

Social Media Networks Privacy Notice

1. Introduction

Being the operator of the social media networks, Sierra GmbH, Hamborner Str. 53, 40472 Düsseldorf (hereafter "we" or "us") are the data controller in charge of processing personal data of any users of such social media networks. You can find our contact details in the imprint of our website, while the contacts for questions concerning the processing of your personal data are provided directly in this Privacy Notice.

We are strongly committed to protecting your personal data. We collect, save, and use your personal data strictly in accordance with the provisions of this Privacy Statement and the applicable data protection provisions, including without limitation the European Union General Data Protection Regulation (GDPR) and national data protection provisions.

With this Privacy Notice, we wish to inform you to what extent and for what purpose your personal data is processed in connection with the use of our social media networks. Further information on how we process your personal data may be found in our general Privacy Policy which you find [here](#).

Personal Data

Personal data is all information about an identified or identifiable individual. This includes information about your identity such as your name, your e-mail address, or your postal address. Any information that cannot be directly linked to your identity (e.g. statistical details such as the number of users of the social media networks) is, however, not considered to be personal data.

As a rule, we will process such data only for purposes connected with the use of our social media networks, including for the provision of the desired information. Whenever personal data is collected by us, you are only required to provide the data that is absolutely essential. Also, you may be asked by us to provide additional details, which is optional information provided voluntarily. We let you know in each case whether the input fields are for mandatory or optional details. More specific details are provided in the relevant section of this Privacy Statement.

There is no automated decision-making on the basis of your personal data in connection with the use of our social media networks.

Processing personal data

Personal data processed or collected on social media is stored in accordance with the respective terms of use applicable on the respective platform. Further information about the respective social networks can be found below. If we extract the information provided by you from the social media platforms, we store these information on protected dedicated servers located within the European Union. Technical and organisational measures are taken to

protect such servers against loss, destruction, access, modification, or dissemination of your data by unauthorized persons. Access to your data will be permitted only to a limited number of persons in charge of the technical, commercial, or editorial support of the servers. Notwithstanding regular controls, full protection against all risks cannot be provided.

Your personal data is transmitted over the Internet in encrypted form. We use TLS/SSL encryption (Transport Layer Security/Secure Socket Layer) for data transmission.

Disclosure of personal data to third parties

We use your personal information exclusively for providing the services that you have requested from us. Insofar as we use external service providers in performing the service requested, such external service providers will also access the data exclusively for the purpose of performing the service. By taking the necessary technical and organisational measures we ensure compliance with data protection policies and we demand the same of our external partners.

Moreover, we will not disclose the data to any third parties, including without limitation for advertising purposes, without your express consent. We will disclose your personal data only if you have given your consent to disclosure of the data or insofar as we are entitled or obligated to do so under legal provisions and/or administrative or judicial orders. This may include, without being limited to, giving information for purposes of criminal prosecution, in order to avert danger, or in order to enforce intellectual property rights.

Deletion of data and duration of storage

We invariably delete or block any personal data provided by you as soon as the purpose of storage of such data has ceased to apply. However, we may continue to store your personal data beyond that, if such storage is governed by legal provisions to which we are subject, including without limitation the legal obligation to retain business records and documentation. In such a case, we will delete or block the personal data after the prescribed period of time has expired.

2. Social Media

We use various social media networks for information transfer and communication, to which you will find links on our website or in which you will find links to our website. Specifically, we use the social media networks Facebook, Instagram, TikTok, YouTube and the career network LinkedIn. The links are identified by the logo of their relevant providers.

Clicking on a link opens the relevant social media web pages; this Privacy Notice does not apply to such web pages. For further details on the provisions applicable on such web pages please refer to the relevant privacy statements of each of the providers; you can find them at:

Facebook: <http://www.facebook.com/policy.php>

Instagram: <https://help.instagram.com/155833707900388>

TikTok: <https://www.tiktok.com/legal/page/eea/privacy-policy/en>

YouTube: <https://policies.google.com/?hl=en&gl=en>

LinkedIn: <https://de.linkedin.com/legal/privacy-policy>

No personal information is forwarded to the relevant providers before clicking on the links. Calling up the linked website also constitutes the basis for data processing by the relevant website provider.

