



HIRSCHMANN  
AUTOMOTIVE

# PRIVACY POLICY

## 1. GENERAL

Hirschmann Automotive GmbH, Oberer Paspelsweg 6-8, 6830 Rankweil, Austria, Tel: +43 5522-307-0, E-Mail: [whistleblowing@hirschmann-automotive.com](mailto:whistleblowing@hirschmann-automotive.com) ("HIRSCHMANN AUTOMOTIVE", "we", "us") is committed to protecting personal data. HIRSCHMANN AUTOMOTIVE therefore observes the applicable legal provisions on the protection, lawful handling and confidentiality of personal data, as well as on data security.

Below, you can find out what information HIRSCHMANN AUTOMOTIVE may collect, process and uses when you visit the HIRSCHMANN AUTOMOTIVE website.

Personal data is always processed on the basis of the applicable legal provisions, in particular the Austrian Federal Act on the Protection of Personal Data (Data Protection Act ("DSG")) and the EU General Data Protection Regulation ("GDPR").

## 2. WHO IS THE DATA CONTROLLER IN THE MEANING OF DATA PROTECTION LAW?

The data controller in the meaning of data protection law is Hirschmann Automotive GmbH, Oberer Paspelsweg 6-8, 6830 Rankweil, Austria, Tel: +43 5522 307-0, E-Mail: [data.protection@hirschmann-automotive.com](mailto:data.protection@hirschmann-automotive.com)

## 3. IS THERE A DATA PROTECTION OFFICER?

No, we have not appointed a data protection officer, as we are not legally required to do so.

## 4. WHAT PERSONAL DATA DO WE PROCESS FOR WHAT PURPOSE AND ON WHICH LEGAL BASIS?

In principle, we process the personal data of our users only to the extent necessary for the provision of a functional website and our content and services. Besides, a data process only takes place based on the user's consent.

### Website availability and creation of log files

Each time you visit our website, our system automatically collects data in order to be able to make the website available to the user. Specifically, the following data is collected: Information about the browser type and version used, the user's operating system, host name of the accessing computer, the user's IP address, date and time of access, website from which the user's system accessed our website (referrer URL).

These so-called log files are automatically generated by our servers when you use our website and are necessary for us to be able to provide you with the requested services. We therefore only process server log files in order to provide you with our website, to distribute web server requests on our server pool, for error detection and correction. This data processing is thus necessary to protect our legitimate interests in providing an error-free and secure website.

### Contacting us

When you fill out the contact form on our Website or establish contact with us via e-mail or through other communication means, we process the data you voluntarily provided us with in the aforementioned media (especially name, e-mail address, nature of the enquiry respectively the subject of your message and the content of your message, as well as other fields in the respective forms on our Website).



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We process the data provided within the course of contacting us solely for processing your enquiry, to get in contact with you if desired and to provide you with the requested information. This data processing is therefore necessary for the fulfilment of our (pre)contractual obligations.

### **Analytics and Marketing**

Based on your consent to the use of cookies, we also collect and process data about your use and interaction with our website for the purpose of statistical analysis of the use of our website as well as for the displaying of suitable advertisements.

This data processing is only carried out on the basis of your consent, which you can revoke at any time.

You can find all details about this data processing activity under point "5. COOKIES AND PLUGINS" below.

### **Newsletter**

On the basis of your consent, we process the personal data you voluntarily provided as part of the newsletter registration (your e-mail address and name) for sending e-mail newsletters about our current projects, marketing and product information.

You can revoke your consent to receive newsletters at any time (also via the unsubscribe link in the e-mail newsletter) with effect for the future and free of charge. Upon receipt of your revocation, we will immediately stop sending you further e-mail newsletters and delete your personal data from the e-mail distribution list.

### **Webshop**

If you visit the Hirschmann Automotive webshop (<https://shop.hirschmann-automotive.com/>) or place orders via the webshop, we process the personal data voluntarily provided in this context (name, e-mail address, password, order data) for the purpose of providing the webshop, managing your self-created account and for the purpose of contract fulfilment or order processing. This data processing is therefore necessary for the fulfilment of our (pre)contractual obligations.

## **5. COOKIES AND PLUGINS**

Our website uses cookies and plugins.

Cookies are text files that are transferred from our web server to your web browser and stored on your device for later retrieval. Cookies enable our website to store important data in order to provide you with our services and to make the use of the website more comfortable.

Some cookies are technically absolutely necessary to provide you with our website. These technically necessary cookies therefore process personal data only to the extent necessary to provide the website. The legal basis for data protection is therefore our legitimate interest in the operation and provision of a functional website.

However, if cookies are used for analytics and marketing purposes, personal data is processed exclusively on the basis of your consent, which can be revoked at any time. This consent is obtained via the cookie banner on our website.

Plugins are small programs that are required to display specific content in the browser and usually establish a connection to a third-party provider for this purpose. Plugins are also used exclusively with your prior consent.

