



## **Data Protection Policy**

In the following, we inform you about how we collect your personal data when you use our website, what we do with it, for what purposes and on what legal basis this is done, and what rights and claims you are entitled to as a result.

Personal data is any data that can be attributed to you personally, e.g. your name, address, e-mail addresses or user behaviour. If we use an appointed service provider to fulfil individual functions of our offering, or if we want to use your data for commercial purposes, we will tell you in detail about the processes involved.

### **1. Name and contact details of the controller responsible for processing**

The controller within the meaning of Article 4(7) of the EU General Data Protection Regulation (GDPR) is H. + H. Maslanka Chirurgische Instrumente GmbH, Stockacher Strasse 172, 78532 Tuttlingen, Germany, e-mail:info@maslanka.de, Tel: +49 (0)7461-4732, (see our Legal Information).

### **2. Collection and storage of personal data and the nature and purpose of its use**

#### **a) When visiting the website**

When you visit our website, the browser you use on your device automatically sends information to us. If you visit our website, the following data will be collected without any input from you:

- IP address
- Date and time of your request
- Content of the request (specific page)
- Access status/HTTP status code
- Volume of data transferred
- Website generating the request
- Browser used
- Language and version of the browser software
- Operating system and its interface

We process this data for the following purposes:

- To ensure a smooth connection with the website
- To ensure convenient use of our website
- To evaluate system security and stability
- For other administrative purposes

The legal basis for the data processing is set out in Article 6(1)(1)(f) of the GDPR. Our justified interest arises from the purposes of data collection set out above. Under no circumstances will we use the data listed above for the purpose of drawing conclusions regarding your identity.

When you visit our website, we also set cookies and use analytical services. Further explanations of cookies and analytical services can be found under sections 4 and 5 of this data protection policy.

#### **b) When you use our contact form**

When you contact us using a contact form or by e-mail, the data you share with us (e-mail address, name, telephone number, address, institution and any information specified by you in the contact form) is saved by us to enable us to reply to your enquiries.

Data processing for the purposes of contacting us is carried out in accordance with Article 6(1)(1)(a) GDPR based on your consent, which is given voluntarily.

We delete the data created in this context once it no longer needs to be stored, or restrict its further processing if there are legal requirements for us to store it.

#### **c) If you submit an application**

Should you submit an online application to us, we will save and process your name, e-mail address, message and your application documents (letter of application, CV, references, certificates etc.) for the purpose of completing the recruitment process. The legal basis for this is Article 6(1)(1)(a) GDPR.

We ensure that your personal application details are only passed on to the internal departments and specialist divisions that are responsible for the appointment of the specific post. Your personal application data is not passed on to third parties. If we are unable to consider you within the recruitment process, your application data will be deleted automatically four months after the closing date for the position, provided there are no legal

reasons requiring us to do otherwise, or the data has to be stored for the purposes of providing proof or if you have expressly consented to the data be stored for longer.

#### **d) When you register for our newsletter**

With your consent, you can subscribe to our newsletter, with which we will keep you up to date on the latest information about our instruments and interesting offers from H. + H. Maslanka Chirurgische Instrumente GmbH.

We use the double opt-in method to process subscriptions to our newsletter. This means that, after your registration, we send an e-mail to your specified e-mail address in which we ask you to confirm that you would like to receive our newsletter. If you do not confirm your registration within seven days, your information will be automatically deleted. We also store the IP addresses and times of your registration and confirmation. The purpose of this is to prove your registration and if necessary be able to investigate any potential misuse of your personal data. After your registration, we will save your e-mail address and any other information that you share with us as part of the newsletter registration process, for the purposes of sending the newsletter to you.

This data processing takes place on the basis of the legislation set out in Article 6(1)(1)(a) GDPR.

You can revoke your consent to the sending of the newsletter and unsubscribe from it at any time. You can communicate your withdrawal of consent by clicking on the link included in every newsletter e-mail, by e-mailing [info@maslanka.de](mailto:info@maslanka.de) or by sending a message to the contact details set out in the Legal Information.

#### **e) General notice**

You are under no legal or contractual obligation to provide us with your personal data.

### **3. Sharing of data**

Your personal data will only be shared with third parties if this is specifically stated in the data protection policy or occurs for one of the following purposes:

- You have provided your express consent in accordance with Article 6(1)(1)(a) GDPR

- Your data is shared in accordance with Article 6(1)(1)(f) GDPR in order to enforce, exercise or defend legal claims and there is no reason to assume that you have any overriding interest in your data not being shared
- If a legal requirement exists to share the data pursuant to Article 6(1)(1)(c) GDPR
- The sharing of data is legally permissible and required for the processing of a contractual relationship with you in accordance with Article 6(1)(1)(b) GDPR

We transmit personal data of the user to service providers in countries outside the EU/EEA in the following context: USA (see section 5 and section 6).

