



## **Dear applicants and employees**

We are fulfilling our information obligation related to the new European data protection regulation. This document transparently informs you of how we are handling your personal data.

### **1. Name and contact data of the responsible**

Responsible for the acquisition and processing of your personal data, and therefore also the compliance of the data protection regulations, is **asap endoscopic products GmbH**.

Our contact data is as follows:

**asap endoscopic products GmbH**  
Internet: <http://www.asap-gmbh.de>

**Owner:**  
**Horst Baholzer**

**Stöckmatten 19**  
**79224 Umkirch**

**Tel.: +49 (0)7665 / 94 773-0**  
**Fax: +49 (0)7665 / 94 773-11**  
**E-Mail: [hob@asap-gmbh.de](mailto:hob@asap-gmbh.de)**

### **2. Contact data of the appointed data protection officer**

If required, you can reach out to our appointed data protection officer as follows:

**Herr Andreas Steinbach**  
**Ingenieurbüro Hopp + Flaig**

**Augustenstr. 2**  
**70178 Stuttgart**  
**Germany**

**Tel.: 0711 / 320657-25**  
**Fax: 0711 / 320657-77**  
**E-Mail: [steinbach@hopp-flaig.de](mailto:steinbach@hopp-flaig.de)**



### **3. Type of collected data / purpose of data acquisition**

#### **3.1 Communications and digital data**

For every online access of our site and every file retrieval, data about this procedure will be processed and stored in a log file temporarily.

The following data is always stored for every access/retrieval in the log file referred to above:

- IP address
- date and time
- accessed page/name of the accessed file
- transmitted amount of data
- notification, if the attempt to access/retrieval was successful
- browser inclusive version of the operating system
- in case of an error, an error message will be saved

The data referred to above are solely used for statistical purpose in order to improve our offering. Once evaluated they will be deleted.

There is no other usage or transfer of data to third parties.

#### **Usage of cookies**

(1) In addition to the data listed above, cookies will be stored on your computer when using our web page. Cookies are small text files assigned by the Internet browser you are using which are stored on your hard drive. Cookies are neither able to execute a computer program or application nor are they able to transmit a virus onto your computer.

We rely on cookies to make our online presence more user-friendly and efficient.

(2) This web page relies on the following two types of cookies:

- transient cookies (see a.)
- persistent cookies (see b.)

(a) Transient cookies (mostly session cookies) are deleted automatically as soon as your Internet browser is closed. Session cookies are used to store a so-called session IDs. Session IDs allow us to recognize your browser once you return to our web page. Session cookies are immediately deleted as soon as you log out or close your browser.

(b) Persistent cookies are automatically deleted according to a pre-defined period of time, which can vary based on the specifics of the persistent cookie used. Cookies can be deleted at any point in time using the security settings of your browser.



1. You are able to configure your browser settings based on your personal preferences. This enables you, for example, to refuse the acceptance of third party cookies or any other cookies. So-called third party cookies are cookies which are placed by a third party, which means not through the actual web page that you are visiting. While you are able to deactivate cookies, please be aware that this might stop you from using the entire functionality of web pages, including our web page.
2. We are also relying on cookies to be able to recognize you in case of subsequent visits. This is beneficial for you if you have a user account with us. Otherwise you are required to login every time you visit our web page.

Session cookies don't contain personal data and expire right after the expiration of the session.

If you prefer, you can prevent the storage of cookies on your hard drive, as well as the display of web beacons on your computer. To do this, adjust your browser settings by selecting "no acceptance of cookies" as follows for:

- Internet-Explorer: Refer to "Extras" / "Internet options" / "Data Protection / Settings"
- Firefox: Refer to "Extras" / "Settings" / "Data Protection" / "Cookies"

## **Usage of Google Maps**

(1) On this web page we are relying on Google Maps to provide you with interactive maps embedded in our web page. The benefit is a comfortable, user-friendly, powerful maps function.

(2) By accessing Google Maps from our website, Google receives the information that you have accessed it. Your actions taken on Google Maps are collected and the related data will be transmitted to the company. The results of your actions being displayed are obtained from Google. This does not require Google login, and it is not necessary to have a Google account. If you are logged into your Google account, your data is associated with your account. You can reject the association to your profile by logging out before the activation of the respective button.

