

## **Data Protection Notice of C-E (DEUTSCHLAND) GmbH**

Under the belief that it is an important societal responsibility of us to appropriately protect and handle personal data of individuals living in the European Union (hereinafter referred to as “EU”) region, C-E (DEUTSCHLAND) GmbH, Stephanstrase 3, 60313 Frankfurt am Main, tel.: +49 69 2992480, email: [cej-perfectlight@ml.citizen.co.jp](mailto:cej-perfectlight@ml.citizen.co.jp), (hereinafter “we” and “us”) wish to inform you in this data protection notice as the controller pursuant to data protection law of how we process your personal data during your visit to our website and use of our contact form for requests and/or queries.

We shall comply with the “Regulation of the European Parliament and of the Council on the Protection of Natural Persons with regard to the Processing of Personal Data and on the Free Movement of Such Data (EU) 2016/679” (hereinafter referred to as “GDPR”) and other laws, regulations and guidelines on protection of personal information in EU as well as our regulations on protection and handling of personal information and this Privacy Policy and make efforts to thoroughly protect, manage and use all of the personal data we acquire and use.

Unless otherwise provided for herein, the terms as used herein shall have the meanings assigned to them in the GDPR and other laws and regulations on protection and handling of personal information in EU.

### **1. Which personal data about you do we collect?**

Personal data covers all information about an identified or identifiable natural person which you notify to us or which is generated or collected by us. This is, for example:

Personal data for queries and/or requests of a DVD for screenings: When you have a request, in particular the request for a DVD to view the films of the website privately (via contact form) or a request for a workshop, the content data inserted by you or generated about you are processed, such as your request, name, email address and message. We also collect information on the time, scope and, if applicable, location of your request.

Server log data: When you use our websites, data on your usage (such as the date and time of your visit, pages called up and files requested, type and version of the web browser used by you, type and operating system of the end device you use as well as your IP address) is temporarily stored in a log file on our server.

### **2. What do we use your personal data for, on what legal basis and for how long?**

#### **2.1 Your requests and queries**

Should you submit requests and/or queries to us via a contact form, per e-mail or via a service telephone, we process the information given therein to answer your query as well as the IP address and date/time of the request in order to avoid misuse of the contact form for the purposes to answer to your request, in particular send to you the DVD or Screenings or any other (marketing) information related to our light products and services.

The legal basis for the processing is your consent pursuant to Art. 6 (1) letter a GDPR in providing you with the aforesaid “queries” service.

You may withdraw your consent at any time with effect to the future. Please address your withdrawal to the contact details named at the top.

This data will be deleted when our communication with you has ended, i.e. when the factual situation at issue has been conclusively clarified and no further legitimate interest exists for the storage, respectively no further statutory obligations exist to store such data.

If you request for a workshop, we process your data (such as name, address, e-mail address and other order information) for purposes of processing the request and organisation and implementation of workshops. Furthermore, depending on your chosen mode of payment, the payment information required for the particular mode of payment will either be processed by us; for example IBAN and BIC numbers are stored by us.

The legal basis for the processing is the conclusion and fulfilment of the purchase contract for the ordered workshops, Art. 6 (1) letter b GDPR.

This data will be deleted when it is no longer needed to perform the contract, unless we are legally obliged to store it, e.g. on grounds of retention obligations under trade or tax law.

## **2.2 Provision of the website and rendering of services**

The processing of the server log data is necessary for technical reasons in order to provide the website and render the services and thereafter to ensure the system security.

The legal basis for the processing is our legitimate interest in providing the website with our services (Art. 6 (1) letter f GDPR). The processing is a mandatory prerequisite for the use of our website; no objection right is hence available.

Additionally, this data will be deleted if it is no longer needed for the aforesaid purpose.

The server log data may then be assessed in anonymised form for statistical purposes and to improve the quality of our internet presence. There is no link between the server log data and your personal data nor is the server log data combined in any way with other personal data sources.

## **3. Transfer of the data**

### **3.1 Transfer of data to data processors**

We partially use service providers, in observance of the statutory requirements, by means of data processor relationships, i.e. processing is performed on the basis of a respective contract, for our account, according to our directions and subject to our control.

