

We take the protection of your personal data very seriously. We store and process your data solely within the scope of the tasks delegated to us and in accordance with legal requirements. This privacy policy is intended to inform you about the nature, scope and purposes of the collection, use and storage of your personal data and to explain your rights in this regard.

ARTICLE 1 DATA PROTECTION PROVISIONS

BDAE Holding GmbH, from now on also referred to as "Holding", welcomes you to this website. During your visit to our website, assorted data may be collected. Please read on to find out more.

All personal data collected during your visit to our website will be processed by us in accordance with the applicable data protection provisions.

ARTICLE 2 DATA CONTROLLER

BDAE Holding GmbH
Kühnehöfe 3
22761 Hamburg
Tel.: +49-40-30 68 74-0
Email: info@bdae.com

represented by the managing director: Andreas Opitz

ARTICLE 3 DATA PROTECTION OFFICER

Ralf Lohmann

HUBIT e.K.
Proprietor Haye Hösel
Bergiusstr. 4, 28816 Stuhr

Address:
Postfach 610120
28261 Bremen

Tel. 0421-89830294
Email: datenschutz@bdae.com

ARTICLE 4 DATA COLLECTION AND PROCESSING WHEN ACCESSING THE WEBSITE; DATA PROTECTION PROVISIONS

You can in principle use our website without entering any personal data. Every time our website is accessed, anonymous and temporary data (access data) is recorded and stored in a log file until it is automatically deleted from our provider's server:

IP-Adresse des anfragenden Rechners,

- Date and time of access,
- Name and URL of the retrieved data,
- Website from which access is made,
- Name of the internet service provider,
- Amount of data transferred,
- Report on whether retrieval was successful,
- Identification data for the browser and operating system used.

This data is stored in such a way that it cannot be directly used to personally identify you. This data will be erased or anonymised after the connection is terminated. This data is collected exclusively for technical reasons and does not personally identify you. The data is used exclusively for statistical purposes and to improve the services that we offer, and is not used to identify you. The legal basis for the temporary storing of data is legitimate interest in accordance with Article 6 Paragraph 1f of the GDPR, as such data is required by us to make the operation of our website technically possible.

ARTICLE 5 OBLIGATION TO SHARE PERSONAL DATA

You are in principle free to disclose personal data to us on this site, but are in principle not legally or contractually obliged to do so. In exceptional cases where you are contractually or legally obligated to disclose personal data, we will inform you separately in each case of data processing.

Choosing not to share personal data with us will not in principle result in any disadvantages for you. The same applies if you disable data collection via cookies. However, doing so may impair some of the site's functions. Your personal data will be required at the least in the event that you wish to fill out an online application with us. In addition, your email address will be required at the least in the event that you would like to subscribe to our monthly magazine.

ARTICLE 6 CONTACT

You can get in touch with us through our website by clicking "Contact" and using the email link – info@bdae.com – or by getting in touch with one of our contact persons, listed at <https://www.bdae.com/service/ansprechpartner>.

Zudem haben Sie die Möglichkeit, uns telefonisch zu kontaktieren.

PURPOSE OF DATA PROCESSING:

The data you transfer when making contact with us is used to process your query or in case you have any follow-up questions.

LEGAL BASIS:

The legal basis for processing your data when contacting us is Article 6 (1) (f) GDPR and our legitimate interest in being able to answer emails and telephone enquiries.

If your enquiry concerns concluding a contract with us, Article 6 (1) (b) GDPR serves as a further legal basis for data processing.

STORAGE PERIOD:

The data transferred to us will be stored by us for the duration of communication with you. After communication between us has ended, your personal data will be deleted unless it is subject to statutory data retention periods.

RECIPIENTS/RECIPIENT CATEGORIES:

Your message will be sent and received via BDAE Holding GmbH's internal email server and will also be stored on our rented servers. Our server operator works under a processing agreement to ensure your rights are protected.

Should your enquiry have the objective of concluding a contract with us, your data will be forwarded to the relevant third party as part of our intermediate services. These include the policyholder, the company commissioned with application processing and the insurance company.

