

## Data protection information for online meetings, telephone conferences and webinars via "Zoom" from Utimaco Group

### Responsible

The "controller" within the meaning of the General Data Protection Regulation (hereinafter: "GDPR") and other data protection provisions is:

#### Utimaco Management GmbH

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52080 Aachen  
Germany

#### Utimaco GmbH

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52080 Aachen  
Germany

#### Utimaco TS UK Limited

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Suite 1, 3rd Floor  
London, SW1Y 4 LB  
UK

#### Utimaco IS GmbH

Germanusstraße 4  
52080 Aachen  
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#### Utimaco TS GmbH

Germanusstraße 4  
52080 Aachen  
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#### Utimaco TS SRL

Via Luigi Einaudi, 41/C  
20020 Arese (MI)  
Italy

- hereinafter referred to collectively as the "**Utimaco Group**" or "**we**" -

We would like to inform you in the following about the processing of personal data in connection with the use of communication tool "**Zoom**".

**Note:** If you call up the Internet site of "Zoom", the provider of "Zoom", the Zoom Video Communications, Inc. located in the USA (hereinafter: "**Provider**"), is responsible for data processing. However, calling up the Internet page of the Provider is only necessary for the use of "Zoom" in order to download the software for the use of "Zoom".

You can also use "Zoom" if you enter the respective meeting ID and, if necessary, additional access data for the meeting directly in the "Zoom" app of the Provider.

If you do not want to or cannot use the "Zoom" app, the basic functions can also be used with a browser version, which you can also find on the "Zoom" website of the Provider.

### Purpose of the processing

We use the "Zoom" tool to conduct telephone conferences, online meetings, video conferences and/or webinars (hereinafter: "**Online Meeting(s)**").

## What data is processed?

When using "Zoom", different types of data are processed. The extent of the data also depends on which data you provide before or during participation in an Online Meeting.

The following personal data are subject to processing:

**User details:** first name, last name, telephone (optional), e-mail address, password (if "Single-Sign-On" is not used), profile picture (optional), Department (optional).

**Meeting metadata:** Topic, description (optional), participant IP addresses, de-vice/hardware information.

**For recordings (optional):** MP4 file of all video, audio and presentation recordings, M4A file of all audio recordings, text file of online meeting chat.

**When dialing in with the telephone:** information on incoming and outgoing telephone number, country name, start and end time. If necessary, further connection data such as the IP address of the device can be saved.

**Text, audio and video data:** You may have the opportunity to use the chat, question or survey functions in an Online Meeting. To the extent that the text entries you make are processed in order to display them in the Online Meeting and, if necessary, to log them. In order to enable the display of video and the playback of audio, the data from the microphone of your terminal device and from any video camera of the terminal device will be processed accordingly for the duration of the meeting. You can switch off or mute the camera or microphone yourself at any time using the "Zoom" applications.

In order to participate in an Online Meeting, you must at least provide information about your first name and last name to enter the "meeting room".

## Scope of processing

We use "Zoom" to conduct Online Meetings. We as the host of the Online Meeting can record the Online Meeting. If we want to record Online Meetings, we will inform you in advance in a transparent manner and - if necessary - ask for your consent. The fact of the recording will also be displayed in the top left of the "Zoom" app.

The respective participants can download the chat content before leaving the Online Meeting. If necessary for the purposes of logging the results of an Online Meeting, we will log the chat content. However, this will usually not be the case.

In the case of webinars, we can also process the questions asked by webinar participants for the purposes of follow-up of webinars.

If you are registered as a user at "Zoom", reports on Online Meetings (meeting metadata, phone dial-up data, questions and answers in webinars, surveys generated in webinars) can be stored for up to one month and be downloaded by the user at "Zoom".

The possibility of software-based "attention monitoring" ("attention tracking") in online meeting tools such as "Zoom" is **deactivated**.

Automated decision-making within the meaning of Art. 22 GDPR is not used.

## Legal basis of the data processing

For employees of Utimaco Group, § 26 of the Federal Data Protection Act (hereinafter: "**BDSG**") is the legal basis for data processing. According to § 26 BDSG, the processing of personal data may be conducted out in order to perform the employment relationship. If necessary, we process your data beyond what is required for the actual performance of the employment relationship in order to safeguard our legitimate interests or those of third parties unless these are overridden by your interests or fundamental rights and freedoms which require the protection of your personal data (Article 6 (1) (f) of the GDPR). In these cases, we are interested in the effective implementation of Online Meetings. Further details can be found in the Privacy Policy for Employees of the Utimaco Group.

