

## Data collection on the e-learning platform of ITONBOARD

### Who is responsible for data collection on the e-learning platform of ITONBOARD?

Data processing on the e-learning platform of ITONBOARD is carried out by the e-learning platform operator Abstract srl. You can find his contact details here: <https://abstract-technology.com/contact>

### How do we collect your data?

On the one hand, your data is collected by you providing it to us. This can be, for example, data that you enter in a contact form, register form or on your account and profile page.

Other data is collected automatically or after your consent when you visit the e-learning platform by our IT systems. This is mainly technical data (e.g. Internet browser, operating system or time of page view). This data is collected automatically as soon as you enter this e-learning platform.

### What do we use your data for?

Some data is collected to ensure error-free provision of the e-learning platform. Other data may be used to analyze user behavior.

### What rights do you have regarding your data?

You have the right at any time to receive information free of charge about the origin, recipient and purpose of your stored personal data. You also have a right to request the correction or deletion of this data. If you have given your consent to data processing, you can revoke this consent at any time for the future. You also have the right to request the restriction of the processing of your personal data under certain circumstances. Furthermore, you have the right to lodge a complaint with the competent supervisory authority.

For this purpose, as well as for further questions on the subject of data protection, you can contact us at any time.

## Hosting

### Hetzner

We host our e-learning platform with Hetzner. The provider is Hetzner Online GmbH, Industriestr. 25, 91710 Gunzenhausen (hereinafter: Hetzner). For details, please refer to Hetzner's privacy policy: <https://www.hetzner.com/de/rechtliches/datenschutz>. The use of Hetzner is based on Art. 6 para. 1 lit. f DSGVO. We have a legitimate interest in ensuring that our e-learning platform is presented as reliably as possible. Insofar as a corresponding consent has been requested, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a DSGVO and § 25 para. 1 TTDSG, insofar as the consent includes the storage of cookies or access to information in the user's terminal device (e.g. device fingerprinting) as defined by the TTDSG. The consent can be revoked at any time.

### Data processing

We have a data processing agreement (AVV) with the above-mentioned provider. This is a contract required by data protection law, which ensures that the provider only processes the personal data of our

platform visitors in accordance with our instructions and in compliance with the GDPR.

## General notes and mandatory information

### Data protection

The operators of the e-learning platform pages take the protection of your personal data very seriously. We treat your personal data confidentially and in accordance with the statutory data protection regulations and this data protection declaration.

When you use the e-learning platform, various personal data is collected. Personal data is data with which you can be personally identified. This privacy policy explains what data we collect and what we use it for. It also explains how and for what purpose this is done.

We would like to point out that data transmission on the Internet (e.g. when communicating by e-mail) can have security gaps. Complete protection of data against access by third parties is not possible.

### Storage period

Unless a more specific storage period has been stated within this privacy policy, your personal data will remain with us until the purpose for processing the data no longer applies. If you claim a justified request for deletion or revoke your consent to data processing, your data will be deleted unless we have other legally permitted reasons for storing your personal data (e.g. retention periods under tax or commercial law). In the latter case, the data will be deleted once these reasons no longer apply.

### Note on data transfer to the USA and other third countries

Among other things, we use tools from companies based in the USA or other third countries that are not secure under data protection law. If these tools are active, your personal data may be transferred to these third countries and processed there. We would like to point out that no level of data protection comparable to that in the EU can be guaranteed in these countries. For example, US companies are obliged to hand over personal data to security authorities without you as a data subject being able to take legal action against this. It can therefore not be ruled out that US authorities (e.g. intelligence services) process, evaluate and permanently store your data located on US servers for monitoring purposes. We have no influence on these processing activities.

### Revocation of your consent to data processing

Many data processing operations are only possible with your express consent. You can revoke consent you have already given at any time. The legality of the data processing carried out until the revocation remains unaffected by the revocation.

### Right to object to the collection of data in specific cases and to direct marketing (Art. 21 GDPR)

IF THE DATA PROCESSING IS BASED ON ART. 6 ABS. 1 LIT. E OR F DSGVO, YOU HAVE THE RIGHT TO OBJECT TO THE PROCESSING OF YOUR PERSONAL DATA AT ANY TIME FOR REASONS ARISING FROM YOUR PARTICULAR SITUATION; THIS ALSO APPLIES TO PROFILING BASED ON THESE PROVISIONS. THE RESPECTIVE LEGAL BASIS ON WHICH PROCESSING IS BASED CAN BE FOUND IN THIS PRIVACY POLICY. IF YOU OBJECT, WE WILL NO LONGER PROCESS YOUR PERSONAL DATA CONCERNED UNLESS WE CAN DEMONSTRATE COMPELLING LEGITIMATE GROUNDS FOR THE PROCESSING WHICH OVERRIDE YOUR INTERESTS, RIGHTS AND FREEDOMS, OR THE PROCESSING IS FOR THE PURPOSE OF ASSERTING,

EXERCISING OR DEFENDING LEGAL CLAIMS (OBJECTION UNDER ARTICLE 21(1) DSGVO).

