

# Data Protection

In the following, we will inform you about the type, scope and purpose of the processing of personal data by our company in accordance with the legal requirements of data protection law (in particular according to BDSG n.F. and the European General Data Protection Regulation 'GDPR'). This data protection declaration also applies to our websites and social media profiles. Regarding the definition of terms such as "personal data" or "processing", we refer to Art. 4 GDPR.

Name and contact details of the person responsible

Our responsible (hereinafter "responsible within the meaning of Art. 4 no. 7 GDPR is:

OSTA Trading GmbH Senefelder Ring 83

21465 Reinbek, Germany

Managing Directors: Oleksii Kolesnykov, Robert Stadthaus-Meister

Commercial Register / No .: HRB 15024 HL

Register court: Lübeck Fax: +49 40 736 762 - 90

Email address: [rs@osta-trading.com](mailto:rs@osta-trading.com)

Data protection officer

Robert Stadthaus-Meister Senefelder Ring 83

21465 Reinbek, Germany

[rs@osta-trading.com](mailto:rs@osta-trading.com)

Fax: +49 40 736 762 - 90

Types of data, purposes of processing and categories of data subjects

Below we inform you about the type, scope and purpose of the collection, processing and use of personal data.

## 1. Types of data that we process

Usage data (access times, visited websites etc.), inventory data (name, address etc.), contact details (telephone number, email, fax etc.), payment data (bank data, account data, payment history etc.), contract data (object of the contract, term etc.), content data (text input, videos, photos etc.), communication data (IP address etc.),

## 2. Purposes of processing according to Art. 13 Para. 1 c) GDPR

Processing contracts, purposes of evidence / preservation of evidence, optimizing the website technically and economically, enabling easy access to the website, fulfilling contractual obligations, contacting legal complaints by third parties, fulfilling legal retention obligations, optimizing and statistical analysis of our services, supporting the commercial use of the website, improving the user

experience , Make the website user-friendly, Economical operation of advertising and website, marketing / sales / advertising, compiling statistics, determining the likelihood of copying of texts, avoiding SPAM and misuse, handling an application process, customer service and customer care, handling contact requests, providing websites with functions and content , Security measures, uninterrupted, secure operation of our website,

### 3. Categories of data subjects according to Art. 13 Para. 1 e) GDPR

Visitors / users of the website, customers, suppliers, interested parties, applicants, employees, employees of customers or suppliers,

The data subjects are collectively referred to as "users".

Legal basis for the processing of personal data

Below we inform you about the legal basis for the processing of personal data:

1. If we have obtained your consent for the processing of personal data, Art. 6 para. 1 sentence 1 lit. a) GDPR legal basis.
2. If processing is necessary to fulfil a contract or to carry out pre-contractual measures that are carried out at your request, Art. 6 para. 1 sentence 1 lit. b) GDPR legal basis.
3. If processing is necessary to fulfil a legal obligation to which we are subject (e.g. statutory retention requirements), Art. 6 para. 1 sentence 1 lit. c) GDPR legal basis.
4. If processing is necessary to protect the vital interests of the data subject or another natural person, Art. 6 para. 1 sentence 1 lit. d) GDPR legal basis.
5. If processing is necessary to safeguard our or the legitimate interests of a third party and your interests or fundamental rights and freedoms do not outweigh this, Art. 6 para. 1 sentence 1 lit. f) GDPR legal basis.

6. The data protection information, information and objection options (opt-out) of the respective networks / service providers can be found here:

- XING - service provider: XING AG, Dammtorstraße 29-32, 20354 Hamburg, Germany) - data protection declaration / opt-out: <https://privacy.xing.com/de/datenschutzerklaerung>.

- LinkedIn - service provider: LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland) - data protection declaration: <https://www.linkedin.com/legal/privacy-policy>, cookie policy and opt-out: <https://www.linkedin.com/legal/cookie-policy>, Privacy Shield of the US company LinkedIn Inc.: <https://www.privacyshield.gov/participant?id=a2zt000000LOUZAA0&status=Active>.