For other participants in Online Meetings - insofar as the meetings are held within the framework of contractual relationships - Article. 6 (1) (b) of the GDPR is the legal basis for data processing. If no contractual relationship exists, the legal basis is Article. 6 (1) (f) GDPR. Here too, we are interested in the effective implementation of Online Meetings.

## Receiver / transfer of data

Personal data processed in connection with participation in Online Meetings is generally not passed on to third parties, unless it is specifically intended to be passed on. Please note that content from Online Meetings as well as personal meetings are often used to communicate information with customers, interested parties or third parties and are therefore intended for disclosure.

Other recipients: The Provider necessarily obtains knowledge of the above-mentioned data to the extent that this is provided for in our contract processing agreement with the Provider.

## Data processing outside the European Union

"Zoom" is a service provided by the Provider from the USA. Processing of personal data therefore also takes place in a third country. We have concluded an order processing contract with the Provider which meets the requirements of Article 28 of the GDPR.

An adequate level of data protection is guaranteed on the one hand by the "Privacy Shield" certification of the Provider, but also by the conclusion of the so-called EU standard contract clauses.

## Technical and organisational security measures

The Utimaco group established technical and organisational security measures for the use of "Zoom" which should be followed by you as well (as applicable). These include in particular the following:

- Mandatory password use for Online Meetings.
- Use of the "waiting room" option to ensure that only those participants enter the Online Meeting who have been invited.
- Timely installation of Update made available by Zoom.
- Do not share your Online Meeting ID with anyone.
- Disabled screen sharing for the Online Meeting participants.
- Closure of the Online Meeting when all participants are logged in.
- No posting of images from the Online Meeting.
- No publication of the Online Meeting link.

## Data Protection Officer and Data Protection Coordinator

We have appointed a Data Protection Officer and a Data Protection Coordinator. You can reach Data Protection Coordinator as follows:

Utimaco Management GmbH  
– Data Protection Coordinator –  
Germanusstraße 4  
52080 Aachen  
Germany  
E-mail: [dataprotection@utimaco.com](mailto:dataprotection@utimaco.com)

## Your rights as a data subject

You have the right to receive free of charge **access** to personal data concerning you (Article 15 of the GDPR). In the case of a request for information that is not made in writing, we ask for your understanding that we may require you to provide evidence that proves that you are the person you claim to be. The restrictions pursuant to § 34 BDSG apply.

You have the right to **correction** or **deletion** or **restriction of processing** to the extent applicable by law.

In addition, you have the right to **object** to the processing of your personal data. For further Information about this, please refer to the section "Information on your right to object pursuant to Article 21 of the GDPR below.

There is also a right to **data transferability** within the framework of data protection regulations according to Article 20 of the GDPR. You have right to receive your data from us in a structured, commonly used and machine-readable format. We are not permitted to prevent you having your data transferred to another controller.

## Deletion of data

As a matter of principle, we delete personal data when there is no need for further storage. A requirement can exist in particular if the data is still needed to fulfil contractual services, to check and grant or avert warranty and, if applicable, guarantee claims. In the case of statutory storage obligations, deletion shall only be considered after the expiry of the respective storage obligation.

## Right of appeal to a supervisory authority

You have the right to complain about the processing of personal data by us to a data protection supervisory authority. You will find the details of the supervisory authority competent for us at the end of this privacy policy.

## Amendment of this privacy statement

We revise this privacy policy in the event of changes in data processing or other occasions that make this necessary. You will always find the current version on our website or it will be handed out upon your request.

## Information on your right to object pursuant to Article 21 of the GDPR

### Right to object in a particular case

You have the right to object, on grounds relating to your particular situation, at any time, to processing of personal data which is based on Article 6 (1) (f) of the GDPR.

Where you exercise your right to object, we will then cease to process your personal data unless we can demonstrate compelling legitimate reasons for such processing that outweigh your interests, rights and freedoms, or where such processing serves to establish, exercise or defend legal claims.

You may exercise your right to object informally by notifying the Utimaco Group's Data Protection Coordinator whose contact details are shown at the end of this Privacy Policy. You should insert "Objection" in the reference line and provide your name, address and date of birth.