Telephone enquiries are exclusively processed by us internally so that your data is not passed on to third parties.

DATA TRANSFER TO THIRD COUNTRIES OR AN INTERNATIONAL ORGANISATION:

Personal data provided by you in the course of contacting us will not be transferred to a third country or international organisation.

ARTICLE 7 ONLINE SUPPORT/LIVE CHAT

On our website, we provide you with an additional online support option: Our live chat. You can contact us using the Live Chat function. You can then either contact us directly via the chat or leave a message so that we can respond to your enquiry at a later time. Despite using an external tool, live chat data will also be transferred using an encrypted SSL connection.

In both instances we will require information such as your name, email address and your actual enquiry in advance. Data made available to us for the purpose of consultation will be stored by us and will be processed to answer your request.

The date and IP address from which you access our website will also be stored. The latter will be anonymized, making it impossible to infer your identity.

The exchange of information via live chat is intended for general information purposes only. No transactional data may, or should be exchanged using the live chat function. Health-related and sensitive information should also not be exchanged. The live chat function is not a replacement for personal consultation. Declarations of legal significance cannot be accepted or rendered through live chat.

PURPOSE OF DATA PROCESSING:

Data transferred by you when using our online support tool will be used to process your request(s) and in case of any follow-up questions.

LEGAL BASIS:

The legal basis for processing your data transferred using the live chat tool is Article 6 (1) (f) GDPR — our legitimate interest to process your enquiries and requests.

If your enquiry concerns concluding a contract with us, Article 6 (1) (b) GDPR serves as a further legal basis for data processing.

STORAGE PERIOD:

The data transferred to us will be stored by us for the duration of communication with you. After communication between us has ended, your personal data will be deleted unless it is subject to statutory data retention periods.

RECIPIENTS/RECIPIENT CATEGORIES:

The online support tool is hosted by LiveZilla GmbH. LiveZilla will not obtain access to your data. The data will be processed via our rented servers. Our server operator works under a processing agreement to ensure your rights are protected.

In the event that, contrary to our express request not to exchange transactional information via live chat, your enquiry has the objective of concluding a contract with us, we will forward your enquiry and contact data to the relevant third parties as part of our intermediate services. These include the policyholder, the company commissioned with application processing and the insurance company. The reason for such action is that contracts cannot be concluded via the live chat function.

DATA TRANSFER TO THIRD COUNTRIES OR AN INTERNATIONAL ORGANISATION:

Personal data transferred when using our contact form will not be transferred by us to a third country or international organisation.

ARTICLE 8 COOKIES

We use "cookies" to improve our website. Cookies are text information files which are stored on your computer through the web browser when accessing our website. Many cookies contain an identification number which allows us to match the cookie to a specific internet browser. This is how we are able to differentiate you and your browser from others.

There are two main types of cookie - temporary (transient) cookies and persistent cookies:

Temporary/transient cookies, also known as session cookies, are automatically deleted when you close the browser. For the duration of their use, session cookies store a so-called session ID, which allow different requests from your browser to be associated with the session, meaning that your computer may be recognised when you return to the website.

Persistent cookies are automatically deleted after a predetermined time. The duration of storage depends upon the cookie itself. In addition, it is possible to delete persistent cookies at any time through your browser's security settings.

PURPOSE OF DATA PROCESSING:

The following cookies are used on our website:

- Technically necessary cookies
 - Session cookies for language preferences, login settings and spam block, or ensuring functionality whilst filling in online applications so that the user is recognised during the individual stages of an online application.
 - Persistent cookies for identifying and storing visitor cookie preferences.
- Other cookies (not technically necessary)
 - Performance cookies for analysing surfing behaviour (particularly Google Analytics)
 - Cookies for throttling request rate
 - Cookies from third party providers may also be present if you, for example, play an iFrame integrated video on this website. That means that YouTube or Google cookies may be present. These cookies enable advertising to be individually adapted to your preferences and may store your Google account ID and date of last access

IPerformance cookies analysing the use of our website and surfing behaviour will collect data on:

- Distinguishing unique users from one another
- The amount of time spent on webpages
- Click paths
- Triggering conversions
- Search terms used
- Number of page visits
- Number of downloads

The processing of this data will always be pseudonymised to ensure that no data can be referenced to an individual user. Data collected through the use of cookies will not be merged or stored together with data from other users.

