

Data Protection Declaration

We welcome you on our web pages and appreciate your interest. The protection of your personal data is very important to us. Therefore, we conduct our activities in accordance with applicable personal data protection and data security legislation. Therefore, we act in accordance with the laws concerning personal data and data security. We would like to inform you below which data of your visit is used for which purpose.

Responsible body for processing according to GDPR

The person responsible for privacy policy within the meaning of the General Data Protection Regulation and other data protection laws in the member states of the European Union and other provisions of a data protection nature is:

CirComp GmbH

Marie-Curie-Straße 11

67661 Kaiserslautern

Deutschland

Tel +49 6301 7152-0

Fax +49 6301 7152-20

ksn.info@albint.com

Data Protection Officer

The Data Protection Officer

CirComp GmbH

Marie-Curie-Str. 11

67661 Kaiserslautern

Germany

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ksn.datenschutzbeauftragter@albint.com

1. What is personal data?

The concept of personal data is defined in the Bundesdatenschutzgesetz and in the EU GDPR. Accordingly, these are individual details about personal or material circumstances of

a specific or identifiable natural person. This includes, for example, your civil name, your address, your telephone number or your date of birth.

2. Scope of anonymous data collection and data processing

Unless otherwise stated in the following sections, no personal data is collected, processed or used when using our websites. However, we find out through the use of analysis and tracking tools certain technical information based on the data transmitted by your browser (for example, browser type/version, operating system used, our visited websites including length of stay, previously visited website). We only evaluate this information for statistical purposes.

3. Legal basis for the processing of personal data

Insofar as we obtain the consent of the data subject for processing of personal data, Art. 6 para. 1 lit. a EU General Data Protection Regulation (GDPR) serves as the legal basis for the processing of personal data.

In the processing of personal data necessary for the performance of a contract to which the data subject is a part of, art. 6 para. 1 lit. b GDPR serves as the legal basis. This also applies to processing operations required to carry out precontractual actions.

Insofar as processing of personal data is required to fulfill a legal obligation that is subject to our company, art. 6 para. 1 lit. c GDPR serves as the legal basis.

In the event that vital interests of the data subject or another natural person require the processing of personal data, art. 6 para. 1 lit. d GDPR serves as the legal basis.

If processing is necessary to safeguard the legitimate interests of our company or a third party, and if the interests, fundamental rights and fundamental freedoms of the person concerned do not outweigh the former interest, art. 6 para. 1 lit. f GDPR serves as the legal basis for processing.

4. Use of cookies

The websites of the CirComp GmbH use cookies. Cookies are data stored by the Internet browser on the user's computer system. The cookies can be transmitted to a page when they are accessed and thus allow an assignment of the user. Cookies help to simplify the use of websites for users.

It is always possible to turn off the setting of cookies by changing the option in the Internet browser. The Cookies set can be deleted. It should be noted that disabling cookies may not fully exploit all features of our website. The data of the users collected in this way are pseudonymized by technical precautions. Therefore, an assignment of the data to the calling user is no longer possible. The data will not be stored together with other personal data of the users.

When accessing our website, users are informed by an information banner about the use of cookies for analysis purposes and referred to this privacy policy. In this context, there is also an indication of how the storage of cookies in the browser settings can be prevented.

The legal basis for the processing of personal data using technically necessary cookies is article 6 (1) lit. f GDPR. The legal basis for the processing of personal data using cookies for analysis purposes is provided after the user has consented to this art. 6 para. 1 lit. a GDPR.

5. Creation of log files

Each time the website is accessed, the CirComp GmbH records data and information through an automated system. These are stored in the log files of the server. The data is also stored in the log files of our system. A storage of this data together with other personal data of the user does not take place.

The following data can be collected here:

- (1) Information about the browser type and version used
- (2) The operating system of the user
- (3) The Internet service provider of the user
- (4) The IP address of the user
- (5) Date and time of access
- (6) Websites from which the system of the user reaches our website (referrer)
- (7) Web pages accessed by the user's system through our website

6. Ways to contact

On the websites of the CirComp GmbH, the contact via the provided e-mail address is possible. If the data subject contacts the controller through this channel, the personal data transmitted by the data subject will be automatically stored. The storage serves solely for purposes of processing or contacting the person concerned. A transfer of data to third parties does not take place. Legal basis for the processing of the data is in the presence of the consent of the user art. 6 para. 1 lit. a GDPR.