## Social media plug-ins

1. We use social media plug-ins from social networks on our website. We use the so-called "two-click solution" from c't or heise.de:

<https://www.heise.de/ct/artikel/Shariff-Social-Media-Buttons-mit-Datenschutz-2467514.html>; Service provider: Heise Medien GmbH & Co. KG, Karl-Wiechert-Allee 10, 30625 Hanover, Germany; Data protection:

<https://www.heise.de/Datenschutzerklaerung-der-Heise-Medien-GmbH-Co-KG-4860.html>.

2. Data category and description of data processing: usage data, content data, inventory data. When you access our website, "Shariff" does not transmit any personal data to the third-party providers of the social plug-ins. In addition to the logo or brand of the social network, you will find a controller with which you can activate the plug-in with a click. This activation represents your consent in such a way that the respective provider of the social network receives the information that you have accessed our website and that your personal data is transmitted to the provider of the plug-in and stored there. These are so-called third-party cookies. With some providers such as Facebook and XING, their IP is anonymized immediately after collection. The plug-in provider stores the data collected about the user as usage profiles. You can withdraw your consent at any time by deactivating the controller.

3. Purpose of data processing: improvement and optimization of our website; Increasing our awareness through social networks; Possibility of interacting with you and the user with each other via social networks; Advertising, analysis and / or custom design of the website.

4. Legal basis: The legal basis for the processing of personal data is our legitimate interest in the above purposes according to Art. 6 Para. 1 S. 1 lit. f)

DS-GMO. Insofar as you have given us or the person responsible for the social network consent to the processing of your personal data, the legal basis is Article 6 (1) sentence 1 lit.

a) i.V.m. Art. 7 GDPR. In the case of pre-contractual inquiries or when using your personal data to fulfill the contract, Art. 6 Para. 1 S. 1 lit. b) GDPR legal basis.

5. Data transmission / recipient category: social network; if the US providers are certified under the Privacy Shield Agreement (<https://www.privacyshield.gov/EU-US-Framework>), it is ensured that European data protection law is complied with.

6. Social networks used and opposition: We refer to the respective data protection declarations of the social networks with regard to the purpose and scope of data collection and processing. You will also find information on your rights and setting options for protecting your personal data. You have a right to object to the creation of these user profiles, whereby you can contact the respective plug-in provider directly to exercise these rights.

## XING

1. We have plug-ins from the social network XING (XING AG, Dammtorstraße.29-32, 20354 Hamburg, Germany) on our website as part of the so-called "two-click solution" from Shariff. You can recognize this by the Share button with the white XING logo and the "X" symbol on a green background.

2. If you willingly activate the XING share button on our website, this will cause your browser to connect to the XING server when you visit the respective website. According to XING, no data about the call are stored from which XING could derive a direct personal reference. In particular, XING does not save any of your IP addresses and does not use cookies. When you click the Share button, you will be redirected to the XING homepage, where you can - if you are logged in - recommend our site, which serves to increase our awareness and reach. With regard to these activities on the XING platform, the XING data protection declaration mentioned below applies.

3. If you log out of XING before visiting our website and delete your cookies, no data about your visit to our website will be assigned to your profile on XING when you activate the plug-in.

4. The purpose and scope of the data collection and its further processing and use of the data by XING as well as your rights and setting options for protecting your privacy can be found in XING's data protection information on the Share button at [https://www.xing.com/app/share%3Fop%3Ddata\\_protection](https://www.xing.com/app/share%3Fop%3Ddata_protection) and XING's general data protection declaration at <https://privacy.xing.com/de/datenschutzerklaerung>.

### Data protection for applications and in the application process

1. Applications that are sent to the responsible person electronically or by post are processed electronically or manually for the purpose of handling the application process.

