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Information about data protection on our websites

This statement is compulsory in accordance with the General Data Protection Regulation (GDPR).

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1 Preliminary note

The following sections provide you with information concerning all aspects of our dealings with your personal data. The legislator has stipulated which information is necessary. If you would like to know more, please see the DSGVO Art. 12-22 and 34. The complete text of the DSGVO is available online at: www.datenschutz-grundverordnung.eu.

If you have any questions about the DSGVO, please contact our data protection officer and/or administration.

2 What are personal data?

All information pertaining to a defined or definable person. Persons are definable if they can be directly or indirectly identified. This can, for example, be the result of tracking an identifier such as a name, an identification number, location data, an online identifier or one or more specific characteristics.

3 Basic information

3.1 Who is responsible for processing my data?

Responsibility for data processing is held by:

steute Technologies GmbH & Co. KG
Brückenstr. 91
32584 Löhne

3.2 How can I contact you?

Contact partner:

Susanne Ruge
Email: datenschutz@steute.com

3.3 Which regulatory body is responsible for controlling and enforcing data protection?

Responsible for the management of, and compliance with data privacy laws:

Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen
Postfach 20 04 44
40102 Düsseldorf
Email: poststelle@ldi.nrw.de
Tel.: +49 211 38424-0
Fax: +49 211 38424-999

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3.4 How can I contact the data protection officer at your company?

The data protection officer for steute is the SK-Consulting Group GmbH, Mr. Lüllemann.

Contact as follows:

cyonect GmbH
Herr Karl-Uwe Lüllemann
Osterweg 2
D – 32549 Bad Oeynhausen
Email: datenschutz@cyonect.de
Tel.: +49 5731 4906430

4 Additional important information

4.1 Why does your company process my data?

Data are collected and processed in order to deal with your ongoing concerns, as well as to improve the user-friendliness of our website.

4.2 Why is your company permitted to process my data?

Current data protection legislation (= EU General Data Protection Regulation) permits the processing of your data (= personal data) if we have a legitimate interest (see 4.1) and can assume that you have no serious objections (Legitimate interest, Art. 6 Par. 1 it. f DSGVO). This occurs in accordance with § 25 par. 2 no. 2 TDDDG (German Telecommunications Digital Services Data Protection Act), particularly in conjunction with essential cookies.

If, for example, you use our *webshop* or request an *individual consultation*, the DSGVO permits us to process your data for the purposes of initiating and closing a contract with you in accordance with Art. 6 Par. 1 lit. b DSGVO.

If you have given us your consent, for example in order to receive our *newsletter* or *white papers* or regarding *cookies* etc., if applicable for the transfer of data to our subsidiary, the General Data Protection Regulation permits us to process your data in accordance with Art. 6 Par. 1 lit. a DSGVO. You can withdraw your consent at any time and with future effect.

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4.3 Which data of mine are collected?

When you visit our website, the following data will be collected automatically:

- IP address in an anonymised form
- referrer (previously visited website)
- requested internet page or file
- browser type and browser version
- operating system used
- device type used
- time and date of access

When you use forms or third-party services on our website, additional data you provide us with will be collected and processed. Please go to Section 5 “Detailed information about data processing” and Section 6 “Third parties” for further details.

4.4 In which statistics are my data used?

Provided you have not objected, the following anonymised statistics will be compiled:

- visitor numbers: visitors, sessions, pages called up, search engine robots;
- visitor behaviour: duration of sessions, pages called up per session, drop-off rate;
- page analysis: entry pages, exit pages, error pages, most-visited pages, pages with a high drop-off rate, search terms;
- original pages: all original pages, referring pages;
- visitor locations;
- browsers and systems: browsers, browser versions, operating systems, operating system versions.

4.5 Who can my data be passed on to?

Within the framework of data processing, your anonymised data can be viewed by our contractually bound website provider. Anonymised means that the data cannot be matched to you. They can also be passed on to third-party service providers who help us to optimise our website and who receive your data in accordance with your declaration of consent.

During the processing of contact form queries, your data could be passed on to:

- persons within our company who are directly involved in data processing
- service providers who are contractually bound to secrecy and who assume some data processing tasks for us
- external companies, where absolutely necessary. Examples include post office workers delivering letters, our own subsidiaries and our own sales partners.