Google stores your data as user profile and uses it for advertisement purposes, market research and/or to optimize the company's own web page.

Google's analytic results (even for users not being logged in), contribute to the company's core business which is the provision of needs-based advertisement, which the company might share with some of their business partners.

You do have a right to object when it comes to the establishment of such a user profile which you have to exercise with Google directly.

(3) Additional information related to the purpose and the extent of the data acquisition and data processing can be obtained by reading the data protection declaration of Google. This document also includes additional information, for example, your respective rights as well as the setting options related to the protection of your privacy:

[www.google.de/intl/de/policies/privacy](http://www.google.de/intl/de/policies/privacy)



Processing your personal data also in the USA, Google has submitted itself to the EU-US Privacy Shield agreement: <https://www.privacyshield.gov/EU-US-Framework>.

### **3.2 Personal data**

To exercise and secure our business we need your personal data as follows:

- Evaluation and processing of incoming applications
- Conducting applicant interviews
- Selecting applicants
- Entering into an employment contract (establishing an employment relationship)
- Implementation of the employment relationship
- Termination of employment
- The legal retention periods also apply to the retention and storage of the data referenced above

### **4. Legal foundation**

The processing of personal data is only legitimate if there is a legal foundation for it. The processing of your personal data on our homepage is based on the following legal foundation:

***Article 6 General Data Protection Regulation, paragraph 1 a-f***

### **5. Legitimate interest of the responsible party/purpose of data collection**

The data listed under point number 3 (above) are required for the following purposes:

- For quality assurance purposes and ensuring the functionality of our web presence.
- For statistical purposes for the continuous improvement of our web presence
- Additionally in order to recruit and hire new and suitable employees or for the initiation, implementation and termination employment, we require a minimum amount of personal data

We always follow the principle of data minimization and do not collect any personal data which we do not absolutely need in accordance with point 3 of this data protection declaration.

In case we need to collect additional personal data, which are not listed under point 3 (above) we would explicitly ask you for consent.

## **6. Internal and external transfer of your personal data**

The internal transfer of your personal data is solely limited to the purposes stated in point number 3 of this data protection declaration in accordance with the principles of data minimization and other principles of data protection.

An external transfer of your personal data can take place under the following circumstances:

- Passing on your personal data (contact data) to contractors, subcontractors or cooperation partners in the context of the execution of the employment relationship, may happen if necessary for the fulfilment of orders

A possible data transfer always takes place only to the extent necessary. Where possible, your personal data will not be passed on

- Collaboration with subcontractors for which access to your personal data is necessary or at least cannot be completely avoided. This includes, for example, IT support services, payroll services or the use of tax consulting services.
- Passing on your personal data (contact data) within the scope of supplier management, in case this is necessary for the fulfilment of orders (contracts). A possible data transfer always takes place only to the extent necessary. Wherever possible, your personal data will not be passed on to third parties
- Passing on your personal data to authorities and health insurance companies due to legal obligations

## **7. Transfer of your data to a third country (outside the European Union or an international organization)**

We do not transfer your personal data to a non-EU country or to an international organization. Should this be necessary, we would inform you in advance about it. Before doing so we would ensure all necessary measures to maintain an appropriate level of data protection.

## **8. Storage period and deletion of your personal data**

The legislator has issued a variety of retention options which we follow carefully including seeking expert advice in order to comply with these obligations.

The following applies in general: We only store your personal data:

- for as long as permitted for the specified purpose,
- it is prescribed by law for verification purposes

In case we need to store your data for a longer period than referred to above, we would we would have this confirmed by you with a voluntary declaration of express consent.