The legal basis for the processing of the data transmitted in the course of sending an e-mail is article 6 (1) lit. f GDPR. If the e-mail contact aims to conclude a contract, then additional legal basis for the processing is art. 6 para. 1 lit. b GDPR.

The data will be deleted as soon as it is no longer necessary for the purpose of its collection. For the personal sent by e-mail, this is the case when the respective conversation with the user has ended. The conversation is ended when it can be inferred from the circumstances that the relevant facts have been finally clarified.

7. Routine deletion and blocking of personal data

The controller will only process and store personal data of the data subject for as long as necessary to achieve the purpose of the storage. In addition, such storage may take place if provided for by the European or national legislator in EU regulations, laws or other regulations to which the person responsible for processing is subject.

As soon as the storage purpose is removed or a storage period prescribed by the aforementioned regulations expires, the personal data is routinely blocked or deleted.

8. Rights of the data subject

If your personal data has been processed, you are affected in the sense of the GDPR and you have the following rights to the responsible person:

8.1 Right of access

You may ask the person in charge to confirm if personal data concerning you is processed by us.

If such processing is available, you can request information from the person responsible about the following information:

- a. the purposes for which the personal data are processed;
- b. the categories of personal data that are processed;
- c. the recipients or the categories of recipients to whom the personal data relating to you have been disclosed or are still being disclosed;
- d. the planned duration of the storage of your personal data or criteria for determining the duration of storage if specific information is not available;
- e. the existence of a right to rectification or deletion of personal data concerning you, a right to restriction of processing by the controller or a right to object to such processing;
- f. the existence of a right of appeal to a supervisory authority;
- g. all available information about the source of the data if the personal data are not collected from the data subject;
- h. the existence of automated decision-making including profiling under article 22 (1) and (4) GDPR and - at least in these cases - meaningful information about the logic involved and the scope and intended impact of such processing on the data subject.

You have the right to request information about whether the personal data relating to you is transferred to a third country or to an international organization. In this connection, you can request the appropriate guarantees in accordance with art. 46 GDPR in connection with the transmission of information.

8.2 Right of information

You have a right to rectification and/or completion vis-à-vis the controller, insofar as the processed personal data concerning you are inaccurate or incomplete. The controller shall carry out the rectification without undue delay.

8.3 Right to restriction of processing

You may request the restriction of the processing of your personal data under the following conditions:

- a. if you contest the accuracy of your personal data for a period enabling the controller to verify the accuracy of the personal data;
- b. the processing is unlawful and you object to the erasure of the personal data and request instead the restriction of the use of the personal data;
- c. the controller no longer needs the personal data for the purposes of processing, but you need it for the assertion, exercise or defense of legal claims; or
- d. if you have objected to the processing pursuant to Article 21 (1) **GDPR** and it is not yet clear whether the legitimate grounds of the controller outweigh your grounds.

If the processing of your personal data has been restricted, such data may - apart from being stored - only be processed with your consent or for the assertion, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or a Member State.

If the restriction of processing has been restricted in accordance with the above conditions, you will be informed by the controller before the restriction is lifted.

8.4 Right to deletion

8.4.1 You may request the Controller to delete your personal data without undue delay, and the Controller is obliged to delete such data without undue delay, if one of the following reasons applies:

- a. The personal data concerning you are no longer necessary for the purposes for which they were collected or otherwise processed.
- b. You revoke your consent on which the processing was based pursuant to Art. 6 (1) a or Art. 9 (2) a) GDPR and there is no other legal basis for the processing.
- c. You object to the processing pursuant to Art. 21 (1) GDPR and there are no overriding legitimate grounds for the processing, or the You object to the processing pursuant to Art. 21 (2) GDPR.
- d. The personal data concerning you has been processed unlawfully.
- e. The erasure of the personal data concerning you is necessary for compliance with a legal obligation under Union or Member State law to which the controller is subject.
- f. The personal data concerning you has been collected in relation to information society services offered pursuant to Article 8(1) of the GDPR.