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4.6 Will my data be passed on to countries outside the EU?

Transfer of your data to other countries is fundamentally excluded unless this is required in order to fulfil the task in question.

4.7 How long will you store my data?

Your IP address is anonymised by our internet provider from the first day. Data which you have provided us with will be stored for the period of time required in order to process your request. However, some legislation compels us to keep certain data (e.g. for 6 or 10 years in accordance with the German Tax Code § 147). At the end of this period, all data no longer required will be deleted.

4.8 Essential Cookies

Essential cookies are required for basic functions of the website and shop. This ensures that the website functions properly.

Name	fe_typo_user
Provider	steute Technologies GmbH & Co. KG
Lifetime	Session
Purpose	This cookie is required for the session handling.

Name	om_frontend
Provider	steute Technologies GmbH & Co. KG
Lifetime	Session
Purpose	This cookie is required for the session handling.

Name	PHPSESSID
Provider	steute Technologies GmbH & Co. KG
Lifetime	Session
Purpose	This cookie is required for the session handling.

Name	sap-contextid
Provider	steute Technologies GmbH & Co. KG
Lifetime	15 Minutes
Purpose	This cookie is required for the session handling.

Name	citrix_ns_id
Provider	steute Technologies GmbH & Co. KG
Lifetime	15 Minutes
Purpose	This cookie is required for the session handling.

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5 Detailed information about data processing

Various forms are provided on our website. Compulsory fields for the task at hand are always marked on the corresponding form. Completion of other fields is voluntary and not required in order to process you request. However, this information can be helpful.

5.1 Newsletter

For registrations to our Newsletter, we use the so-called double-opt-in procedure. This means that once you have sent us your email address, we will send you a confirmation email in which we in turn ask you to confirm that you wish to receive our Newsletter. If you do not confirm within 24 hours, your registration will automatically be deleted.

Once you have confirmed your wish to receive our Newsletter, we will store your email address until you decide to cancel the Newsletter. Storage serves the sole purpose of being able to send you the Newsletter. In addition, during the registration and confirmation processes we will store your IP address and the date/time to exclude fraudulent use of your personal data.

If you are located in France or Italy or Brazil, we will pass on your data to our corresponding subsidiary to enable you to receive the separate newsletters from that subsidiary (with its own topics, in its own language…). They are:

- **France**
  steute France SARL, Inovallee 31C, Chemin du vieux chêne, F - 38240 Meylan
- **Italy**
  steute Italia srl, Via Curtatone, 1, I - 20019 Settimo Milanese (MI)
- **Brazil**
  steute do Brasil, Avenida Avelino Capellato, 270, Santa Claudina, BR - 13284-480 Vinhedo - SP

You can withdraw your consent at any time by sending an email to news@steute.com or by writing to the contact address stated in our Imprint. Following withdrawal of your consent, all your data will be deleted.

5.2 Contact form

Should you have any questions regarding our products and services, please send us a message via our contact form. We will be happy to hear from you and will then contact you in person. Please note that this contact form is only for communicating a simple request. For all other issues, please contact us by email, telephone or post.

All processing of your data will be performed exclusively on the basis of Art. 6 Par. 1 lit. b GDPR (pre-contractual measures / entering into a contract).

Your data will continue to be stored until the purpose of the storage ceases to exist. Statutory legal requirements – in particular retention periods– remain unaffected.

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5.3 Appointment requests

If you contact us with an appointment request, your details will be stored for the processing of your request and for any follow-up enquiries.

All processing of your data will be performed exclusively on the basis of Art. 6 Par. 1 lit. b GDPR (pre-contractual measures / entering into a contract).

Your data will continue to be stored until the purpose of the storage ceases to exist. Statutory legal requirements – in particular retention periods– remain unaffected.

5.4 Sample orders

If you order a product sample, your details will be stored for the processing of your sample order and for any follow-up enquiries. We will not pass on any data without your consent.

All processing of your data will be performed exclusively on the basis of Art. 6 Par. 1 lit. b GDPR (pre-contractual measures / entering into a contract).

Your data will continue to be stored until the purpose of the storage ceases to exist. Statutory legal requirements – in particular retention periods– remain unaffected.

5.5 White papers

When you request a white paper, the details you provide on the form will be stored for the purpose of sending you the white paper and in case you have any follow-up questions.