IF YOUR PERSONAL DATA ARE PROCESSED FOR THE PURPOSE OF DIRECT MARKETING, YOU HAVE THE RIGHT TO OBJECT AT ANY TIME TO THE PROCESSING OF PERSONAL DATA CONCERNING YOU FOR THE PURPOSE OF SUCH MARKETING; THIS ALSO APPLIES TO PROFILING INsofar AS IT IS RELATED TO SUCH DIRECT MARKETING. IF YOU OBJECT, YOUR PERSONAL DATA WILL SUBSEQUENTLY NO LONGER BE USED FOR THE PURPOSE OF DIRECT MARKETING (OBJECTION PURSUANT TO ARTICLE 21 (2) DSGVO).

### Right of appeal to the competent supervisory authority

In the event of violations of the GDPR, data subjects shall have a right of appeal to a supervisory authority, in particular in the Member State of their habitual residence, their place of work or the place of the alleged violation. The right of appeal is without prejudice to any other administrative or judicial remedy.

### Right to data portability

You have the right to have data that we process automatically on the basis of your consent or in performance of a contract handed over to you or to a third party in a common, machine-readable format. If you request the direct transfer of the data to another responsible party, this will only be done insofar as it is technically feasible.

### SSL or TLS encryption

For security reasons and to protect the transmission of confidential content, such as orders or requests that you send to us as the site operator, this site uses SSL or TLS encryption. You can recognize an encrypted connection by the fact that the address line of the browser changes from "http://" to "https://" and by the lock symbol in your browser line.

If SSL or TLS encryption is activated, the data you transmit to us cannot be read by third parties.

### Information, deletion and correction

Within the framework of the applicable legal provisions, you have the right at any time to free information about your stored personal data, its origin and recipient and the purpose of data processing and, if necessary, a right to correction or deletion of this data. For this purpose, as well as for further questions on the subject of personal data, you can contact us at any time.

## Data collection on this e-learning platform

### Cookies

Our Internet pages use so-called "cookies". Cookies are small text files and do not cause any damage to your terminal device. They are stored either temporarily for the duration of a session (session cookies) or permanently (permanent cookies) on your end device. Session cookies are automatically deleted at the end of your visit. Permanent cookies remain stored on your end device until you delete them yourself or until they are automatically deleted by your web browser.

In some cases, cookies from third-party companies may also be stored on your terminal device when you enter our site (third-party cookies). These enable us or you to use certain services of the third-party company (e.g. cookies for processing payment services).

Cookies have various functions. Many cookies are technically necessary, as certain e-learning platform functions would not work without them (e.g. the shopping cart function or the display of videos). Other cookies are used to evaluate user behavior or display advertising.

Cookies that are necessary to conduct the electronic communication process (necessary cookies) or to provide certain functions desired by you (functional cookies, e.g. for the shopping cart function) or to optimize the e-learning platform (e.g. cookies to measure the web audience) are stored on the basis of Art. 6 (1) lit. f DSGVO, unless another legal basis is specified. The e-learning platform operator has a legitimate interest in storing cookies for the technically error-free and optimized provision of its services. If consent to the storage of cookies has been requested, the storage of the cookies in question is based exclusively on this consent (Art. 6 para. 1 lit. a DSGVO); consent can be revoked at any time.

You can set your browser so that you are informed about the setting of cookies and only allow cookies in individual cases, exclude the acceptance of cookies for certain cases or in general and activate the automatic deletion of cookies when closing the browser. If cookies are deactivated, the functionality of this e-learning platform may be limited.

Insofar as cookies are used by third-party companies or for analysis purposes, we will inform you separately about this within the framework of this data protection declaration and, if necessary, request your consent.

## Server log files

The provider of the pages automatically collects and stores information in so-called server log files, which your browser automatically transmits to us. These are:

- browser type and browser version
- Operating system used
- referrer URL
- Host name of the accessing computer
- Time of the server request
- IP address
- This data is not merged with other data sources.

The collection of this data is based on Art. 6 para. 1 lit. f DSGVO. The e-learning platform operator has a legitimate interest in the technically error-free presentation and optimization of its e-learning platform for this purpose, the server log files must be collected.