2. We expressly point out that application documents with "special categories of personal data" in accordance with Art. 9 GDPR (e.g. a photo that gives conclusions about your ethnic origin, religion or marital status), with the exception of a possible severe disability, which You want to disclose freely, are undesirable. You should submit your application without this data. This has no impact on your application chances.

3. The legal bases for processing are Art. 6 Para. 1 S.1 lit. b) GDPR and § 26 BDSG n.F.

4. If an employment relationship is entered into with the applicant after the application process has been completed, the applicant data will become more relevant with due regard

Data protection regulations saved. If you are not offered a job after completing the application process, your application letter and documents will be deleted 6 months after the rejection has been sent in order to be able to meet any claims and verification requirements under the AGG.

#### Rights of the data subject

##### 1. Objection or revocation against the processing of your data

Insofar as the processing is based on your consent in accordance with Art. 6 para. 1 sentence 1 lit. a), Art. 7 GDPR, you have the right to withdraw your consent at any time. This does not affect the lawfulness of processing based on consent before its withdrawal.

Insofar as we process your personal data based on the balancing of interests in accordance with Art. 6 Para. 1 S. 1 lit. f) support GDPR, you can object to the processing. This is the case if the processing is not particularly necessary to fulfill a contract with you, which is described by us in the following description of the functions. When exercising such an objection, we ask you to explain the reasons why we should not process your personal data as we have done. In the event of your justified objection, we will examine the situation and either stop or adjust the data processing or show you our compelling reasons worthy of protection, on the basis of which we will continue the processing.

You can object to the processing of your personal data for advertising and data analysis purposes at any time. You can exercise the right to object free of charge. You can inform us about your objection to advertising using the following contact details:

OSTA Trading GmbH Senefelder Ring 83

21465 Reinbek, Germany

Managing Director Robert Stadthaus-Meister, Oleksii Kolesnykov

Commercial Register / No .: HRB 15024 HL

Register court: Lübeck Fax: +49 40 736 762 - 90

Email address: rs@osta-trading.com

## 2. Right to information

You have the right to request confirmation from us as to whether your personal data is being processed. If this is the case, you have the right to information about your personal data stored by us in accordance with Art. 15 GDPR. This includes, in particular, information about the processing purposes, the category of personal data, the categories of recipients to whom your data has been or will be disclosed, the planned storage period, the origin of your data, unless it was collected directly from you.

## 3. Right to rectification

You have the right to correct inaccurate or correct data in accordance with Art. 16 GDPR.

## 4. Right to deletion

You have the right to have your data stored by us deleted in accordance with Art. 17 GDPR, unless this is opposed by legal or contractual retention periods or other legal obligations or rights for further storage.

## 5. Right to restriction

You have the right to request a restriction in the processing of your personal data if one of the requirements in Art. 18 Para. 1 lit. a) to d) GDPR is fulfilled:

- If you contest the accuracy of your personal data for a period of time that enables the person responsible to check the accuracy of the personal data;
- the processing is unlawful, and you refuse to delete the personal data and instead request that the use of the personal data be restricted;
- the controller no longer needs the personal data for the purposes of processing, but you need them to assert, exercise or defend legal claims, or
- if you have objected to processing in accordance with Art. 21 Para. 1 GDPR and it is not yet certain whether the controller's legitimate reasons outweigh your reasons.

## 6. Right to data portability

You have the right to data portability according to Art. 20 GDPR, which means that you can receive the personal data we have stored about you in a structured, common and machine-readable format or you can request the transfer to another person responsible.

## 7. Right to complain

You have the right to lodge a complaint with a supervisory authority. As a rule, you can contact the supervisory authority, in particular in the Member State of your residence, your place of work or the place of the alleged violation.

## Data Security

We have taken appropriate technical and organizational security measures to protect all personal data that are transmitted to us and to ensure that we, as well as our external service providers, comply with data protection regulations. That is why, among other things, all data is encrypted between your browser and our server via a secure SSL connection.

As of January 1, 2021