All processing of your data will be performed exclusively on the basis of Art. 6 Par. 1 lit. b GDPR (pre-contractual measures / entering into a contract).

Your data will continue to be stored until the purpose of the storage ceases to exist. Statutory legal requirements – in particular retention periods– remain unaffected.

5.6 Protected downloads

Some of the documents available on our websites are protected from direct downloading by a form requiring completion. The data entered on this form will be used to verify the business relationship and to make contact (by email or telephone), should the need arise.

All processing of your data will be performed exclusively on the basis of Art. 6 Par. 1 lit. b GDPR (pre-contractual measures / entering into a contract).

Your data will continue to be stored until the purpose of the storage ceases to exist. Statutory legal requirements – in particular retention periods– remain unaffected.

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6 Third parties

On the basis of our legitimate interests (i.e. interest in the analysis, optimisation and economic efficiency of our online presentation in line with Art. 6 Par. 1 lit. f DSGVO) or on the basis of your given consent in line with Art. 6 Par. 1 lit. a DSGVO, our website includes contents from third-party service providers, e.g. *video streaming* or *website analysis* (hereafter “contents”). The provision of such contents always requires the IP address of the user to be passed on to the third-party provider because the contents could not be sent to the user's browser otherwise. Contents can only be presented on the screen when the IP address is known.

6.1 Alugha Video-Player

This website uses the Alugha video player, an embedded function from the provider Alugha GmbH, O7, 17, 68161 Mannheim, Germany, for presenting and playing videos (further information at https://alugha.com).

In conjunction with this video player, video performance data are captured for diagnosing errors and creating performance reports for website operators. Here Alugha has implemented data protection measures which guarantee the highest degree of data privacy and anonymisation. They include the absence of tracking cookies and fingerprinting, the standardised anonymisation of user IPs, as well as storage of the data exclusively on Alugha servers within the European Union. The data captured by Alugha during video use are made available to us as the website operator. At no point in time is it possible to assign specific collected information to individual users/viewers. Alugha does not sell or forward these data to third parties. Data are evaluated on the basis of a legitimate interest in accordance with Art. 6 Par. 1 lit. f GDPR, which includes the due and proper provision of our services by Alugha. Please click on the following links for data protection information about Alugha, including their terms and conditions, as well as their data privacy statement:

Terms and conditions: https://alugha.com/tos
Data privacy statement: https://alugha.com/privacy

Personal data are only processed in compliance with the current legal regulations for data protection. Users can assert their data privacy rights in accordance with the legal regulations at any time.

6.2 etracker Analytics

The provider of this website uses the services of etracker GmbH, Hamburg, Germany (www.etracker.com) to analyse usage data. We do not use cookies for web analysis by default. If we use analysis and optimisation cookies, we will obtain your explicit consent separately in advance. If this is the case and you agree, cookies are used to enable a statistical range analysis of this website, a measurement of the success of our online marketing measures and test procedures, e.g. to test and optimise different versions of our online offer or its components. Cookies are small text files that are stored by the Internet browser on the user's device. etracker cookies do not contain any information that could identify a user.

The data generated by etracker on behalf of the provider of this website is processed and stored by etracker solely in Germany by commission of the provider of this website and is thus subject to the strict German and European data protection laws and standards. In this regard, etracker was independently checked, certified and awarded with the ePrivacyseal (https://www.eprivacy.eu/en/customers/awarded-seals/company/etracker-gmbh/) data protection seal of approval.

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The data processing is based on Art. 6 Section 1 lit f (legitimate interest) of the General Data Protection Regulation (GDPR). Our legitimate interest is the optimisation of our online offer and our website. As the privacy of our visitors is very important to us, the data that may possibly allow a reference to an individual person, such as IP address, registration, or device IDs, will be anonymised or pseudonymised as soon as possible. etracker does not use the data for any other purpose, combine it with other data or pass it on to third parties.

You can object to the outlined data processing at any time by clicking on the slider on https://www.steute.com/en/data-privacy. The objection has no disadvantageous consequences. If no slider is displayed, the data collection is al-ready prevented by other blocking means.

Further information on data protection with etracker can be found at https://www.etracker.com/en/data-privacy/.