Data processors are, in particular

- technical service providers whose services we retain for the provision of the website, e.g. service providers for software maintenance, data-processing operations and hosting;
- technical service providers, whose services we retain for the provision of functionalities, e.g. technically required cookies;
- service providers for the practical execution of advertising and marketing measures, e.g. service providers for e-mail distribution and analysis cookies.

In such cases we remain responsible for the data processing; the transfer and processing of personal data to or by our data processors is made on the legal basis upon which we are permitted to process data in each case. No separate legal basis is required.

### **3.2 Data transfer to third parties**

We partially also transmit your data to third parties, i.e. partners with whom we collaborate outside of a contracted processing. Such partners render their services on their own responsibility; the processing of your data by our partners is exclusively governed by the data protection notices of such third party.

### **3.2.1 Logistic enterprises**

In order to transport the goods we transmit your address and contact details, to the extent necessary, to parcel transportation enterprises. The legal basis for the transfer is the performance of the contract with you, Art. 6 (1) letter b GDPR.

### **3.2.2 Group companies**

Where applicable, we shall transfer the data supplied by you to the relevant branch offices and establishments of Citizen Electronics group in Germany and in other countries (US, Hong Kong, China and Japan) during the preparation or performance of services, if this is required to answer your requests and queries. The legal basis for the transmission shall be the rendering of the service for which you have submitted a request for quotation or a service, which has been contractually agreed with you, Art. 6 (1) b GDPR, or if we have a legitimate interest in processing your inquiry, Art. 6 (1) f GDPR.

## **3.3 Data transfers to other countries**

It is possible that the data processors named above (see 3.1) or other business partners (see 3.2) have their business seat in another country/abroad. Should this include business seats in countries outside the European Economic Area, that are not subject to any adequacy decisions by the EU Commission, we will ensure the protection of your personal data, as well as the enforceability of your rights concerning adequate guarantees (e.g. via data protection clauses, which the EU Commission has enacted or authorized). Please contact us (see point 9), should you need further information on this or wish to receive a copy of the guarantees.

## **4. Cookies and web analysis**

### **4.1 What are Cookies?**

We and our partners use so-called “Cookies” to fashion our website in a most user-friendly way and to enhance the relevance of advertisements for the users of our website. Cookies are small files stored on the user’s device. They allow the storage of information for a determinate period of time and the identification of the user’s device. For this purpose, also tracking-pixel might be used that are not stored on the user’s hard drive, but that may in the same way help to recognize a user’s device. When using the term “cookie”, this refers to cookies in the technical sense as well as tracking pixel and other technologies.

When you visit our website for the first time, the entry page will show information on privacy and respective wording regarding the consent to the use of Cookies. By actively continuing to use the website and not actively objecting to the use of Cookies, you agree to the use of Cookies and such consent will be stored in your browser (in the form of a Cookie), so that the information does not have to be repeated on every page of our website. Should the consent be missing in your browser (e.g. if you deleted your browser history) the privacy information will appear again the next time you visit our website.

### **4.2 What Cookies do we use on what legal basis and for how long?**

On this website we use three types of Cookies: (1) Cookies required for functional purposes, without which the functionality of our website would be reduced, (2) optional Cookies for analytics, and (3) optional Cookies for targeting and advertising purposes, generally set by third-party providers:

#### **4.2.1 Cookies required for functional purposes**

These Cookies are indispensable if we want to ensure proper functioning and easy navigation of our website. They allow, e.g., store your consent/non-consent to the use of Cookies and your selected Cookie settings. Such Cookies do not collect any information about you for marketing purposes and do not record the sites you visit when surfing the internet. A deactivation of this type of Cookies would reduce all or part of the functions of the website.

The legal basis for this processing is our legitimate interest (Art. 6 (1) lit f GDPR).

These Cookies are specifically set for individual sessions and expire when you leave the website and end the session.

#### **4.2.2 Cookies for analytics / Google Analytics**

Analytics Cookies gather general information on how users use a website, e.g. which pages they visit most frequently and whether they receive any error messages from websites. These Cookies do not collect any data that may lead to an identification of the user. The data collected with these Cookies will not be merged with any other information on the visitors of our website. All information collected with the aid of such Cookies exclusively serves the purpose to comprehend and improve the functionality and services of the website.