8.4.2 If the controller has made your personal data public and is obliged to erase it pursuant to Article 17(1) of the GDPR, it shall take reasonable measures, including technical measures, taking into account the available technology and the cost of implementation, to inform data controllers which process the personal data that you, as the data subject, have requested that they erase all links to or copies or replications of such personal data.

8.4.3 The right to erasure does not exist to the extent that the processing is necessary

- a. for the exercise of the right to freedom of expression and information;
- b. for compliance with a legal obligation which requires processing under Union or Member State law to which the controller is subject, or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- c. for reasons of public interest in the area of public health pursuant to Article 9(2)(h) and (i) and Article 9(3) of the GDPR;
- d. for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes pursuant to Art. 89(1) GDPR, insofar as the right referred to in paragraph 1 is likely to render impossible or seriously prejudice the achievement of the purposes of such processing; or
- e. for the assertion, exercise or defense of legal claims.

8.5 Right to information

If you have asserted the right to rectification, erasure or restriction of processing against the controller, the controller is obliged to notify all recipients to whom the personal data concerning you has been disclosed of this rectification or erasure of the data or restriction of processing, unless this proves impossible or involves a disproportionate effort.

You have the right against the controller to be informed about these recipients.

8.6 Right to data portability

You have the right to receive your personal data that you have provided to the controller in a structured, common and machine-readable format. In addition, you have the right to transfer this data to another controller without hindrance by the controller to whom the personal data was provided, provided that

- a. the processing is based on consent pursuant to Art. 6 (1) a) GDPR or Art. 9 (2) a) GDPR or on a contract pursuant to Art. 6 (1) b) GDPR and
- b. the processing is carried out with the help of automated procedures.

In exercising this right, you also have the right to have your personal data transferred directly from one controller to another controller, insofar as this is technically feasible. Freedoms and rights of other persons must not be affected by this.

The right to data portability does not apply to processing of personal data necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

8.7 Right of objection

You have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data carried out on the basis of Article 6 (1) (e) or (f) GDPR ; this also applies to profiling based on these provisions.

The controller will no longer process your personal data unless it can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

If your personal data is processed for the purpose of direct marketing, you have the right to object at any time to processing of your personal data for such marketing; this also applies to profiling, insofar as it is related to such direct marketing.

If you object to processing for direct marketing purposes, your personal data will no longer be processed for these purposes.

You have the possibility, in connection with the use of information society services - notwithstanding Directive 2002/58/EC - to exercise your right to object by means of automated procedures using technical specifications.

8.8 Right to revoke the declaration of consent under data protection law

You have the right to revoke your declaration of consent under data protection law at any time. The revocation of consent does not affect the lawfulness of the processing carried out on the basis of the consent until the revocation.

8.9 Automated decision in individual cases including profiling

You have the right not to be subject to a decision based solely on automated processing - including profiling - which produces legal effects concerning you or similarly significantly affects you. This does not apply if the decision

- a. is necessary for the conclusion or performance of a contract between you and the controller,
- b. is permitted by legal provisions of the Union or the Member States to which the controller is subject and these legal provisions contain appropriate measures to protect your rights and freedoms as well as your legitimate interests, or
- c. is made with your explicit consent.

However, these decisions may not be based on special categories of personal data pursuant to Article 9(1) of the GDPR, unless Article 9(2)(a) or (g) applies and appropriate measures have been taken to protect the rights and freedoms as well as your legitimate interests.

With regard to the cases mentioned in a. and c., the Controller shall take reasonable steps to safeguard the rights and freedoms as well as your legitimate interests, including at least the right to obtain the intervention of a person on the part of the Controller, to express his or her point of view and to contest the decision.

8.10 Right to complain to a supervisory authority

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your residence, workplace or the place of the alleged infringement, if you consider that the processing of your personal data infringes the GDPR.

The supervisory authority to which the complaint has been lodged shall inform the complainant of the status and outcome of the complaint, including the possibility of a judicial remedy under Article 78 GDPR.

9. Disclosure of data to third parties

9.1 Google Maps

Description and purpose

This website uses Google Maps API to visually display geographical information. When using Google Maps, Google also collects, processes and uses data about the use of the Maps functions by visitors to the websites.

Legal basis

The legal basis for the processing of personal data is the legitimate interest pursuant to Art. 6 para. 1 lit. f) GDPR.

Recipients

The data is usually transferred to a Google server in the USA and stored there.