#### **4. Cookies**

We use cookies on our website. Cookies are small text files that are stored on your hard drive and associated with the browser you are using, and which allow us to receive certain information. This does not mean, however, that we are able to deduce your identity directly.

Cookies are used partly to make your use of our website more enjoyable for you. We use session cookies to detect that you have already visited one or more pages on our website. These are automatically deleted when you close your browser.

We also use temporary cookies to optimise the site's user-friendliness, and these are stored for a defined period of time on your device. If you visit our website again to avail yourselves of our services, we automatically recognise that you have already visited us and which entries and settings you have made (e.g. the language you have selected) so that you do not need to do this again.

We also use cookies to statistically evaluate the use of our website and analyse this use for the purposes of optimising our services to you (see section 5 of this data protection policy). These cookies allow us, when you visit our website again, to automatically recognise that you have already been here before. These cookies are automatically deleted after a defined period.

The data processed via cookies is required for the purposes specified in order to maintain our justified interests and the interests of third parties in accordance with Article 6(1)(1)(f) GDPR.

You can configure your browser settings in accordance with your preferences and reject the acceptance of third party cookies or all cookies, for example. We do point out, however, that if you reject cookies you may not be able to use all the features of this website and/or your user experience may be limited.

The legal basis for the use of cookies is set out in Article 6(1)(1)(f) GDPR.

## **5. Use of Google Analytics**

Insofar as you have given your consent, Google Analytics, a web analytics service provided by Google LLC, is used on this website. The responsible service provider in the EU is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("Google"). By using Google Analytics, we want to ensure the needs-appropriate design and ongoing optimisation of our website and to statistically document the use of our website in order to optimise our services to you.

Google Analytics uses "cookies", text files that are stored on your computer and which permit an analysis of your use of the website. This website uses session cookies only. These are automatically deleted when you close your browser. Pseudonymised usage profiles can be created and evaluated from the collected data for the aforementioned purposes. The information generated by the cookie about your use of this website is generally transmitted to a Google server in the USA and stored there. If IP anonymisation is enabled on this website, Google first truncates your IP address within the Member States of the European Union or in other states of the European Economic Area Agreement. The full IP address is only communicated in full to a Google server in the USA in exceptional cases and truncated there. On behalf of the operator of this website, Google will use this information to evaluate your use of the website, to compile reports about website activities and to provide to the website operator other services associated with website use and internet use.

Google Analytics cookies are only set with your expressly declared consent. Once you have declared your consent, you can revoke it at any time with effect for the future free of charge by sending an e-mail to [info@maslanka.de](mailto:info@maslanka.de) or by sending a message to the contact details given in the Legal Information.

The legal basis for the use of cookies is Article 6(1)(1)(a) GDPR if you have consented to their use, and otherwise Article 6(1)(1)(f) GDPR.

You can also prevent the installation of cookies by selecting the appropriate settings in your browser software; we do point out, however, that by doing so you may be unable to use the full functionality of this website. You can also prevent any data generated by the cookies or data relating to your use of this website (including your IP address) from being transferred to Google or being processed by Google by downloading and installing the browser plug-in available via the following link: [tools.google.com/dlpage/gaoptout](https://tools.google.com/dlpage/gaoptout).

This website uses Google Analytics with the "`_anonymizeIp()`" extension. This means that IP addresses are processed in truncated form, preventing any associations from being made with actual people. If the data collected about you allows any information to be deduced about your identity, this data is immediately rejected and the personal data is immediately deleted.

The IP address transmitted by your browser as part of Google Analytics will not be merged by Google with other data.

We use Google Analytics to be able to analyse the use of our website and regularly improve it. The statistical information we obtain from this allows us to improve our services and make them more interesting for you as a user. For the exceptional cases in which personal data is transferred to the USA, Google complies with legal frameworks (standard contractual clauses of the European Commission) that ensure a level of protection equivalent to that under EU law (<https://policies.google.com/pri-vacy/frameworks?hl=de>).

Information regarding third-party provider: Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 1 686 5660.