6.3 Google Ads and Conversion Tracking

This website uses Google Ads. Google Ads is an online advertising software from Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland (“Google”).

Within the framework of Google Ads, we use so-called conversion tracking. When you click on a Google ad placed by us, you will be redirected to one of our websites. Our system will be informed that a click occurred, but the information will be anonymised for statistical purposes and then further processed to optimise our ads in the future.

For more information about Google Ads go to the Google data privacy statement at: https://www.google.de/policies/privacy/.

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6.4 Microsoft Ads / Bing Ads

Within the framework of our marketing activities, we use Microsoft Advertising from Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA. This service helps us to draw the attention of companies to the high quality of our products. If you reach our website via a Microsoft Bing ad, a cookie will be stored on your computer by Microsoft Bing Ads. This informs Microsoft Bing and us about the fact that somebody has clicked on an advertisement, has been forwarded to our website and has accessed a pre-determined target page (conversion page). We only know the total number of users who have clicked on a Bing ad and have then been forwarded to our conversion page. We do not know any personal information about the identity of these users.

Microsoft and processing

You can find further information about data privacy and the cookies used by Microsoft and Bing Ads (Microsoft Advertising) by visiting the Microsoft website: https://privacy.microsoft.com/de-de/privacystatement and https://about.ads.microsoft.com/de-de/policies/legal-privacy-and-security#privacy-and-data-protection-policies

If you are not in agreement with Microsoft being able to process information about your surfing behaviour as laid out above, you can object to the setting of cookies for this purpose – for example using the browser setting which fundamentally deactivates the setting of cookies. Moreover, you can prevent the capturing of data generated by the cookie and relating to your use of the website, as well as processing of these data by Microsoft, by withdrawing your consent. To do this, click on the following link: https://account.microsoft.com/privacy/ad-settings/signedout

What is the legal basis for processing?

If you have consented to use of Microsoft Bing Ads (otherwise known as Microsoft Advertising), then this consent constitutes the legal basis (Art. 6 Par. 1 lit. a GDPR) for processing of your personal data.

How long will we store your data?

Once their purpose has been served, we will delete all data received from you via Microsoft unless we are legally obliged to retain the data for longer, or still require the data for the execution or completion of an existing contractual agreement, or still require the data as evidence. In such cases we delete the corresponding data once the legal retention period has expired or as soon as we no longer require the data for the execution or completion of an existing contractual agreement, or as evidence.

We have no information about the Microsoft policy for deleting personal data.

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6.5 Lead Gen Forms bei LinkedIn

We use Lead Gen Forms from LinkedIn for the purposes of customer acquisition. These forms are a type of advertising used in social media networks which enable contact forms to be integrated in sponsored content.

Using this service within the framework of customer acquisition means that interested parties have a quick and easy way of forwarding their email address and other user information to us. Specifically: first name, surname, email address, professional title and company name.

This functionality enables us to target interested parties more accurately.

LinkedIn and processing

If you are a member of LinkedIn, this platform can match call-up of the abovementioned data to your registered user profile. Please click on the following link for further information from LinkedIn about data privacy and Lead Gen Ads: https://www.linkedin.com/legal/privacy-policy and/or https://business.linkedin.com/de-de/marketing-solutions/native-advertising/lead-gen-ads

You can optionally disable this function for the future by setting an opt-out cookie: https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out.

What is the legal basis for processing?

The legal basis for using the Lead Ads Tool is Art. 6 Par. 1 lit. f GDPR. Our legitimate interest for using this tool is the conducting of marketing activities aimed at initiating new business.

How long will we store your data?

Once their purpose has been served, we will delete all data transferred via Lead Gen Forms unless we are legally obliged to retain the data for longer, or still require the data for the execution or completion of an existing contractual agreement, or still require the data as evidence. In such cases we delete the corresponding data once the legal retention period has expired or as soon as we no longer require the data for the execution or completion of an existing contractual agreement, or as evidence.

We have no information about the LinkedIn policy for deleting personal data.

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6.6 ZoomInfo WebSights

In conjunction with our acquisition of new customers, we use Zoominfo Websights, a service from Zoominfo Technologies LLC, 805 Broadway Street, Suite 900, Vancouver, WA 98660, USA. By integrating a code snippet on our website, this service enables us to collect information about your interactions with our site. This only occurs once you have expressly given us your consent.

