

PRIVACY POLICY SOCIAL MEDIA

Stand: November 2022

The following Policy describes how and for what purpose WINGAS Group (hereinafter also “We”) processes personal data in connection with the social media channels it operates.

You can reach our data protection officer at the above address, attn: data protection officer, or at datenschutz@wingas.de.

1. RESPONSIBILITY FOR DATA PROCESSING

We, WINGAS GmbH, have social media accounts on the networks of LinkedIn, XING/kununu, YouTube. As operators of these channels We are, together with the respective network operators,

- LinkedIn: LinkedIn Ireland Unlimited Company Wilton Place, Dublin 2, Irland, in the following: **LinkedIn**,
- XING/kununu: New Work SE, Am Strandkai 1, 20457 Hamburg, Deutschland, in the following: **XING/kununu**,
- YouTube: Irland Ltd., Gordon House, Barrow Street, Dublin 4, Irland, in the following: **YouTube**

data controller in terms of Art. 4 No. 7 of the General Data Protection Regulation (GDPR).

As joint controllers for these channels, We have entered into agreements with the network operators, which, among other things, regulate the conditions for the use of channels and similar appearances. The following agreements are applicable in each case:

LinkedIn: [Data Processing Agreement](#) from LinkedIn,

XING/kununu: [Privacy Policy](#) of XING,

YouTube: [Privacy Policy](#) and [Terms of Service of](#) YouTube/Google.

When visiting our social media sites, personal data of the site visitors are processed by the controllers as follows.

2. USE OF INSIGHTS, ANALYSES UND COOKIES

In the context of our social media channels operations, We use the analysis functions provided by the network operators to obtain aggregated statistical evaluations on the use of our social media channels.

For this purpose, cookies and similar technologies such as Tracking-Pixel are used by the network operators and a unique personal identifier is created in each case. The identifier can be linked to the data of users who are registered with the social media platform.

The information stored to the identifier is processed by the platform operators, especially when the user calls up these services. This data may be used by the network operators in their own responsibility and for their own market research and advertising purposes over which We have no control. Other parties such as partners or even third parties may also use cookies and other technologies within these services in order to provide services to companies advertising on the platforms. Please refer to the data privacy policies of the network operators for further information:

LinkedIn: in the context of our LinkedIn profile operation We use LinkedIn Page Analytics. This provides us with information about the use of our content. For more information about the LinkedIn platform's data privacy regulations, please refer to the LinkedIn [Privacy Policy](#).

XING/kununu: in the context of our XING profile operation, We use the XING TalentManager. This provides us with information about the network users, which We use for a targeted contacting of the candidates as part of our recruitment process. For more information on the data privacy of the XING platform and its applications, please refer to the XING [Privacy Policy](#).

YouTube: in the context of our YouTube account operation We use YouTube analytics function. With YouTube analytics function We can analyse the usage and statistically evaluate it. You can find more information in the Google [Privacy Policy](#).

3. PURPOSES OF PROCESSING

The processing of this information should, on the one hand, enable network operators to improve their system of advertising which they disseminate through their networks. On the other hand, it is also intended to enable us, as the operator of the social media channels, to obtain statistics which are compiled on the basis of visits to our social media channels. This is intended to control the marketing of our activities. For example, it enables us to understand trends in the profiles of visitors who value our social media channels or use applications of the sites to provide them with more relevant content and develop features that may be of greater interest to them.

To help us better understand how our social media sites can be used to support our business objectives, demographic and geographic analyses are also prepared and made available to us based on the information collected. For example, We may use this information to serve targeted interest-based advertisements. However, We do not obtain direct knowledge of the identity of the visitor in this process. If visitors use social media services on several end devices, the collection and evaluation can also be carried out across devices and platforms, if the visitors are registered and logged in to their own profiles.

Visitor statistics are only transmitted to us in anonymised form and We have no access to the underlying data.

We use our social media channels also for the purpose of staff recruitment. On the basis of the published information, We search for potentially interesting candidates for our vacancies and approach them specifically as part of the recruitment process. In this context, We may receive additional information, e.g. due to user comments, private messages or due to you following us or sharing our content. This information is processed solely for the purpose of communication and interaction with you.