### **Google Analytics**

If you have consented to the use of Cookies, we use "Google Analytics", a web analysis service of Google LLC in the United States ("Google") on our Website. The information generated through the Google Analytics Cookie about the use of the Website are usually transmitted to the servers of Google in the United States of America and stored there.



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Google will use this information to evaluate the usage of our Website by the users, to assemble reports about the activities on our Website and to deliver to us further services connected to the use of the Website. In doing so, pseudonymised user profiles of users can be generated from the processed data. Google will also potentially transmit the data to third parties if legally required or third parties process the data on behalf of Google.

If you have not given your consent, we use Google Analytics only with activated IP anonymization. This means that IP addresses are shortened by Google as soon as data is received by the Analytics Collection Network, before any storage or processing takes place. To our knowledge, the IP address transmitted from your browser is not merged with other data of Google.

You can prevent the general use of Google Analytics by downloading and installing the browser plug-in available through the following link: <https://tools.google.com/dlpage/gaoptout>.

Google will link the usage data with other data about you, such as search history, personal accounts, usage data from other devices, and any other data that Google processes about you as a user. More information about the data usage by Google, settings and objection possibilities are available on the websites of Google: <https://www.google.com/intl/en/policies/privacy/partners>.

### **Google Ads**

We use the remarketing function within the Google Ads service based on your consent. With the remarketing function, we can present users of our website with advertisements based on their interests on other websites within the Google advertising network (in Google Search or on YouTube, so-called "Google Ads" or on other websites). For this purpose, the interaction of the users on our website is analyzed, e.g. which offers the user was interested in, in order to be able to display targeted advertising to the users on other sites even after they have visited our website. For this purpose, Google stores cookies on the end devices of users who visit certain Google services or websites in the Google display network. These cookies are used to record the visits of these users. The cookies are used to uniquely identify a web browser on a specific end device and not to identify a person.

You can prevent participation in this remarketing process by installing the plug-in provided by Google at the following link: <https://www.google.com/settings/ads/plugin>.

You can find more detailed information on Google's data protection here: <https://policies.google.com/privacy?hl=d>.

### **Facebook**

We use the Facebook pixel from Facebook on our website based on your consent. For this purpose, we have implemented a code on our website. The Facebook pixel is a snippet of JavaScript code that loads a collection of functions that allow Facebook to track your user actions if you came to our website via Facebook ads. For example, when you purchase a product on our website, the Facebook pixel is triggered and stores your actions on our website in one or more cookies. These cookies allow Facebook to match your user data (customer data such as IP address (anonymized), user ID) with your Facebook account data. Then Facebook deletes this data again. The collected data is anonymous and not visible to us and can only be used in the context of ad placements. If you yourself are a Facebook user and are logged in, your visit to our website is automatically assigned to your Facebook user account.

We want to show our products only to those people who are really interested in them. With the help of Facebook pixels, our advertising measures can be better tailored to your wishes and interests. Thus, Facebook users (if they have allowed personalized advertising) get to see suitable advertising. Furthermore, Facebook uses the collected data for analysis purposes and its own advertisements.

Due to the Facebook pixel, your browser automatically establishes a direct connection with the Facebook server as soon as you have agreed to the use of cookies. By integrating the Facebook pixel, Facebook thus receives the information that you have called up the corresponding web page of our website, or clicked on an ad of ours. If you are registered with a Facebook service, Facebook can assign the visit to your account.

Deactivating the Facebook pixel is possible via the following link:



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<https://www.facebook.com/settings/?tab=ads#>.

### **LinkedIn**

Based on your consent, our website uses the conversion tool "LinkedIn Insight Tag" from LinkedIn Ireland Unlimited Company. This tool creates a cookie in your web browser, which enables the collection of the following data: IP address, device and browser properties and page events (e.g. page views). This data is encrypted, anonymized within seven days, and the anonymized data is deleted within 90 days. LinkedIn does not share any personal data with us, but offers anonymized reports on website audience and ad performance. In addition, LinkedIn offers the possibility of retargeting via the Insight Tag. We can use this data to display targeted advertising outside of its website without identifying you as a website visitor. You can find more information about data protection at LinkedIn in the LinkedIn privacy notices.

LinkedIn members can control the use of their personal data for advertising purposes in their account settings.

### **Snapchat**

Based on your consent, we use the so-called "Snap Pixel" of Snap Inc., 2772 Donald Douglas Loop North, Santa Monica, CA 90405, USA to create so-called "Custom Audiences". This serves the purpose of optimizing our advertisements in the Snap social network, playing out only relevant advertisements there and measuring the success of our Snap advertising campaigns. The Snap Pixel enables Snap to identify visitors to our websites as a target group for the display of ads on the Snap social network. Via the Snap Pixel implemented on the websites, a direct connection to the Snap servers is established when the websites are visited. In the process, it is transmitted to the Snap server that you have visited our websites as well as which pages you have seen. In addition, individual information and parameters required for the optimization of our advertisements, for increasing the relevance as well as for

measuring the success are transmitted. In particular, this is information on so-called "conversion events" (e.g. whether a registration or a purchase has taken place).