## **9. Right to information, deletion, correction, objection and restriction of usage of your personal data**

You have the right to demand confirmation from us if we were processing your personal data. If so, you have the right to information about this personal data and the following information:

- Purposes of processing
- The categories of personal data processed
- The recipients or category of recipients to whom we disclosed or intend to disclose your personal data, particularly if recipients are in non-EU countries or international organizations
- If possible, the planned duration for which your personal data are stored, or, if that is not possible, the criteria applied to the determination of the duration
- The right to have personal data relating to you corrected or deleted, or have personal data processed by us limited or object to such processing
- The existence of a right of appeal at a supervisory authority
- If personal data was not collected from the individual concerned, all information available with regards to the origin of the data
- The existence of an automated decision making, including profiling (meaningful information related to the logic applied, the scope of it as well as the intended effects of such processing on you)

In case your personal data is transmitted to a third country or an international organization, you have the right to be informed about the suitable guarantees that ensure an adequate level of data protection in the context of the transmission

We provide you with a free of charge copy of your personal data which are subject to our processing. For any additional copies requested we may ask you to provide us with an appropriate payment which would allow us to cover our administration cost.

If you submit the application electronically, you will receive the information in a common electronic format, unless you specify otherwise.

The right of obtaining a copy may be restricted in so far as it affects the rights or the freedom of other persons.

You have the right to request us to immediately correct any incorrect personal data concerning you. For the purposes of processing, you have the right to request the completion of incomplete personal data, also by means of an additional declaration. In order to exercise this right, you are welcome to contact our data protection officer.



You have the right to ask for the deletion of your personal data stored by us in case one of the following criteria is met:

- The personal data is not needed anymore to fulfil the agreed purpose
- You withdraw the voluntary declaration of expressed consent that you provided us with (however, the legality of the processing carried out on the basis of the consent until revocation remains unaffected)
- Your personal data has so far been processed unlawfully
- A legal obligation related to the deletion does exist
- The personal data was collected in relation to services offered by the Information Society – refer to Art.1 Nr.1b of (EU) 2015/1535 (persons under 16 years of age)

Furthermore you have the right to demand from us the restriction of the processing in case one of the following conditions are met:

- In case you deny the correctness of the personal data we will stop the processing of them for a period of time that would allow us to verify their correctness
- The processing is unlawful and you refuse the deletion of your personal data and instead request that the use of your personal data be restricted.
- If we no longer need your personal data for the purposes of processing, but you do need it to assert, exercise or defend legal claims.
- If you have filed an objection against the processing, until it has been determined whether our justified reasons outweigh yours

## **10. Right to data transferability**

You have the right to receive your personal data stored by us in a structured, common and machine-readable format, insofar as they are processed in an automated process. You also have the right to transfer this data to another person in charge (“responsible”), without any hindrance by us, to whom the personal data was provided.

When exercising your right to data transferability, you have the right to have your personal data transferred directly by us to another responsible person, insofar as this is technically feasible.

The right to data transferability may be restricted in so far as the rights or freedoms of other persons are affected by the exercise of this right.



#### **11. Right of revocation for consents and continuation of consents granted**

In case as we process your personal data on the basis of a declaration of consent, you have the right to revoke the consent given. However, this does not affect the legality of the processing carried out on the basis of the consent until revocation. With regard to compliance with storage periods, point 8 of this data protection declaration must also be observed in this respect.

#### **12. Right of appeal to the supervisory authority**

If you see the need to complain to the competent supervisory authority, you are free to do so at any time.

#### **13. Mandatory submission of your personal data and possible consequences if the submission is refused.**

In order to maintain the functionality and to continuously improve our website, we require the data mentioned under point 3 of this data protection declaration. Without this data collection a correct use of our Internet offering is not possible.

#### **14. Automatic decision making and profiling**

There is no automated decision making regarding your person. No "profiling" is carried out based on the personal data collected from you.

#### **15. Change of purpose**

If we intend to change the purpose for which your personal data was originally collected, we will inform you in advance in detail and transparently. In this case, we will of course provide you with all the information required by law. If the change of purpose involves the processing of personal data based on contractual basis of a voluntary declaration of consent, we will inform you accordingly and ask you for your formal consent.

#### **16. Open questions, complaints or suggestions**

You are welcome to contact us with any questions, complaints or suggestions regarding data protection. If required, you are welcome to contact our data protection officer (see item no. 2 of this data protection declaration).

*Last update: July 25, 2018*