This website uses **Google Analytics**, a web analysis service of Google Inc. (“Google”). The information regarding your usage of this website generated by the use of Google Analytics is transmitted to and stored on a Google server in the US. However, due to the activated IP anonymisation on this website, Google will previously abbreviate your IP address within the member states of the European Union and in other contracting states under the Agreement on the European Economic Area. Only in exceptional cases will a full IP address be transmitted to a Google server in the U.S., where it will then be shortened. The IP address transmitted by the browser of the user will not be merged with any other Google data.

Google will use this information on our behalf to analyse the usage of our online offer by users, to compile reports on the activities regarding the use of the online offer, and to render further services to us in connection with the use of our online offer and internet usage. In this context, pseudonymous user profiles may be created from the processed data.

Users can prevent the storage of cookies by adjusting the setting our their browser accordingly; moreover, users can prevent that the data generated by the cookie on their use of the online offer is transmitted to and processed by Google by downloading and installing the browser plugin available at: <http://tools.google.com/dlpage/gaoptout?hl=de>.

The legal basis for this processing is our legitimate interest (Art. 6 (1) lit f GDPR).

The data collected by the use of such Cookies will be anonymised prior to analysis. You can deactivate or delete Cookies and the information stored therein at any time (cf. 4.3).

#### **4.2.3 Deactivation of Cookies for analysis**

A deactivation of this types of Cookies for analysis, targeting and advertising purposes does not reduce the functionality of our website. The Cookies of this type presently used by us are offered by the following providers, to whom you may refer for information on /description of the respective Cookies or if you wish to object to their use:

<b>Tool</b>	<b>Data protection policy of the provider</b>	<b>Option to object (Opt-out)</b>
Google Analytics	<a href="https://support.google.com/analytics/answer/6004245?hl=de">https://support.google.com/analytics/answer/6004245?hl=de</a>	<a href="https://tools.google.com/dlpage/gaoptout?hl=de">https://tools.google.com/dlpage/gaoptout?hl=de</a>
Vimeo	<a href="https://vimeo.com/privacy">https://vimeo.com/privacy</a>	<a href="https://vimeo.com/cookie_policy">https://vimeo.com/cookie_policy</a>
youtube	<a href="https://policies.google.com/privacy?hl=de">https://policies.google.com/privacy?hl=de</a>	<a href="https://policies.google.com/technologies/product-privacy?hl=de">https://policies.google.com/technologies/product-privacy?hl=de</a>  <a href="https://policies.google.com/technologies/managing?hl=de">https://policies.google.com/technologies/managing?hl=de</a>

If you would rather receive information about these Cookies directly from us, please contact us via email under the contact details provided at the top.

### **4.3 How can I deactivate Cookies?**

If you wish to generally deactivate analytics, targeting and advertising Cookies, you may deactivate individual Cookies by clicking on one of the links in the above table (opt out). Finally, you may prevent the use of any Cookies whatsoever by adjusting the settings in your browser accordingly. We wish to point out, however, that in such case the functionality of our website will be reduced if also Cookies required for technical purposes are blocked.

For further information on Cookies and individual providers, you may e.g. refer to [www.youronlinechoices.com](http://www.youronlinechoices.com), where you may also object to usage-based online advertising via certain or any tools. Click [here](#) to be forwarded directly to the preferences manager.

### **5. Links**

We use links to other internet presences of us on websites and services of third parties, e.g. to social media channels such as Twitter. These third parties are exclusively responsible for the data processing by such other service providers on their websites and their data protection notices apply.

### **6. Data transmission to Youtube**

We have integrated YouTube videos into our website that are stored at <http://www.YouTube.com> and can be played directly from our website. These are all integrated in the "extended data-protection mode", i.e. no personal data about you as a user is transferred to YouTube if you do not play the videos. Only if you play the videos is the personal data itemized in paragraph 2 transferred. We have no influence on this data transmission.