For more information on the collection and use of data by Snap, as well as your rights in this regard and options for protecting your privacy, please see Snap's privacy policy at <https://www.snap.com/privacy/privacy-center/>.

### **TikTok**

We use the TikTok Pixel on our website. The TikTok Pixel is a TikTok Advertiser Tool provided by TikTok Technology Limited, 10 Earlsfort Terrace, Dublin, D02 T380, Ireland, and TikTok Information Technologies UK Limited, WeWork, 125 Kingsway, London, WC2B 6NH, United Kingdom (together "TikTok"). The TikTok Pixel is a JavaScript code snippet that allows us to understand and track visitors' activity on our website. For this purpose, the TikTok Pixel collects and processes information about the users of our website or the devices they use. The data collected through the TikTok Pixel is used for targeting our ads and improving ad delivery and personalized advertising. For this purpose, the data collected on our website by means of the TikTok Pixel is transmitted to TikTok. In part, this data is information stored in the terminal device you are using. In addition, cookies are also used via the TikTok Pixel, via which information is stored on your end device used. Such storage of information by the TikTok Pixel or access to information already stored in your terminal device will only occur with your consent.

For more information on how TikTok processes personal data, including the legal basis on which TikTok relies and how you can exercise your rights against TikTok, please see TikTok's privacy policy at <https://www.tiktok.com/legal/privacy-policy-eea?lang=en>.

## **6. WHERE DOES THE PERSONAL DATA COME FROM?**

The personal data we process within our website is generally obtained from the user himself/herself or is obtained in the course of using our website.

## **7. TO WHOM IS PERSONAL DATA DISCLOSED?**



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Within our company, only those persons have access to personal data in the context of our website who absolutely need this data.

Personal data is only transferred to recipients outside our company if we are legally entitled or obliged to do so. Under these conditions, external recipients of personal data may be, for example, authorities, courts, consultants, experts or legal representatives.

In addition, we transfer personal data to the necessary extent to external service providers (so-called data processors) who process the data on our behalf on the basis of separate contractual agreements. These external service providers include, for example, IT service providers or software providers.

## **8. IS DATA TRANSFERRED TO RECIPIENTS OUTSIDE THE EU?**

Processing of your data in a third country outside the European Union (EU), respectively the European Economic Area (EEA) or when using services of third parties is only carried out where it is necessary for the performance of our (pre)contractual obligations, on the basis of your consent, due to a legal obligation or on the basis of legitimate interests.

We have implemented suitable and appropriate guarantees to develop a way of transmission of your data to the respective third country compliant with data protection (eg. by concluding so-called "EU-Standard Contractual Clauses"). Upon your request we can transmit a copy of those suitable guarantees to you, provided that we process or let your data be processed in third countries.

## **9. HOW LONG ARE PERSONAL DATA STORED?**

We store your personal data only as long as it is necessary for the purposes for which it is processed. In addition, we may be obliged to store your data for a longer period due to corresponding statutory retention periods.

Specifically, we store your data in connection with contacting us due to corresponding legal retention obligations for a period of generally seven years.

Server log files are generally stored for a maximum of 15 days and then deleted.

We store data in connection with cookies at the longest until you revoke your consent.

If you have registered for our newsletter and are not otherwise a customer of ours, we store your data until you revoke your consent.

In addition, we store your personal data beyond the aforementioned periods for as long as legal claims can be asserted from the relationship between you and us and only if proceedings are concretely emerging, or until final clarification of a concrete incident or legal dispute. This longer retention is based on legitimate interests in the assertion, clarification and defense of legal claims.

## **10. IS THE DATA SUBJECT TO AUTOMATED DECISION-MAKING?**

No, we do not perform any automated decision-making or profiling.

## **11. IS THE PROVISION OF PERSONAL DATA REQUIRED BY LAW OR CONTRACT?**

No, the user is under no legal or contractual obligation to provide us with personal data.

## **12. WHICH RIGHTS DO DATA SUBJECTS HAVE?**



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The data subject has a right of **access** to the personal data processed by us. In addition, the data subject has a right to **rectification** if the data processed by us is incomplete or incorrect. In addition, the data subject has - if the legal requirements are met - a right to **erasure** of his or her personal data and a right to **restriction** of processing. In addition, the data subject has a right to **data portability**. Insofar as the processing of personal data is carried out for the protection of legitimate interests, the data subject also has the right to **object** to the processing of such data on grounds relating to his or her particular situation.

In addition, the data subject has the **right to lodge a complaint** with the (Austrian) data protection authority if he or she believes that the processing of his or her personal data is not carried out lawfully.

If the processing of personal data is based on consent, the data subject also has the right to **revoke his or her consent at any time**.

To safeguard these rights, the data subject is welcome to contact us at any time at: [data.protection@hirschmann-automotive.com](mailto:data.protection@hirschmann-automotive.com).

**December 2024**