LEGAL BASIS:

The legal basis for processing personal data obtained from cookies stems from our legitimate interest in accordance with Article 6 (1) (f) GDPR. Our legitimate interest lies in the use of technically necessary cookies to ensure the user-friendly and attractive design of our website, and also to ensure we can offer a website at all. Our legitimate interest in analysing surfing behaviour lies in making our website design as user-friendly and attractive as possible.

DURATION OF STORAGE:

Session cookies used on our website are deleted as soon as you close your browser. Persistent cookies used on our website will be deleted a year after cookies have been set. Performance cookies intended to analyse surfing behaviour (Google Analytics) and all data collected will be stored for two years. Cookies for throttling request rate are only stored for one minute.

RIGHT TO OBJECT:

You have the option to object to data collection through cookies on our website at any time. You can set your browser to send notifications to inform you when cookies are set, allowing you to decide whether to accept or reject all, or certain, cookies. You can also delete stored cookies at any time.

Guidance on how to do so can be found for each respective browser below:

For Google Chrome:

<https://support.google.com/accounts/answer/61416?co=GENIE.Platform%3DDesktop&hl=en>

For Mozilla Firefox:

<https://support.mozilla.org/en-US/kb/block-websites-storing-cookies-site-data-firefox>

For Microsoft Internet Explorer / Edge:

<https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>

For Apple Safari:

https://support.apple.com/kb/ph21411?locale=de_DE

For Opera:

<https://help.opera.com/en/opera36/be-safe-and-private/#deleteprivate>

or by visiting the relevant support page for your internet browser. Please note that turning Cookies off may affect website performance.

ARTICLE 9 GOOGLE ANALYTICS

This website uses Google Analytics, a web analysis service of Google Inc., Menlo Park, California, USA (hereafter referred to as "Google"). Google Analytics uses cookies, which are text files stored on your computer (see Article 8 on Cookies) that make it possible to analyse how you use the website. Google Analytics uses session cookies, which are stored temporarily when you visit our website, and only collect data when the site is accessed.

Using cookies on our website, Google Analytics is able to collect information on your IP address and your surfing behaviour. Please note that Google Analytics only transmits and stores your usage data from our website in anonymised form. The extension code "get_anonymize();" has been added to Google Analytics to ensure that IP addresses are collected anonymously (known as IP masking). This is done to ensure that no conclusions can be made regarding your person.

More detailed information on Google Analytics terms and conditions of use and data protection can be found at <http://www.google.com/analytics/terms/us.html> or at <https://policies.google.com/?hl=en-GB&gl=de>.

PURPOSE OF DATA PROCESSING:

Google will use this information on our behalf in order to evaluate the use of our website, compile reports on website activities and to provide other services relating to website usage and internet usage. We may use transferred data to create anonymous usage profiles for visitors to our website. This helps us to optimise our website and adapt to the needs of visitors. As a result, we may attract more visitors to our website and increase our exposure.

LEGAL BASIS:

The IP address transmitted by your browser within the scope of Google Analytics will not be merged with any other data held by Google.

The collection, storage and processing of your personal data using cookies from Google Analytics takes place on the basis of our company's legitimate interest pursuant to Article 6 (1) (f) GDPR. The company has a legitimate interest in analysing user behaviour on our website, in order to make the website as attractive and user-friendly as possible. Doing so should enable every visitor to comfortably use our website, thereby attracting more visitors.

RECIPIENTS/RECIPIENT CATEGORIES: In order to process your usage data on behalf of Google, information obtained by cookies will be forwarded to Google in anonymised form.

PURPOSE OF TRANSFER TO A THIRD COUNTRY/INTERNATIONAL ORGANISATION:

The information generated by cookies concerning your use of this website is usually transmitted to and stored on a Google server in the USA. Our website uses IP anonymisation, which means that Google will anonymise your IP address

within member states of the European Union and in other states party to the Agreement on the European Economic Area before transmitting information to the USA by shortening it. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and then shortened.