## Contact form

If you send us questions or requests via the contact form, your data from entered in the form, including the contact data you provide there, will be stored by us. We do this for the purpose of processing your request and in case of follow-up questions. We do not pass on this data without your consent.

The processing of this data is based on Art. 6 (1) lit. b DSGVO, if your request is related to the performance of a contract or is necessary for the implementation of pre-contractual measures. In all other cases, the processing is based on our legitimate interest in the effective processing of the requests addressed to us (Art. 6 (1) (f) DSGVO) or on your consent (Art. 6 (1) (a) DSGVO) if this has been requested.

The data you enter in the contact form will remain with us until you request us to delete it, revoke your consent to store it, or the purpose for storing the data no longer applies (e.g. after we have completed processing your request). Mandatory legal provisions in particular retention periods remain unaffected.

## Inquiry by e-mail, phone or fax

If you contact us by e-mail, telephone or fax, your inquiry including all resulting personal data (name, inquiry) will be stored and processed by us for the purpose of processing your request. We do not pass on this data without your consent.

The processing of this data is based on Art. 6 (1) lit. b DSGVO, if your request is related to the performance of a contract or is necessary for the implementation of pre-contractual measures. In all other cases, the processing is based on our legitimate interest in the effective processing of the requests sent to us (Art. 6 (1) (f) DSGVO) or on your consent (Art. 6 (1) (a) DSGVO) if this has been requested.

The data you send to us via contact requests will remain with us until you request us to delete it, revoke your consent to store it, or the purpose for storing the data no longer applies (e.g. after your request has been processed). Mandatory legal provisions - in particular legal retention periods - remain unaffected.

## Registration on this e-learning platform

You can register on the e-learning platform to use additional functions on the site. We use the data entered for this purpose only for the purpose of using the respective offer or service for which you have registered. The mandatory information requested during registration must be provided in full. Otherwise we will reject the registration.

For important changes, for example in the scope of the offer or for technically necessary changes, we use the e-mail address provided during registration to inform you in this way.

The data entered during registration is processed for the purpose of implementing the user relationship established by registration and, if necessary, for initiating further contracts (Art. 6 para. 1 lit. b DSGVO).

The data collected during registration will be stored by us as long as you are registered on this e-learning platform and will then be deleted. Legal retention periods remain unaffected.

## Plugins and tools

### YouTube

This e-learning platform embeds videos from the website YouTube. The operator is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

When you visit one of our e-learning platforms on which YouTube is embedded, a connection to the YouTube servers is established. In doing so, the YouTube server is informed which of our pages you have visited. Furthermore, YouTube may store various cookies on your terminal device or use comparable technologies for recognition (e.g. device fingerprinting).

In this way, YouTube can obtain information about visitors to this e-learning platform. This information is used, among other things, to collect video statistics, improve the user experience, and prevent fraud attempts. If you are logged into your YouTube account, you allow YouTube to associate your browsing behavior directly with your personal profile. You can prevent this by logging out of your YouTube account. YouTube is used in the interest of an appealing presentation of our online offers. This

represents a legitimate interest within the meaning of Art. 6 para. 1 lit. f DSGVO.

Insofar as a corresponding consent has been requested, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a DSGVO and § 25 para. 1 TTDSG, insofar as the consent includes the storage of cookies or access to information in the user's terminal device (e.g. device fingerprinting) within the meaning of the TTDSG.

The consent can be revoked at any time. Further information on the handling of user data can be found in YouTube's privacy policy at: <https://policies.google.com/privacy?hl=de>.

## Vimeo

This e-learning platform uses plugins of the video portal Vimeo. The provider is Vimeo Inc, 555 West 18th Street, New York, New York 10011, USA.

When you visit one of our pages equipped with a Vimeo video, a connection to the Vimeo servers is established. In the process, the Vimeo server is informed which of our pages you have visited. In addition, Vimeo obtains your IP address. This also applies if you are not logged in to Vimeo or do not have an account with Vimeo.

The information collected by Vimeo is transmitted to the Vimeo server in the USA. If you are logged into your Vimeo account, you enable Vimeo to assign your surfing behavior directly to your personal profile. You can prevent this by logging out of your Vimeo account. Vimeo uses cookies or comparable recognition technologies (e.g. device fingerprinting) to recognize e-learning platform visitors.

