

Privacy policy in accordance with the GDPR

I. Name and address of the controller

The controller in the sense of the General Data Protection Regulation and other national data protection acts of the Member States, as well as other data protection legislation, is:

TLG HH1 GmbH & Co. KG
c/o TLG IMMOBILIEN AG
Hausvogteiplatz 12
10117 Berlin
Germany
Tel.: +49 (0)30 2470 50
Email: kontakt@tlg.de
Website: www.wcm.de

II. Name and address of the data protection officer

The data protection officer of the controller is:

TLG HH1 GmbH & Co. KG
c/o TLG IMMOBILIEN AG
Torsten Berndsen
Hausvogteiplatz. 12
10117 Berlin
Germany
Email: datenschutz@tlg.de

III. General information on data processing

1. Scope of the processing of personal data

Generally speaking, we only collect and use the personal data of our users in so far as necessary to provide a functional website as well as our content and services. As a rule,

the personal data of our users are only collected and used with the consent of the user. This does not apply to cases in which prior consent cannot be obtained for practical reasons and the processing of the data is permitted by statutory provisions.

2. Legal grounds for the processing of personal data

When we obtain the consent of a data subject to the processing of personal data, Article 6 (1a) of the European General Data Protection Regulation (GDPR) serves as legal grounds for the processing of personal data. Article 6 (1b) GDPR serves as legal grounds for the processing of personal data where the processing is necessary for the performance of a contract to which the data subject is party. This also applies to data processing that is necessary to take steps prior to entering into a contract. Article 6 (1c) GDPR serves as legal grounds for the processing of personal data where processing is necessary for compliance with a legal obligation to which our company is subject. Article 6 (1d) GDPR serves as legal grounds if processing is necessary in order to protect the vital interests of the data subject or of another natural person. Article 6 (1f) GDPR serves as legal grounds where processing is necessary for the purposes of the legitimate interests pursued by our company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject.

3. Erasure of data and duration of storage

The personal data of the data subject will be erased or blocked as soon as the purpose for which they were stored has been achieved. Data can only be stored beyond this point if provided for by European or national legislation in European regulations, laws or other ordinance to which the controller is subject. The data will then be blocked or erased at the end of a storage period prescribed by these legal standards unless it is necessary to continue storing the data for the conclusion or performance of a contract.

IV. Provision of the website and generation of log files

1. Description and scope of data processing

Whenever you visit our website, our system automatically collects data and information from your computer.

The following data are collected:

- (1) Browser type, including version and add-ons
- (2) Operating system
- (3) Protocols used
- (4) IP address

- (5) Date and time of the visit
- (6) The last website the user was on before ours
- (7) Websites accessed by the system of the user on our website
- (8) The volume of data transferred
- (9) Regional origin and language
- (10) End devices including display resolution
- (11) Traffic source
- (12) Downloaded files
- (13) Visit duration

The data are stored in log files on our system. These data are not stored together with other personal data of the user.

2. Legal grounds for data processing

Article 6 (1f) GDPR serves as the legal grounds for the temporary storage of the data and for the log files.

3. Purpose of data processing

The temporary storage of an IP address by the system is necessary for the purpose of transmitting the website to the computer of the user. The IP address of the user has to remain stored for this purpose. It is stored in log files to guarantee the functionality of the website. Additionally, the data enable us to optimise the website and ensure the security of our IT systems. The data are not evaluated for marketing purposes in this context. The element 'gat._anonymizeIp();' deletes the last eight bits of the IP address of the user and as such, they are not sent to Google. We also have a legitimate interest in data processing for these purposes in accordance with Article 6 (1f) GDPR.

4. Duration of storage

The data are erased as soon as they are no longer necessary for the achievement of the purpose for which they were collected. They can be stored for longer. In this case, the IP addresses of the user will be anonymised in order to prevent them from being associated with the visiting client.

