in abbreviated form. The analysis of this information is solely used as a means of optimising our internet presence and cannot be traced back to any individual person.

Use of cookies
We make use of cookies as a means of making our website more user-friendly. Cookies are small text files that are stored on your end-user device. They make it easier for you to navigate your way around the website conveniently and without any delays. To achieve this, the only data used is anonymous – we have no way of identifying you as a person from the data that is used. Cookies do not cause any damage to your computer, nor do they contain any viruses. Most of the cookies we use are what are known as “session cookies”. They are automatically deleted at the end of your visit. Other cookies are left behind on your device and make it possible for us to recognise your browser when you visit our site again (persistent cookies).
You can set your browser in such a way that it informs you whenever cookies are placed and you are able to decide in each case whether you wish to accept cookies in certain cases or to reject cookies altogether. You can also block or delete individual cookies. For technical reasons, this may however mean that certain functions of our internet presence may be restricted and may not function to their full capabilities.

II. For requests made to our companies

Do you have a specific request? You can find our contact details on the website by selecting “Contact”. We look forward to receiving your request by e-mail, by post or by telephone. You can decide of your own free will which data you wish to pass on to us.
We will use your data in order to provide you with the service you requested, or, if you have demonstrated any interest or have submitted query, in order to send you tailor-made information on the topics of interest to you.
### III. For users of our testing systems via the CSYSGATE platform

**Purpose underlying the collection, processing or use of data**
To answer questions regarding the relevant potential evaluation by the user, to draw up the appraisal of results and to evaluate and discuss the results with the user.

**Legal basis for the processing of data (Article 6 of the GDPR)**
The data subject must voluntarily agree to the use of his/her data. This can be achieved by means of a corresponding declaration of intent. This Data Protection Statement is stored on the CSYSGATE portal.
The CEVEYGROUP will fundamentally adhere to the precepts of data avoidance and data minimisation with regard to the intended purposes for which data is processed, so as to take account of the interests of the parties concerned that are worthy of protection.

**Description of the groups of persons affected and of the relevant data or categories of data**
Group of persons involved: Persons submitting applications to CEVEYCONSULTING GmbH, CEVEYSYSTEMS GmbH or SMARTinSALES GmbH, clients’ employees and cooperation partners making use of test systems.
The customary and essential details of contacts (surname, forename, company affiliation, e-mail address).

**Recipients or categories of recipients to whom data can be divulged**
All employees (including employees of affiliated companies, if applicable) who are tasked with fulfilling tasks of a specific purpose inside the company.
In so far as we disclose data to other individuals or entities (contract processors or third parties) during processing, transfer data to them or grant them access to the data in any other manner, we will do this only if there exists a legal basis to do so (e.g. if it is necessary, in fulfilment of contractual requirements, to transfer data to third parties, such as a supplier of payment services, in accordance with Article 6(1)(b) of the GDPR), if you have given consent, if we are legally obliged to do so or in order to uphold our justified interests (e.g. when deploying vicarious agents, web hosting providers, etc.). In so far as we instruct third parties to process data on the basis of a “contract processing agreement”, we will do so in accordance with Article 28 of the GDPR.
Further information can be obtained upon request by sending a message to datenschutz(at)ceveygroup.com.

**Transfer of data to third countries**
Subject to the terms set out by law or under a contract, we will only process data or arrange for it to be processed in third countries if the special requirements laid down under Article 44 et seq. of the GDPR have been fulfilled. Amongst other things, this means that processing will take place on the basis of special guarantees, such as the official adoption of a level of data protection corresponding to the one that applies in the EU (such as the “Privacy Shield” in the case of the USA) or compliance with officially recognised contractual obligations (standard contractual clauses).

**Duration of storage and/or regulatory deadlines for the deletion of data**
The legislator has imposed a variety of requirements and deadlines governing data retention. Once those deadlines have expired, the relevant data must be routinely deleted if no longer required to fulfil the terms of an agreement. The law there requires that commercial or financial data relating to concluded financial years must be deleted once ten more years have elapsed, assuming that there are no further stipulations that these be retained for a longer period or that the retention thereof is not required for any justifiable reasons. Shorter deadlines for deletion are used in specific areas (e.g. in personnel administration, such as in relation to rejected applications or warnings issued to employees). As long as the data do not relate to any such areas, they will be deleted once the purposes for which they were saved no longer apply.
IV. For applicants

**Purpose underlying the collection, processing or use of data**
To carry out a job application process and to reach a decision whether a contract of employment should be concluded.

**Legal basis for the processing of data (Article 6 of the GDPR)**
Article 6(1)(b) of the GDPR: In order to take steps at the request of the data subject prior to entering into a contract.

The data subject submits his/her application voluntarily.

The CEVEYGROUP will fundamentally adhere to the precepts of data avoidance and data minimisation with regard to the intended purposes for which data is processed, so as to take account of the interests of the parties concerned that are worthy of protection.