Google processes the data in the USA and is bound by the EU-US Privacy Shield Framework Agreement. The USA is a state outside of the EU/European Economic Area (EEA) and therefore a third state. The EU Commission has not made an adequacy decision on the USA as a state. Google has, however, committed itself to the EU Privacy Shield. The EU Privacy Shield Framework is an agreement between the EU and the USA. In accordance with Article 45 (1) GDPR, the EU Commission issued an adequacy decision in which confirms that recipients in the USA offer an appropriate level of protection, so long as they have agreed to the EU Privacy Shield Framework.

STORAGE PERIOD:

Cookies transmit data to us when you are on our site and the cookie was not deleted. As soon as the cookie is deleted, data transmission will cease. From the moment the cookies are deleted, there is no longer any reference to the Cookie ID. This means that data is only available in anonymised form and conclusions regarding your identity can no longer be drawn. The cookies will be deleted as soon as your session is ended.

RIGHT TO OBJECT:

You have the right to object to the recording and processing of your personal data by Google Analytics at any time. You can prevent cookie storage, and therefore the recording of your IP address and surfing behaviour by changing your browser software's settings. Furthermore, to prevent Google from recording and processing the data generated by the cookie relating to your use of the website, you can download and install the browser plug-in available on Google's website under the following link

<https://tools.google.com/dlpage/gaoptout?hl=en-GB>

You may also prevent your data being used and processed by clicking on the following link. An opt-out cookie will be stored, preventing your data from being collected when you visit this website in future:

[Deactivate Google Analytics for this page].

ARTICLE 10 SOCIAL MEDIA BUTTON

Social media buttons from social networks are used on our website. However no personal data will be transmitted to the respective network's operators or processed in any way.

To increase the protection of your data whilst visiting our website, the social media buttons cannot be used without limitation, but are integrated into the page using a HTML link. This integration ensures that when you visit a website with these plug-ins, no connection with the social network providers is made. Clicking on one of the buttons will open a new browser window leading to the social media website selected. Once on the website (and after entering login credentials), you will be able to use the website's functions, e.g. the like or share button.

Please refer to the privacy notice of the social network provider for information on the purpose and scope of data collection, further processing, the use of personal data and your rights and your settings options for the protection of your privacy.

- <https://en-gb.facebook.com/policy.php>
- <https://policies.google.com/privacy?hl=en-GB&gl=de>
- <https://twitter.com/en/privacy>
- <https://privacy.xing.com/en>
- https://www.linkedin.com/legal/privacy-policy?_l=en_EN

ARTICLE 11 CONCLUDING INSURANCE CONTRACTS ONLINE

Our website gives you the option to conclude insurance contracts. The insurer and policy holder for each insurance product can be gleaned from the contract documentation. The terms and conditions for each product can be downloaded from our website. The insurer and policyholder are jointly responsible for data processing.

We manage both the initiation and implementation of contracts on behalf of the insurers and policyholders. The data controller collecting the data within the meaning of the GDPR varies depending on the insurance product concerned.

For more information on the nature and scope of data processing in the course of online applications for individual insurance contracts, please read the relevant privacy policy, which can be found at the end of each respective online application and which can also be accessed using the following link:

[LINKS TO RESPECTIVE INSURANCE PRODUCTS].

ARTICLE 13 YOUTUBE

This website contains content from the online video platform YouTube. YouTube is operated by YouTube LLC ("YouTube"), 901 Cherry Avenue, San Bruno, 94066

California, USA. YouTube LLC is represented by Google LLC ("Google"), 1600 Amphitheatre Parkway, Mountain View, 94042 California, USA. Videos from YouTube are integrated into our website in such a way that no data can be collected by YouTube so long as the video is not being played. Data will be collected by the third-party service providers only after accessing the video:

"Clicking on this video will open a new browser window, and the YouTube video will be played as an iFrame. Accessing this video is subject to Google's privacy policy."