Transmission to third countries

The data is transferred to a Google server in the USA and stored there. The personal data is transferred on the basis of Art. 46 GDPR. A list of Google's subcontractors used can be found under the following link:

<https://privacy.google.com/businesses/subprocessors/>

Duration of data storage

The data sent by us and linked to cookies, user IDs (e.g. user ID) or advertising IDs are stored by default for 26 months and then automatically deleted.

Possibility of objection

You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website.

Contractual or legal obligation

There is no contractual or legal obligation for the provision of data.

Further data protection information via link

<https://policies.google.com/privacy?hl=de&gl=de>

9.2 Google Fonts

Description and purpose

External fonts, Google Fonts are used on these Internet pages. Google Fonts is a service of Google LLC. ("Google"). The integration of these Web Fonts is done by a server call, usually a Google server in the USA. This transfers to the server which of our Internet pages you have visited. Google also stores the IP address of the browser of the end device of the visitor to these Internet pages. You will find more information in the Google data protection information, which you can download here.

Legal basis

The legal basis for the processing is Art. 6 para. 1 letter f) GDPR. The legitimate interest of the website operators consists in the advantages that the use of Google fonts brings. These include in particular the

1. search engine optimization
2. improved loading times
3. Low administrative effort
4. uniform presentation across devices

Receiver

The recipient is Google LLC. (1600 Amphitheatre Parkway Mountain View, CA 94043, USA).

Transmission to third countries

The data is usually transferred to a Google server in the USA and stored there. The personal data is transmitted on the basis of Art. 46 GDPR

Duration of processing

The data will be deleted as soon as they are no longer necessary for the purpose of their collection. In addition, the data will be deleted if you revoke your consent or request the deletion of your personal data.

Possibility to object

You can prevent participation in this tracking process in a number of ways: a) by adjusting your browser software settings accordingly, in particular by suppressing third-party cookies, which will prevent you from receiving third-party ads; b) by disabling cookies for conversion tracking by setting your browser to block cookies from the domain www.googleadservices.com, <https://www.google.de/settings/ads>, whereby this setting will be deleted if you delete your cookies; c) by disabling interest-based ads from the providers that are part of the self-regulatory campaign "About Ads" via the link <http://www.aboutads.info/choices>, whereby this setting will be deleted if you delete your cookies; d) by permanently disabling cookies in your Firefox, Internet Explorer or Google Chrome browsers via the link <http://www.google.com/settings/ads/plugin>, e) by means of an appropriate cookie setting. We would like to point out that in this case you may not be able to use all functions of this offer to their full extent.

Contractual or legal obligations

The provision of personal data is not required by law or contract and is not necessary for the conclusion of a contract. You are also not obliged to provide the personal data. However, failure to provide it may mean that you are unable to use our website or cannot use it to its full extent.

Further data protection information

You can find further data protection information from Google at

<https://www.google.com/policies/privacy>

Further information on the use of data for marketing purposes by Google: <https://www.google.com/policies/technologies/ads>

Google's terms of use and privacy policy can be found at: <https://www.google.de/intl/de/policies/>

10. Data transmission in third countries

The controller may transfer personal data to a third country. In principle, the controller may provide various appropriate safeguards to ensure that an adequate level of protection is provided for the processing operations. It is possible to transfer data transfers on the basis of an adequacy finding, internal data protection rules, approved codes of conduct, standard data protection clauses or an approved certification mechanism pursuant to Art. 46 para. 2 letters a) - f) GDPR.

If the person responsible undertakes a transfer to a third country on the legal basis of Art. 49 para. 1 a) GDPR, you will be informed at this point about the possible risks of a data transfer to a third country.

There is a risk that the third country receiving your personal data may not provide an equivalent level of protection compared to the protection of personal data in the European Union. This may be the case, for example, if the EU Commission has not issued an adequacy decision for the third country in question or if certain agreements between the European Union and the third country in question are declared invalid. Specifically, there are risks in some third countries with regard to the effective protection of EU fundamental rights through the use of monitoring laws (e.g. USA). In such a case, it is the responsibility of the controller and the recipient to assess whether the rights of data subjects in the third country enjoy a level of protection equivalent to that in the Union and can be effectively enforced.