5. Rights to object and erasure

The collection of the data in order to make the website available and the storage of the data in log files is absolutely necessary for the operation of the website. Therefore, the user has no right to object.

V. Use of cookies

1. Description and scope of data processing

Our website uses cookies. Cookies are text files which are stored in or by the Internet browser on the computer of the user. When the user visits a website, a cookie can be installed on the operating system of the user. This cookie contains a distinctive character string that makes it possible to unequivocally identify the browser when it visits the website again. We use cookies to make our website more user-friendly. Some elements of our website require the visiting browser to be identifiable even after a change of page. The cookies therefore store and transmit the following data:

- (1) Browser type, including version and add-ons
- (2) Operating system
- (3) Protocols used
- (4) IP address
- (5) Date and time of the visit
- (6) The last website the user was on before ours
- (7) Websites accessed by the system of the user on our website
- (8) The volume of data transferred
- (9) Regional origin and language
- (10) End devices including display resolution
- (11) Downloaded files
- (12) Visit duration

Additionally, we use cookies on our website to analyse the surfing habits of users. This way, the following data can be transmitted:

- (1) Search terms entered
- (2) Frequency of page visits
- (3) Use of website features
- (4) IP address with the last eight bits deleted

Upon visiting our website, the user will be notified of the use of cookies for analytical purposes and prompted to consent to the processing of personal data used in this context. Additionally, reference is made to this privacy policy in this regard.

2. Legal grounds for data processing

Article 6 (1f) GDPR serves as the legal grounds for the processing of personal data collected by cookies. Article 6 (1f) GDPR serves as the legal grounds for the processing of personal data collected by technically necessary cookies. When consent has been granted, Article 6 (1a) GDPR serves as the legal grounds for the processing of personal data collected by cookies for analytical purposes.

3. Purpose of data processing

Technically necessary cookies are used to simplify the use of the website for the user. Some features of our website cannot be provided without cookies. They require the browser to be identifiable even after a change of page. We require cookies for the following applications:

- (1) Application of language settings
- (2) Noting of search terms

The user data collected by technically necessary cookies will not be used to generate user profiles. The analytical cookies are used to improve the quality of our website and its content. Using the analytical cookies, we find out how the website is used and as such can continuously optimise it. We also have a legitimate interest in processing personal data for these purposes in accordance with Article 6 (1f) GDPR.

4. Duration of storage, rights to object and erasure

Cookies are stored on the computer of the user and transmitted to our website from there. Therefore, as the user, you can full control over the use of cookies. You can change the settings in your browser to deactivate or limit the transfer of cookies. Cookies that are already on your computer can be deleted at any time. This can even be done automatically. If cookies are deactivated for our website, this might result in some of the features of the website not being fully available.

VI. Email correspondence

1. Description and scope of data processing

Our website doesn't feature a contact form. Alternatively, you can contact us at the e-mail address provided. In this case, the personal data of the user that are transmitted along with the e-mail will be stored. In this context, no data are disclosed to third parties. The data will be used exclusively for the purposes of the correspondence.

2. Legal grounds for data processing

When the user has provided consent, Article 6 (1a) GDPR serves as the legal grounds for the processing of data. Article 6 (1f) GDPR serves as the legal grounds for the processing of data transmitted as part of sending an e-mail. If the e-mail correspondence is aimed towards concluding a contract, Article 6 (1b) GDPR serves as additional legal grounds for processing.

3. Purpose of data processing

Processing the personal data only serves to process the correspondence.

4. Duration of storage

The data are erased as soon as they are no longer necessary for the achievement of the purpose for which they were collected. This is the case for the personal data sent by e-mail when the conversation with the user is finished. The conversation will be considered ended when the circumstances imply that the matter in question has been resolved.

5. Rights to object and erasure

The user can revoke his/her consent to the processing of personal data at any time. If the user contacts us by e-mail, he/she can object to the storage of his/her personal data at any time. In this case, the conversation cannot be continued. Withdrawals of consent are to be addressed to datenschutz@tlg.de. In this case, all personal data stored as part of the correspondence will be erased.