Terms of use: [www.google.com/analytics/terms/de.html](https://www.google.com/analytics/terms/de.html),  
overview of data protection for Google-Analytics: <https://support.google.com/analytics/answer/6004245>, and the privacy policy: [www.google.de/intl/de/policies/privacy](https://www.google.de/intl/de/policies/privacy).

## **6. Use of Google Maps**

This website uses the Google Maps service from Google Inc. ("Google"). This allows us to show you interactive maps directly on the website, allowing you convenient use of the Maps function. The legal basis for this is set out in Article 6(1)(1)(f) GDPR.

By visiting the website, Google receives the information that you have accessed the respective sub-page of our website. The data specified in section 2 lit. a) of this policy is also transferred to Google. This occurs regardless of whether Google provides a user account via which you are logged in, or whether no user account exists. If you are logged in to Google, your data will be assigned directly to your account. If you do not wish this association with your profile on Google, you must log out before visiting our website. Google saves your data as a user profile and uses it for the purposes of advertising, market research and/or the needs-led design of its website. This type of evaluation takes place in particular (even for users who are not logged in) to deliver needs-led advertising. You have the right to refuse the creation of these user profiles, although you must contact Google to exercise this right.

Further information regarding the purpose and scope of the data collected and its processing by Google can be found in Google's data protection policies. You will also find information there regarding your rights in this regard and setting options for protecting your privacy: [www.google.de/intl/de/policies/privacy](http://www.google.de/intl/de/policies/privacy). Google also processes your personal data in the U.S. and complies with legal frameworks (European Commission standard contractual clauses) that ensure a level of protection equivalent to EU law (<https://policies.google.com/privacy/frame-works?hl=de>).

## **7. Your rights**

You have the right:

- according to Article 15 GDPR to request information from us regarding the personal data we process about you. In particular, you can request information regarding the reasons for processing, the category of personal data, the categories of recipients with whom your data was or is being shared, the planned duration of storage, the existence of any right of correction, deletion, restriction of processing or refusal, the existence of the right to complain, the origin of your data if this has not been collected by us, and regarding the existence of any automated decision-making, including profiling and, where relevant, pertinent information regarding its individual details
- according to Article 16 GDPR to immediately request the correction of incorrect or completion of any personal data we have stored about you
- according to Article 17 GDPR to request the deletion of any personal data we have stored about you unless the processing of this data is required to exercise the right



to freedom of expression and information, to fulfil legal obligations arising from reasons of public interest or for the enforcement, exercising or defence of legal claims

- according to Article 18 GDPR to request restriction of the processing of your personal data where you dispute the correctness of that data, the processing is unlawful but you oppose the deletion of the personal data and we no longer require the data, however you need this to enforce, exercise or defend legal claims or, in accordance with Article 21 GDPR, you have lodged an objection to its processing
- according to Article 20 GDPR to request that the personal data you have provided to us is received in a structured, accessible and machine-readable format or transferred to another controller
- according to Article 7(3) GDPR to revoke your consent, once given, at any time. This has the result that the data processing based on this consent will no longer be permitted to continue in future.

To exercise the above rights, please send an e-mail to [info@maslanka.de](mailto:info@maslanka.de) or send us a message via the contact details set out in the Legal Information.

### **Right of objection**

If we process your personal data to protect legitimate interests according to Article 6(1)(1)(f) GDPR, you have the right according to Article 21(1) GDPR to object to this processing on grounds arising from your particular situation. You may object to the processing of your data for direct marketing purposes at any time without giving reasons pursuant to Article 21(2) GDPR. To exercise your right of objection, it is sufficient to send us an informal message, e.g. by e-mail to [info@maslanka.de](mailto:info@maslanka.de).

### **Right of complaint**

If you believe that the processing of personal data concerning you violates the General Data Protection Regulation, you have the right according to Article 77 GDPR to lodge a complaint with a data protection supervisory authority.



## **8. Data security**

To protect the security of your data during transmission, we use state-of-the-art encryption procedures. We also use appropriate technical and organisational security measures to protect your data against accidental or intentional manipulation, partial or complete loss, destruction or against unauthorised access by third parties. Our security measures are continuously improved in accordance with technological development. We cannot, however, guarantee the security of the data transmitted by you as a user. Any data transmission originating from the user is therefore at their own risk.

## **9. Updating and changes to this data protection policy**

This data protection policy is currently valid and was last updated in October 2022.

Through the further development of our website and services, or for reasons of changing legal or authority-related specifications, it may be necessary to alter this data protection policy. The respective current data protection policy can always be viewed on the website at <http://www.maslanka.de/footer/datenschutz> and printed out from there.