By playing the video, YouTube or Google collects your IP address and the websites you have visited. This will be attributed to your YouTube account, should you own one and be logged into it. Furthermore, cookies from YouTube will be used to analyse your surfing behaviour. At no time will data relating to your surfing behaviour be processed by this website's data controller. Processing will only be carried out by the external operator of the video platform YouTube as soon as the video is played. Further information on YouTube's use of your personal data can be found in YouTube's privacy policy:

<https://policies.google.com/privacy?hl=en-GB&gl=de>.

ARTICLE 14 MAGAZINE

You can subscribe to the magazine "Leben und Arbeiten im Ausland" (in German only), issued by BDAE e.V., via our website. Magazine subscriptions, administration and dispatch will be carried out by BDAE e.V. The magazine, which will be sent monthly to the email address you provide, provides information on "Living and Working Abroad".

When subscribing to the magazine, we will collect and store your email address, subscription date and IP address.

Magazine subscriptions operate using a double opt-in process. This means that after you sign up, you will receive an email asking you to confirm your subscription. Failure to confirm your subscription will result in no magazine being issued to you. The date of subscription and confirmation, as well as the IP address used for subscription will be stored.

PURPOSE OF DATA PROCESSING:

The email address you provide us with will initially only be used to send your subscription confirmation. As soon as you have consented to have the magazine sent to you through the double opt-in process, the email address you used during subscription will be used exclusively to deliver magazine issues.

Emails containing magazine issues will also contain a web beacon. This is a small, pixel-size file which allows us to analyse the magazine's range and the number of times certain contributions are accessed.

This means that additional technical information regarding your browser, end device and IP address will be collected. This data is used to optimise the magazine and is only processed anonymously. This prevents personal analysis of your reading behaviour and prevents conclusions to be drawn about your person.

LEGAL BASIS:

The consent you provide through the double opt-in process is, in accordance with Article 6 (1) (a) GDPR, the legal basis for processing your email address, and delivering the magazine to your email address. When registering for the magazine, you provide consent that your email address will be used for these purposes and agree to the following statement of consent:

"I hereby consent to BDAE Holding GmbH sending emails to the email address disclosed by myself for the purpose of sending the magazine of the BDAE e.V. and the accompanying advertisements contained within the magazine. I have the right to withdraw my consent in the future at any time. I have read and understood the privacy policy with further information on data processing."

The anonymised analysis of user behaviour regarding the magazine takes place on the basis of our legitimate interest in accordance with Article 6 (1) (f) GDPR. Our legitimate interest lies in the optimisation of the magazine.

The statistical collection, analysis and recording of previous registration processes takes place on the basis of our legitimate interest in accordance with Article 6 (1) sentence 1 (f) GDPR. Our legitimate interest here lies in legally compliant newsletter registration and serves both our commercial interests and user expectations.

WITHDRAWAL OPTION:

Your consent to having the magazine delivered to your email address can be withdrawn at any time by cancelling your magazine subscription.

Follow the link and enter your email address:

Unsubscription:

<https://www.bdae.com/presse-und-aktuelles/journal/abmeldung> (in German)

You will automatically be removed from the mailing list after entering and submitting your email address. You can find the link in every email containing the magazine.

RECIPIENTS/RECIPIENT CATEGORIES:

The magazine is published by the BDAE e.V., which means your data will be transmitted to them. The administration of the magazine itself, however, is performed by us. Final magazine dispatch is performed on our behalf via newsletter2go.

de, which is why your email address is also transmitted to this company. All specified recipients work under a processing agreement to ensure your rights are protected.

The transmission of your personal data takes place via our own rented server. Our server operator works under a processing agreement to ensure your rights are protected.

DATA TRANSFER TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS:

Personal data transferred to us in the course of subscribing to the magazine and the subsequent processing of this data for the purpose of dispatch will not be transmitted by us to a third country or an international organisation. STORAGE PERIOD

We will store the email address used to order the magazine, for as long as the activation link contained in the email for the double opt-in process is active, i.e. for 7 days.

After you have clicked the link in the email to activate delivery, we will only process your email address for as long as you are subscribed to the magazine. Your email address will be deleted without delay as soon as you unsubscribe. This is done in accordance with statutory retention periods.