We use our social media channels to communicate with our customers, interested parties and users and to inform them about our range of services. In this context, We may receive additional information, e.g. due to user comments, private messages or due to you following us or sharing our content. This information is processed solely for the purpose of communication and interaction with you.

4. LEGAL BASIS AND LEGITIMATE INTERESTS

We operate our social media channels in order to present ourselves to the users of these platforms and other interested persons who visit our social media channels and to communicate with them. The processing of users' personal data is carried out on the basis of our legitimate interests in an optimised presentation of our company and services (Art. 6 para. 1 sentence 1 lit. f GDPR), as well as on the basis of pre-contractual steps with the interested parties (Art. 6 para. 1 p. 1 lit. b DSGVO).

5. TRANSFER OF DATA

For Twitter, YouTube, LinkedIn and XING/kununu, it is possible that some of the information collected is also processed outside the European Union in the United States of America (USA).

The USA are a so-called unsafe third country. A third country is considered to be unsafe if the EU Commission has not issued an adequacy decision for this state in accordance with sec. 45 para. 1 GDPR, which confirms that the country provides an adequate protection for personal data.

With the ECJ ruling of 16 July 2020 (C-311/18), the (partial) adequacy decision for the USA, the so-called Privacy Shield, was declared void. The USA does not offer a level of data protection comparable to that in the EU. The following risks exist when personal data is transferred to the USA: There is a risk that U.S. authorities may gain access to personal data on the basis of the PRISM and UPSTREAM surveillance programs based on Section 702 of the FISA (Foreign Intelligence Surveillance Act), as well as on the basis of Executive Order 12333 or Presidential Police Directive 28. EU citizens do not have effective remedies for legal protection against such accesses in the USA or the EU.

LinkedIn: LinkedIn transfers data to LinkedIn Corporation 1000 W Maude Ave Sunnyvale, CA, USA based on [Standard Contractual Clauses](#) approved by the European Commission. We have no control over these processing operations. We ourselves do not share any personal information obtained through our LinkedIn profile.

XING/kununu: XING transfers data to third countries for the purposes of contract fulfilment. We have no control over these processing operations. We ourselves do not share any personal information obtained through our LinkedIn profile.

YouTube: YouTube submits data based on [Standard Contractual Clauses](#) approved by the European Commission to Google LLC, 1600 Amphitheatre Parkway Mountain View, CA 94043, USA. We have no control over these processing operations. We ourselves do not pass on personal data that We receive via our YouTube channel.

6. ESSENCE OF JOINT RESPONSIBILITY / ASSERTAION OF DATA SUBJECT RIGHTS

You can assert your data subject rights towards us or directly towards the respective network operator.

The agreement We have entered into with **LinkedIn** states that LinkedIn will inform us as soon as data subject exercise their data subject rights (Art. 15 – 22 GDPR). LinkedIn will assist in responding to requests for information. You can enforce your data subject rights against us and LinkedIn.

The agreement We have entered into with **XING/kununu** provides for you to enforce your data subject rights against us and XING. As a user on the social network XING, you can request this information [here](#).

The agreement We have entered into with Google in relation to our **YouTube** channel provides for you to enforce your data subject rights against us and Google.

7. RIGHT TO OBJECT

In particular, you have the following possibilities to enforce your right to object:

LinkedIn: you can object to the processing by LinkedIn [here](#). Further settings can be made using the [Data Processing Restriction and Objection](#).

XING: you can object to the processing by using the XING [Contact Form](#).

YouTube: you can object to the processing by YouTube via the [settings in the Google Account](#). More information on how to manage privacy settings can be found [here](#).

8. FURTHER INFORMATION AND CONTACT DATA

Further information on our contact details, data subject rights towards us and how personal data is processed by us can be found in the [Privacy Information](#) on our website. You can reach our data protection officer at SEFE Securing Energy for Europe GmbH, attn: data protection officer, Königstor 20, 34117 Kassel or via datenschutz@wingas.de.

More information about the handling of personal data, can be found in privacy policies of [LinkedIn](#), [XING/kununu](#), [YouTube](#).

This Privacy Policy is dated November 2022.