Processing by Zoominfo Websights

Zoominfo Websights collects and processes data in order to provide us with an insight into visitor behaviour on our website, which in turn helps us to adapt our marketing strategies accordingly. For further information about data privacy at Zoominfo Websights, please click here:
https://www.zoominfo.com/legal/privacy-policy
https://www.zoominfo.com/trust-center/resources-for-customers

Legal basis for data processing

The legal basis for using Zoominfo Websights is Art. 6 Par. 1 lit. f GDPR. Our legitimate interest in using this tool is the realisation of marketing activities to initate new business. The legal basis for using cookies via Zoominfo Websights is Art. 6 Par. 1 lit. a GDPR, your consent. You can withdraw your consent at any time and with immediate effect by going to the data privacy settings.

Data storage

The data collected by Zoominfo Websights will be deleted as soon as the purpose of the processing has been fulfilled, or if you withdraw your consent. Regarding the deletion of personal data collected by Zoominfo Websights, please view their data privacy regulations by clicking on the link above.

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7 What are my rights?

7.1 Your rights

As a party affected by data processing, the DSGVO affords you various rights (in the following collectively referred to as the “rights of affected parties”) which include:

7.2 What are my rights?

Acc. to Art. 15 DSGVO you have the right to ***information*** about storage of your personal data, including any recipientsof that data and the planned duration of storage. Should any incorrect personal data be processed, you have the right acc. to Art. 16 DSGVO to ***correction*** of that data. Within the legal provisions you can request ***deletion*** of your data or ***restriction*** of data processing (Art. 17 and 18 DSGVO), as well as to ***object*** to data processing (Art. 21 DSGVO) and you have the right to ***data portability*** (Art. 20 DSGVO). If processing is based on consent (Art. 6 Par. 1 lit. a or Art. 9 Par. 2 lit. a DSGVO), you can ***withdraw*** your consent at any time and with future effect. If you believe that processing of your personal data violates data privacy law, then you have the right to lodge a ***complaint*** with a supervisory authority in accordance with Art. 77 Par. 1 DSGVO***.***

7.3 Exertion of rights as an affected party

In order to exert your rights as an affected party, please apply to the bodies named in Section 3. Requests submitted electronically will generally be replied to electronically. The information, correspondence and measures which we must provide and take acc. to DSGVO, including those pertaining to the exertion of rights as an affected party, are fundamentally free of charge. Only in cases where requests are obviously unjustified or excessive are we permitted to levy an appropriate charge for our administrative costs, or to refuse to comply with the request (acc. to Art. 12 Par. 5 DSGVO).

If legitimate doubts exist about your identity, we are permitted to demand additional information from you for identification purposes. If it is not possible for us to identify you, we have the right to refuse to comply with your request. We shall inform you separately should identification prove impossible – provided it is within our power to do so (see Art. 12 Par. 6 and Art. 11 DSGVO).

Requests for disclosures and information will usually be managed immediately, at the latest within one month after receipt of the request. This period can be extended by a further two months if necessary due to the complexity and/or number of requests; in the event of a delay, we will inform you of this and give reasons for the delay, at the latest within one month of receiving your request. If we should fail to comply with a request, we will inform you of the reasons for this immediately, at the latest one month after receiving the request, as well as inform you about your options regarding a complaint to a regulatory body and/or the claiming of legal aid (see Art. 12 Par. 3 and Par. 4 DSGVO).

Please note that you can only exert your rights as an affected party within the framework of restrictions and limitations stipulated by the European Union or its member states (Art. 23 DSGVO)

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7.4 Must I grant access to my data?

In order for us to fulfil the conditions laid out in Section 4.1, it is necessary that you grant us access to your personal data.

In order to finalise and implement a contract with you, it is crucial for us and also a legal requirement. If you do not grant us access to your data, we cannot enter into a contract with you.

Should you have a complaint, you can apply to the appropriate regulatory body at any time. The regulatory body named in Section 3.3. is responsible for our company.

You have the right to go to court against a regulatory body acc. to Art. 78 DSGVO, and against our company acc. to Art. 79 DSGVO.

7.5 Automated decision-making/ profiling

We perform no automated decision-making or profiling.

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Commercial Register certificate
HRB 20873, Bad Oeynhausen District Court

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