**Description of the groups of persons affected and of the relevant data or categories of data**
Group of persons involved: Persons submitting applications to CEVEYCONSULTING GmbH, CEVEYSYSTEMS GmbH or SMARTinSALES GmbH

The customary and essential details relating to applicants, which form part of a job application process.

**Recipients or categories of recipients to whom data can be divulged**
The Personnel department, the line managers of the post for which you have applied and company management. No data will be transferred to third parties, with the exception of our service providers carrying out data processing on a contractual basis.

**Transfer of data to third countries**
There is no intention to transfer personal data to any third country or to any international organisation. Subject to the terms set out by law or under a contract, we will only process data or arrange for it to be processed in third countries if the special requirements laid down under Article 44 et seq. of the GDPR have been fulfilled. Amongst other things, this means that processing will take place on the basis of special guarantees, such as the official adoption of a level of data protection corresponding to the one that applies in the EU (such as the “Privacy Shield” in the case of the USA) or compliance with officially recognised contractual obligations (standard contractual clauses).

**Duration of storage and/or regulatory deadlines for the deletion of data**
The data will be deleted six months after the application process has been completed. If an employment contract is concluded, we will inform you by separate means as to the way in which your data will be used in connection with your status as an employee.
V. For business contacts and seminar participants

Purpose underlying the collection, processing or use of data
Maintaining contacts. So that we are able to contact you for business purposes.
In the case of seminar participants: In order to document your participation in our events on behalf of our clients, in order to send you the minutes of the event you attended and in order to draw up certificates of participation.

Legal basis for the processing of data (Article 6 of the GDPR)
Depending on the stage that our connection, as contacts, has reached, a variety of legal bases is conceivable:
- In order (and additionally) to take steps at the request of the data subject prior to entering into a contract.
- The data subject voluntarily gives consent to this. This can be achieved by means of a corresponding declaration of intent.
- Processing is required in order to fulfil contractually engaged obligations (such as for services provided by the CEVEYGROUP).
- In certain cases, processing may also be required in order to uphold the justified interests of the CEVEYGROUP.

The CEVEYGROUP will fundamentally adhere to the precepts of data avoidance and data minimisation with regard to the intended purposes for which data is processed, so as to take account of the interests of the parties concerned that are worthy of protection.

Description of the groups of persons affected and of the relevant data or categories of data
Group of persons involved: Business contacts of CEVEYCONSULTING GmbH, CEVEYSYSTEMS GmbH or SMARTinSALES GmbH; contact persons representing clients, service providers or partners; seminar participants
The customary and essential details of contacts (surname, forename, mode of address, company affiliation and/or department, telephone number, e-mail address). It is possible that for evidential or information purposes, such as for meetings, transactional data may have been linked to these contacts, such as entries in a history, for example.

Recipients or categories of recipients to whom data can be divulged
All employees (including employees of affiliated companies, if applicable) who are tasked with fulfilling tasks of a specific purpose inside the company.
In so far as we disclose data to other individuals or entities (contract processors or third parties) during processing, transfer data to them or grant them access to the data in any other manner, we will do this only if there exists a legal basis to do so (e.g. if it is necessary, in fulfilment of contractual requirements, to transfer data to third parties, such as a supplier of payment services, in accordance with Article 6(1)(b) of the GDPR), if you have given consent, if we are legally obliged to do so or in order to uphold our justified interests (e.g. when deploying vicarious agents, web hosting providers, etc.). In so far as we instruct third parties to process data on the basis of a "contract processing agreement", we will do so in accordance with Article 28 of the GDPR.
Further information can be obtained upon request by sending a message to datenschutz(at)ceveygroup.com.

Transfer of data to third countries
Subject to the terms set out by law or under a contract, we will only process data or arrange for it to be processed in third countries if the special requirements laid down under Article 44 et seq. of the GDPR have been fulfilled. Amongst other things, this means that processing will take place on the basis of special guarantees, such as the official adoption of a level of data protection corresponding to the one that applies in the EU (such as the “Privacy Shield” in the case of the USA) or compliance with officially recognised contractual obligations (standard contractual clauses).

Duration of storage and/or regulatory deadlines for the deletion of data
The legislator has imposed a variety of requirements and deadlines governing data retention. Once those deadlines have expired, the relevant data must be routinely deleted if no longer required to fulfil the terms of an agreement. The law there requires that commercial or financial data relating to concluded financial years must be deleted once ten more years have elapsed, assuming that there are
no further stipulations that these be retained for a longer period or that the retention thereof is not required for any justifiable reasons. As long as the data do not relate to any such areas, they will be deleted once the purposes for which they were saved no longer apply. Contacts of persons, about whom it has become known that they have left their company, can be rendered inactive and will therefore no longer appear during ordinary searches.