From the visit to the website YouTube receives the information that you have called-up the corresponding sub-page of our website. In addition, the personal data specified under point 1 above is transferred. This occurs regardless of whether YouTube makes a user account available, via which you are logged in, or whether no user account exists. If you are logged in with Google, your data will be assigned directly to your account. If you do not wish your profile to be associated with YouTube, you must log out before activating the button. YouTube stores your data as user profiles and uses them for purposes of advertising, market research and/or needs-oriented design of its websites. Such evaluation is undertaken (even for non-logged-in users) particularly for provision of requirement-specific advertising and to inform other users of the social network about your activities on our website. You have a right to object to the creation of these user profiles, although you must contact YouTube in order to exercise this right.

You can obtain further information on the purpose and extent of the data acquisition and its processing by YouTube in the data-protection statement. There you can also obtain further information on your rights and setting options to protect your private sphere: <https://www.google.de/intl/de/policies/privacy>. Google also processes your personal data in the USA and is subject to the EU-US-Privacy-Shield (<https://www.privacyshield.gov/EU-US-Framework>).

## **7. Vimeo**

Our website uses features provided by the Vimeo video portal. This service is provided by Vimeo Inc., 555 West 18th Street, New York, New York 10011, USA.

If you visit one of our pages featuring a Vimeo plugin, a connection to the Vimeo servers is established. Here the Vimeo server is informed about which of our pages you have visited. In addition, Vimeo will receive your IP address. This also applies if you are not logged in to Vimeo when you visit our website or do not have a Vimeo account. The information is transmitted to a Vimeo server in the US, where it is stored.

If you are logged in to your Vimeo account, Vimeo allows you to associate your browsing behavior directly with your personal profile. You can prevent this by logging out of your Vimeo account.

For more information on how to handle user data, please refer to the Vimeo Privacy Policy at <https://vimeo.com/privacy>. Vimeo also processes your personal data in the USA and is subject to the EU-US-Privacy-Shield (<https://www.privacyshield.gov/EU-US-Framework>).

## **8. Security**

We and our service providers take technical and organisational security measures to protect your personal data managed by us against accidental or deliberate manipulation, loss, destruction or access by unauthorised persons. Our data processing and our security measures are improved on a constant basis according to the technical developments.

During the transfer of your personal data to us it is encrypted with Secure Socket Layer (SSL). Personal data which is exchanged between you and us or other participating enterprises is fundamentally transmitted via encrypted connections which meet the latest technical standards.

Our employees and our retained service providers are naturally obliged to maintain confidentiality.

## **9. Your rights to information, correction, blocking or deletion**

Every natural person whose personal data we process has, in principle (i.e. depending on the respective preconditions), the following rights vis-à-vis us:

- Should you have questions regarding our processing of your personal data, we would be pleased to provide you at any time and at no charge with information on the data stored about you (Art. 15 GDPR).
- You have a right to the correction of incorrect data as well as completion of incomplete data (Art. 16 GDPR).
- You have a right to the blocking/limitation of the processing or to deletion of personal data concerning you which is no longer required or stored on grounds of legal obligations (Art. 17, 18 GDPR).
- You have a right to the transfer of the data in a structured, standard and machine-readable format, insofar as you have provided us with the data on grounds of a consent or contract between us and you (Art. 20 GDPR).

- You have the right to object at any time to the processing of your data for direct marketing purposes (Art. 21 para. 2 and 3 GDPR).
- You have the right to object to a processing on the basis of legitimate interest, in which case we are entitled to demonstrate our compelling reasons (Art. 21 para. 1 GDPR). We have pointed out above (clause 2) in which cases this right applies.
- Insofar as you have consented to a data processing, you can revoke this consent at any time with effect for the future, i.e. the legality of the data processing remains unaffected until the date of the revocation. After a revocation of consent, you may no longer be able to use our services.

Please address your concerns in writing (reference: data protection) or by e-mail to the contact details given at the top. We reserve the right to check your identity to ensure that your personal data is not disclosed to unauthorised persons.

Furthermore, you are entitled to file a complaint with a supervisory authority for data protection.

## **10. Amendments**

From time to time the content of this data protection notice may have to be modified. We therefore reserve the right to amend them at any time. We will also publish the amended version of the data protection notice at this place. When you revisit us, you should therefore reread the data protection notice.