VII. Use of analytics services

1. Google Analytics

Our website uses Google Analytics, a web analysis service provided by Google Inc. ('Google'). Google Analytics uses 'cookies'; text files that are stored on your computer and that enable analysis of how you use the website. The information generated by the cookie about your use of this website is normally sent to a Google server in the USA and stored there. As IP anonymisation is active on this website (see section IV. 3.), Google will shorten your IP address in advance and within the Member States of the EU or other signatories to the Treaty on the European Economic Area. Only in exceptional cases will your full IP address be sent to a Google server in the USA and shortened there. Google will use this information on behalf of the operator of this website for the purposes of evaluating your use of the website, compiling reports on website activity for website

operators and providing other services relating to website activity and Internet usage. Your IP address sent by your browser through Google Analytics will not be associated with any other data held by Google. You can prevent the installation of cookies by adjusting the settings of your browser software accordingly. However, we would like to point out that, if you should choose to do so, you might not be able to use all of the features of this website. Additionally, you can prevent Google from collecting or processing the data generated by the cookie concerning your use of our website (including your IP address) by downloading and installing the browser plugin using the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>. In addition to or instead of the browser add-on, you can disable tracking by Google Analytics on our website by clicking this link (`javascript:gaOptout()`). This will install an opt-out cookie on your device. The cookie will prevent Google Analytics from collecting data for this website and this browser for as long as the cookie remains in your browser.

2. eTracker

Additionally, data are collected through our website and stored for the purposes of marketing and optimisation using technology from eTracker GmbH (<https://www.etracker.com>). These data can be used to generate pseudonymised usage profiles. Cookies can be used for this purpose. The cookies make it possible to recognise your Internet browser on subsequent visits. The data collected using eTracker technology will not be used to personally identify visitors to this website and will not be compiled with personal data concerning the bearer of the pseudonym without the express consent of the data subject. You can object to the collection and storage of data at any time with future effect. Please exclude me from eTracker data collection: <https://www.etracker.de/privacy?et=V23Jbb>.

We use eTracker to analyse how our website is used and to improve it regularly. We can use the statistics to improve our website and make it more interesting to you as a user. The collected data are stored permanently, pseudonymised and analysed. Article 6 (1f) GDPR serves as the legal grounds for the use of eTracker.

Information on the third-party provider: eTracker GmbH, Erste Brunnenstraße 1, 20459 Hamburg; <https://www.etracker.com/en/data-privacy/>. Article 6 (1f) GDPR serves as the legal grounds for the use of eTracker.

VIII. Rights of the data subject

If personal data concerning you are processed, you are a data subject in the sense of the GDPR and you have the following rights with regard to the controller:

1. Right to information

You can demand confirmation from the controller whether or not personal data concerning you are being processed by us.

If your data are being processed, you can request the following information from the controller:

- (1) the purpose for which the personal data are being processed;
- (2) the categories of personal data that are being processed;
- (3) the recipients or categories of recipient to which personal data concerning you have been or are being disclosed;
- (4) the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
- (5) the existence of a right to rectify or erase the personal data concerning you, a right to restrict processing by the controller or a right to object to such processing;
- (6) the right to lodge a complaint with a supervisory authority;
- (7) all available information on the origins of the data if the personal data were not obtained from the data subject;
- (8) the existence of automated individual decision-making, including profiling, in the sense of Article 22 (1) and (4) GDPR and – at least in these cases – meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

You are entitled to demand information on whether or not the controller intends to transfer personal data to a recipient in a third country or international organisation. In this context, you can request information on the appropriate safeguards referred to in Article 46 GDPR in connection with the transfer.

3. Right to rectification

You are entitled to obtain from the controller the rectification and/or completion of the personal data concerning you, provided that they are inaccurate or incomplete. The controller must carry out the rectification without undue delay.

