

## Privacy policy

The use of our website is generally possible without indicating personal data.

Insofar as personal data are collected when you visit our website, we exclusively process this data in accordance with the General Data Protection Regulation (VO (EU) 2016/679; GDPR) and the Federal Data Protection Act of 30 July 2017 (BDSG-neu) as well as the Telemedia Act (TMG). The processing of personal data exclusively occurs in accordance with this privacy policy.

This privacy policy applies to use of the website at the address [www.cctop.de](http://www.cctop.de). For linked content of other providers, the privacy policy provided on the linked website is authoritative.

We hereby inform you that data transmission over the internet may involve security vulnerabilities and cannot be protected even by the technical measures of this website. Complete protection of personal data is not possible when using the internet.

### 1. Controller

The controller is stratEDI Gesellschaft für Kommunikationskonzepte und -lösungen mbH, Lusebrink 9, 59285 Gevelsberg, telephone number +49 (0) 2332 66600-0, email address: [info@stratedi.de](mailto:info@stratedi.de)

Managing director: Thorsten Georg and Marvin Karl

Contact data for the data protection officer:

Olaf Tenti, GDI Gesellschaft für Datenschutz und Informationssicherheit mbH, Körnerstraße 45, 58095 Hagen, email address: [datenschutz@gdi-mbh.eu](mailto:datenschutz@gdi-mbh.eu)

### 2. Web hosting

When accessing our website, data is collected automatically and stored in log files on our server. This data may be of a personal nature. The legal basis for this is Art. 6 (1)(f) GDPR. The collected data includes:

- Name of the website accessed
- Date and time of access
- Volume of data transmitted
- Successful access report
- Internet browser type
- Internet browser version
- The operating system used by the browser
- Previously visited website
- IP addresses

We use the data collected in order to operate the website as well as to guarantee IT security. In case of concrete reasons for suspicion, the log data may be analysed later on.

Data we have stored will be erased after 6 months.

For security reasons and to protect the transmission of confidential content, such as orders or enquiries that you send to use as a website operator, this website uses SSL or TLS encryption. You can recognise an encrypted connection by the address line of your browser changing from "http://" to "https://" as well as the lock symbol in your browser line.

If the SSL or TLS encryption is active, data that you transfer to us cannot be read by third parties.

### **3. Cookies**

This website uses cookies. Cookies are small text files that are stored on your device (PC, laptop, tablet, smartphone). They are used to make the use of our services more pleasant and convenient for you and to provide the services technically. The legal basis is Art. 6 (1) Sentence 1 9 (f) GDPR to pursue our legitimate interest in the pleasant and convenient operation of our website.

We use cookies that are automatically deleted from your hard drive when you close the browser or when you log out (transient cookies, particularly so-called session cookies).

You can change the installation of cookies in your browser settings, or refuse individual cookies or delete them, at any time. However, we inform you that in this case it may not be possible to use all features of this website to their full extent. To secure your privacy, we recommend you to delete the cookies and browser history on your device at regular intervals.

### **4. Contact options**

#### Registration portal:

We process data that we obtain during registration for our clearing centre <https://www.cctop.de>. To use this portal, you can register by providing your company name, company address, your name, your email address and a password of your choice as well as a username (you can choose your username). After registration, you will receive an automatic confirmation email to conclude the contract.

When using the portal, we store your data that is required to implement the contract. This also applies for data which you provide voluntarily. You can manage and modify all information in the protected customer area.

To inform you regarding important changes, such as changes to our services or technically required changes, we use the email address you provided during registration.

The legal basis for data processing is Art. 6 (1)(b) GDPR for contractually required processing.

#### Contact by email:

On our website, it is also possible to contact us by email. In this context, your personal data will be stored and processed for the purposes of communication. All information in this regard is voluntary. The data

collected for this purpose will not be transferred to third parties. The data may be as part of customer relations management (CRM) if you are registered with cctop.

The legal basis is our company's legitimate interest in communication initiated by you (Art. 6 (1) Sentence (f) GDPR).

## **5. Will data be transferred to third parties?**

When using our website, personal data is transferred to third parties.

## **6. Data protection rights**

You have the following rights under the respective legal requirements:

You have the right to information (Art. 15 GDPR, Section 34 Federal Data Protection Regulation (BDSG) in its version valid as of 25 May 2018) as to whether we process personal data concerning you, for what purposes we process this data, which categories of personal data we process concerning you, to whom the data is transferred, how long the data is stored if relevant and the rights to which you are entitled.

To rectification (Art. 16 GDPR): You have the right to request the correction of inaccurate personal data that we have stored concerning you. You also have the right to request us to complete any incomplete data.

The right to erasure (Art. 17 GDPR, Section 35 BDSG): You can request the erasure of personal data concerning you if (1) the data has been processed unlawfully, (2) the purpose for which the data was collected has been achieved, (3) you have withdrawn your consent to data processing and there is no other legal basis for processing, (4) we are subject to a legal obligation to erase the data, (5) you are under the age of 16 or (6) you objected to processing and there are no overriding legitimate grounds for processing on our part.

The right to restriction of processing (Art. 18 GDPR) and data portability (Art. 20 GDPR): You can request us to restrict data processing in the following cases. In these cases, we will mark the data with a blocking notice and will not further process it. (1) If you contest the accuracy of your personal data, for the duration of our review. (2) If you have requested the erasure of data and we are not able or allowed to carry out this erasure. (3) If you require this data for the exercise of legal claims, but we would otherwise be obligated to erase the data because the purpose of processing has been achieved. (4) If you have objected to processing but a final decision has not yet been reached.

The right to object to processing: Where the processing of personal data concerning you is based on legitimate interests on our part, you may object to processing on grounds relating to your particular situation.

Right to portability of data (Art. 20 GDPR): You have the right to receive the personal data concerning you, which you have provided to us under a contract or declaration of consent and which has been automatically processed, in a commonly used and machine-readable format (data record).

You also have the right to lodge a complaint with a supervisory authority (Art. 77 GDPR, Section 19 BDSG): You have the right to lodge a complaint concerning data protection with a supervisory authority. The supervisory authority with jurisdiction over us is the State Officer for Data Protection and Freedom of

Information for North Rhein-Westphalia. Regardless of jurisdiction, this complaint can be lodged with any supervisory authority.

#### **7. Withdrawal of previously granted consent**

If you have consented to our processing of personal data, you have the right to withdraw consent at any time. Please address your withdrawal to the address indicated above or by sending an email to: [info@stratedi.de](mailto:info@stratedi.de)