The use of Vimeo is in the interest of an appealing presentation of our online offers. This represents a legitimate interest within the meaning of Art. 6 para. 1 lit. f DSGVO. Insofar as a corresponding consent has been requested, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a DSGVO and § 25 para. 1 TTDSG, insofar as the consent includes the storage of cookies or access to information in the user's terminal device (e.g. device fingerprinting) within the meaning of the TTDSG. The consent can be revoked at any time.

The data transfer to the USA is based on the standard contractual clauses of the EU Commission and, according to Vimeo, on "legitimate business interests". Details can be found here: <https://vimeo.com/privacy>. Further information on the handling of user data can be found in Vimeo's privacy policy at: <https://vimeo.com/privacy>.

## Facebook Plugins (Like & Share Button)

Plugins of the social network Facebook are integrated on this e-learning platform. The provider of this service is Facebook Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland. However, according to Facebook, the data collected is also transferred to the USA and other third countries.

You can recognize the Facebook plugins by the Facebook logo or the "Like button" ("Like") on this e-learning platform. You can find an overview of the Facebook plugins here: [https://developers.facebook.com/docs/plugins/?locale=de\\_DE](https://developers.facebook.com/docs/plugins/?locale=de_DE).

When you visit this e-learning platform, a direct connection is established between your browser and the Facebook server via the plugin. Facebook thereby receives the information that you have visited this e-learning platform with your IP address. If you click the Facebook "Like" button while logged into your

Facebook account, you can link the content of this e-learning platform on your Facebook profile. This allows Facebook to associate your visit to this e-learning platform with your user account. We would like to point out that we, as the provider of the pages, have no knowledge of the content of the transmitted data or its use by Facebook. For more information, please refer to Facebook's privacy policy at: <https://de-de.facebook.com/privacy/explanation> .

If you do not want Facebook to be able to associate your visit to this e-learning platform with your Facebook user account, please log out of your Facebook user account.

The use of Facebook plugins is based on Art. 6 para. 1 lit. f DSGVO. The e-learning platform operator has a legitimate interest in ensuring the greatest possible visibility in social media. Insofar as a corresponding consent was requested, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a DSGVO; the consent can be revoked at any time.

Insofar as personal data is collected on our platform with the help of the tool described here and forwarded to Facebook, we and Facebook Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland are jointly responsible for this data processing (Art. 26 DSGVO). The joint responsibility is limited exclusively to the collection of the data and its forwarding to Facebook. The processing by Facebook that takes place after the onward transfer is not part of the joint responsibility. The obligations incumbent on us jointly have been set out in a joint processing agreement. The text of the agreement can be found at: [https://www.facebook.com/legal/controller\\_addendum](https://www.facebook.com/legal/controller_addendum) . According to this agreement, we are responsible for providing the privacy information when using the Facebook tool and for the privacy-secure implementation of the tool on our e-learning platform. Facebook is responsible for the data security of Facebook products. You can assert data subject rights (e.g., requests for information) regarding data processed by Facebook directly with Facebook. If you assert the data subject rights with us, we are obliged to forward them to Facebook.

The data transfer to the USA is based on the standard contractual clauses of the EU Commission. Details can be found here: [https://www.facebook.com/legal/EU\\_data\\_transfer\\_addendum](https://www.facebook.com/legal/EU_data_transfer_addendum) , <https://de-de.facebook.com/help/566994660333381> and <https://www.facebook.com/policy.php> .

## Twitter plugin

Functions of the Twitter service are integrated on this e-learning platform. These functions are offered by Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07, Ireland. By using Twitter and the "Re-Tweet" function, the e-learning platforms you visit are linked to your Twitter account and made known to other users. In the process, data is also transferred to Twitter. We would like to point out that we, as the provider of the pages, have no knowledge of the content of the transmitted data or its use by Twitter. For more information, please refer to Twitter's privacy policy at: <https://twitter.com/de/privacy> .

The use of the Twitter plugin is based on Art. 6 (1) lit. f DSGVO. The e-learning platform operator has a legitimate interest in ensuring the greatest possible visibility in social media. Insofar as a corresponding consent has been requested, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a DSGVO; the consent can be revoked at any time.

Data transfer to the USA is based on the standard contractual clauses of the EU Commission. Details can be found here: <https://gdpr.twitter.com/en/controller-to-controller-transfers.html> .

You can change your privacy settings on Twitter in the account settings at <https://twitter.com/account/settings> .

## Updates or changes to this privacy policy

We reserve the right to truthfully amend this Privacy Policy from time to time as changes occur. You can find the date of the current version under "Last modified on". Your continued use of the platform following the posting of such changes on our e-learning platform will constitute your consent to such changes to the Privacy Policy and will be deemed to be your agreement to be bound by the amended terms.

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