4. Right to restriction of processing

Under the following circumstances, you can demand the restriction of the processing of the personal data concerning you:

- (1) if you contest the accuracy of the personal data concerning you for a period enabling the controller to verify the accuracy of the personal data;
- (2) the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- (3) the controller no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims;
- (4) if you have objected to processing pursuant to Article 21 (1) GDPR pending the verification whether the legitimate grounds of the controller override your own.

Where processing of personal data concerning you has been restricted, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defence 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 of a Member State. If processing has been restricted in line with the criteria above, you will be informed by the controller before the restriction of processing is lifted.

5. Right to erasure

a) Duty of erasure

You are entitled to obtain from the controller the erasure of personal data concerning you without undue delay and the controller is obliged to erase personal data without undue delay where one of the following grounds applies:

- (1) The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- (2) You withdraw consent on which the processing is based according to point (a) of Article 6 (1) GDPR or point (a) of Article 9 (2) GDPR, and where there is no other legal ground for the processing.
- (3) You object to the processing pursuant to Article 21 (1) GDPR and there are no overriding legitimate grounds for the processing, or you object to the processing pursuant to Article 21 (2) GDPR.
- (4) The personal data concerning you have been unlawfully processed.

- (5) The personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.
- (6) The personal data have been collected in relation to the offer of information society services referred to in Article 8 (1) GDPR.

b) Notification of third parties

Where the controller has made the personal data concerning you public and is obliged pursuant to Article 17 (1) GDPR to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that you, the data subject, have requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

c) Exceptions

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

- (1) for exercising the right of freedom of expression and information;
- (2) for compliance with a legal obligation which requires processing by 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;
- (3) for reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9 (2) GDPR as well as Article 9 (3) GDPR;
- (4) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89 (1) GDPR in so far as the right referred to in section (a) is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- (5) for the establishment, exercise or defence of legal claims.

6. Right to notification

The controller shall communicate any rectification or erasure of personal data or restriction of processing to which you have exercised your right to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort.

The controller must inform you about those recipients if you request it.

7. Right to data portability

You are entitled to receive the personal data concerning you, which you have provided to a controller, in a structured, commonly used and machine-readable format. Additionally, you have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:

- (1) the processing is based on consent pursuant to point (a) of Article 6 (1) GDPR or point (a) of Article 9 (2) GDPR or on a contract pursuant to point (b) of Article 6 (1) GDPR; and
- (2) the processing is carried out by automated means.

In exercising your right to data portability, you have the right to have the personal data transmitted directly from one controller to another, where technically feasible. This may not adversely affect the rights and freedoms of others.

The right to data portability does not apply to processing 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. Right to object

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on point (e) or (f) of Article 6 (1) GDPR, including profiling based on those provisions.

The controller shall no longer process the personal data concerning you unless the controller demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. Where personal data are processed for direct marketing purposes, you have the right to object at any time to processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where you object to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes. In the context of the use of information society services, and Directive 2002/58/EC notwithstanding, you may exercise your right to object by automated means using technical specifications.

9. Right to withdraw consent

You have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

10. Automated individual decision-making, 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:

- (1) is necessary for entering into, or performance of, a contract between you and the data controller;
- (2) is authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard your rights and freedoms and legitimate interests; or
- (3) is based on your explicit consent.

However, these decisions may not be based on special categories of personal data referred to in Article 9 (1) GDPR, unless point (a) or (g) of Article 9 (2) GDPR applies and suitable measures to safeguard your rights and freedoms and legitimate interests are in place.

In the cases referred to in points (1) and (3), the data controller shall implement suitable measures to safeguard your rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express your point of view and to contest the decision.

11. Right to lodge a complaint with 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 habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the General Data Protection Regulation. The supervisory authority with which the complaint has been lodged shall inform the complainant on the progress and the outcome of the complaint including the possibility of a judicial remedy pursuant to Article 78 GDPR.