ARTICLE 15 CAREERS

You can send your application to us by email using the email address provided on our website karriere@bdae.com. When you send us your application, the email address you provide us, as well as your message and all transmitted application documents will be stored and processed as part of the application process. We wish to explicitly inform you, however, that email is not a secure means of communication, and may be intercepted or read by third parties. That is why we recommend you use our web upload function, available at www.webupload.bdae.com. This process is performed on our rented and secured server. The operator of this server works under a processing agreement to ensure your rights are protected.

PURPOSE OF DATA PROCESSING:

Data processing in the course of the application process is used to decide whether to enter into an employment relationship with you.

RECIPIENTS/RECIPIENT CATEGORIES:

Personal data which is collected by us in the course of the application process will not be transmitted to third parties, unless you have previously been informed. Should you have applied for a position with another company within the BDAE Group, your data will be transmitted to the company concerned. You will be explicitly informed of this in the position's vacancy notice.

LEGAL BASIS:

Personal data collection is used to decide whether to enter into an employment relationship with you. In accordance with Article 26 Paragraph 1 Sentence 1 of the German Federal Data Protection Act (BDSG), this serves as the legal basis for processing your personal data. Should your application contain special categories of personal data, Article 26 Paragraph 3 BDSG forms an additional relevant legal basis.

RECIPIENTS/RECIPIENT CATEGORIES:

Personal data sent to us in the course of the application process for a position with us will not, as a matter of principle, be given to third parties. Provided that you apply for a position with a company within the BDAE Group, we will collect your application details on behalf of the third-party company and transmit these details for further processing in the application procedure.

TRANSFER TO A THIRD COUNTRY/INTERNATIONAL ORGANISATION:

Personal data transmitted when contacting us will not be transferred to a third country or international organisation.

STORAGE PERIOD:

Your data will be stored for the duration of the application process and deleted after six months. Should your application with us be successful, all personal data necessary for the justification, performance and termination of the work relationship will be added to your personnel file.

RIGHT TO OBJECT:

You have the right to object to the processing of data with future effect at any time. This means, however, that you can no longer be considered in the application process.

RIGHTS OF THE DATA SUBJECT

To exercise your rights with relation to us please get in touch at:

BDAE Holding GmbH
Kühnehöfe 3
22761 Hamburg

Tel.: +49-40-30 68 74-0

Email: info@bdae.com

ARTICLE 16 YOUR RIGHTS AS A DATA SUBJECT

You are entitled to claim any rights you hold against us regarding your personal data:

- The right to access pursuant to Article 15 GDPR
- The right to rectification and/or completion of data pursuant to Article 16 GDPR
- The right to erasure of personal data pursuant to Article 17 GDPR
- The right to restriction of processing pursuant to Article 18 GDPR
- The right to data portability pursuant to Article 20 GDPR

Furthermore, you have the right to lodge a complaint against a data protection supervisory authority with regard to the processing of your personal data by and through us.

ARTICLE 18 RIGHT TO OBJECT TO DATA PROCESSING DUE TO LEGITIMATE INTEREST

- You have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions. If you make an objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or unless the data is processed for the establishment, exercise or defence of legal claims.
- Where your personal data is processed by us for direct marketing purposes, you shall have the right to object at any time to the processing of your personal data for such marketing, which includes profiling to the extent that it is related to such direct marketing.

ARTICLE 19 YOUR RIGHT TO LODGE A COMPLAINT WITH THE COMPETENT SUPERVISORY AUTHORITY

In accordance with Article 77 GDPR, 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 suspected infringement, if you consider the processing of personal data relating to you infringes the GDPR.

ARTICLE 20 DATA SECURITY

We have taken technical and organisational measures to protect your personal data from unauthorised access, destruction, loss or amendment by third parties.

ARTICLE 21 RIGHT OF ALTERATION

We reserve the right to alter this privacy policy at any time with future effect. It may be necessary to modify this privacy policy when we make changes to our website, or in order to comply with legal requirements.

We therefore recommend that you periodically read this privacy policy.