However, the basic data protection regulation should not undermine the level of protection of natural persons ensured throughout the Union when personal data are transferred from the Union to controllers, processors or other recipients in third countries or to international organisations, even if personal data are further transferred from a third country or from an international organisation to controllers or processors in the same or another third country or to the same or another international organisation.

11. Integration of other services and content of third parties

It may happen that content from third parties, such as videos from YouTube, maps from Google Maps, RSS feeds or graphics from other websites are included in this online offer. This always presupposes that the providers of this content (hereinafter referred to as "third party provider") perceive the IP address of the users. Because without the IP address, they could not send the content to the browser of the respective user. The IP address is therefore required for the presentation of this content. We endeavor to use only content whose respective providers use the IP address solely for the delivery of the content. However, we do not have any influence on this if the third parties provide the IP address e.g. to save for statistical purposes. As far as we know, we will inform users about it.

12. Duration of storage of personal data

Personal data is stored for the duration of the respective legal retention period. After expiry of the deadline, the data will be routinely deleted, unless there is a need for a contract or fulfillment of the contract.

13. Applications (Training & Vacancies)

Description and purpose

CirComp GmbH attaches particular importance to the protection and responsible handling of your personal data. In addition to our general data protection declaration, we would like to inform you here about the processing of your personal data as part of the application process.

If you apply for a specific advertised position, CirComp GmbH is responsible for the use of your personal data. If you have submitted an unsolicited application to CirComp GmbH, we

may consider your personal information for future positions within CirComp GmbH and contact you as a result.

In order to use the application process, personal data such as your name, address, telephone number, e-mail address, date of birth, and information about your qualifications, resume and work history are collected. In addition, you have the option of submitting documents such as certificates and other attachments.

By submitting their application to us, applicants consent to the processing of their data for the purposes of the application process in the manner and to the extent set out in this privacy policy.

Applicants can send us their applications via e-mail. However, please note that e-mails are generally not sent in encrypted form and applicants must ensure encryption themselves. We cannot therefore accept any responsibility for the transmission path of the application between the sender and receipt on our server and therefore recommend rather using an online form or sending by post. This is because instead of applying via the online form and e-mail, applicants still have the option of sending us their application by post.

In the event of a successful application, the data provided by applicants may be processed by us for the purposes of the employment relationship.

Legal basis

CirComp GmbH processes personal data such as name, address, curriculum vitae, certificates, knowledge, skills and other personal and communication data in the context of applications for the purpose of the application process, insofar as these are relevant to the decision regarding the establishment of an employment relationship. The legal basis for this is Article 88 (1) GDPR, Section 26 (1) BDSG and Article 6 (1) b) GDPR.

Insofar as CirComp GmbH processes special categories of personal data within the meaning of Art. 9 (1) GDPR as part of the application process, the legal basis for this processing is Art. 9 (2) (b) GDPR, § 26 (3) and (4) BDSG-neu and/or Art. 9 (2) (a) GDPR, insofar as special categories of personal data are voluntarily disclosed. For applications from minors, the consent of the legal guardian is the legal basis for processing.

Recipients

The data will be passed on to internal recipients at CirComp GmbH. In addition, your personal data will be stored on servers of our parent company Albany International Corp. in the United States, giving Albany International Corp.'s IT administration access to your personal data. In contrast, there are no other recipients at Albany International Corp.

Transfer to third countries

A transfer of your data to a third country, i.e. a country outside the European Economic Area, takes place. Your data is transferred to servers in the USA of our parent company Albany International Corp. and stored there.

As appropriate guarantees, we have agreed EU standard contractual clauses with our parent company Albany International Corp.

Duration of storage

We process your application and thus your personal data contained therein during the ongoing application process. After completion of the application process, including in the event of rejection, we will store your personal data in the form of your application and

documents for up to 6 months and then delete them. This retention period results, among other things, from the regulations of the General Equal Treatment Act (AGG).

Contractual or legal obligation to provide data

You are not obliged to provide us with your data. However, if you do not provide us with your data, it will not be possible for us to include you in the application process. Automated decision-making will not take place. Invoices for any travel expense reimbursement will be archived in accordance with tax law requirements.

The CirComp GmbH reserves all rights to make changes and updates to this Privacy Policy. This Privacy Policy was created in Nov. 2021 by Keyed GmbH.