We would also like to point out here that the Federal Office for Information Security (BSI) provides general information on the safe use of social networks on its website at https://www.bsi.bund.de/EN/Themen/Verbraucherinnen-und-Verbraucher/Informationen-und-Empfehlungen/Onlinekommunikation/Soziale-Netzwerke/soziale-netzwerke_node.html.

The following information on the processing of your personal data also applies to our use of social media networks.

Facebook Fanpage

We operate a fan page on the social network Facebook. We use the fan page to provide information about our activities and offer a networks for communication. The social network Facebook is operated by Meta Platforms Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland (hereinafter: 'Meta'). In this respect, we use Meta's technical platform and services.

Delimitation of responsibility

Please note that you use the fan page and its functions at your own risk, especially with regard to interactive functions such as commenting, sharing or rating. Alternatively, you can also access the information offered on the fan page on our website.

Insofar as your personal data is processed by us in connection with your visit to the fan page, the explanations in this privacy policy applies. Due to the integration of the fan page in the offer of Facebook, it should also be noted that at the same time personal data is processed by Meta. When you visit the fan page, Meta collects, among other things, your IP address and other information that may be stored in the form of cookies on the device you are using or in the respective browser. We have no influence on the processing of data by Facebook; in particular, Facebook does not act as a processor for us under our responsibility. For data processing by Meta - at least according to Meta - the guidelines of Facebook, which are available at <https://www.facebook.com/policy.php> apply. We would like to point out that the data collected about you by Meta in this context may also be transferred outside the European Union.

In terms of data protection law, a joint responsibility of Facebook and us for the operation of the fan page or the evaluation of user data when visiting the fan page is assumed. In accordance with data protection regulations, we have entered into an agreement with Meta to delineate responsibilities internally.

Facebook Insights

Meta offers administrators of fan pages the opportunity to get an overview of the use of the fan page and its users via the Page Insights feature. Page Insights can be used primarily to access and evaluate statistical data.

We use the data from Page Insights to make the fan page as attractive and efficient as possible. For this purpose, Meta provides us with data which Meta has generated itself. For more information on the functionality and responsibility for the page insights feature, please visit Facebook at https://www.facebook.com/legal/terms/page_controller_addendum.

Messenger

Facebook offers to users who are registered on Facebook, the possibility for immediate communication via Facebook Messenger. If you contact us via Facebook Messenger, the transmitted data will be stored and used by us exclusively for the purpose of answering your request. The legal basis for the processing of your data is your consent in accordance with Art. 6 (1) (a) GDPR as well as our legitimate interest within the meaning of Art. 6 (1) (f) GDPR. Our legitimate interest lies in the collection and processing of customer inquiries, in the evaluation of customer inquiries and in the controlling of possible abuse.

The data will be deleted as soon as it is no longer necessary to achieve the purpose of its collection. For your personal data, this is the case once the conversation has ended. For us, the conversation ends when it can be inferred from the circumstances that the facts are finally clarified. The user has the possibility to revoke his consent to the processing of personal data at any time; in this case the data will be deleted immediately if there is no basis for further storage.

Further information

If you have questions about the use of personal data by us in connection with the use of the fan page on Facebook, you can always contact us and our data protection officer. The contact details and the communication channels are explained in this Privacy Notice. If you have questions about data protection on Facebook, we ask you to contact Meta directly.

Instagram

We also have an account on the social network Instagram. We use our Instagram account to publish information about our activities and offer another channel for communicating with us. The social network Instagram is operated by Meta Platforms Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland (hereinafter: 'Meta').

Please note that you use Instagram and its functions at your own risk, especially with regard to interactive functions such as commenting, sharing or rating.

Delimitation of responsibility

Within the scope of Instagram's capabilities, we endeavour to ensure the protection of your privacy and your private data. Insofar as your personal data is processed in connection with your visit to the Instagram account by us, the explanations in this privacy policy apply without restriction. Due to the integration of the account into Meta's offering, it should also be noted that personal data is processed by Meta at the same time. When you access our Instagram

content, Meta collects, among other things, your IP address and other information that may be stored in the form of cookies on the device you are using or in the respective browser. We have no influence on the data processing by Instagram; in particular, Meta does not act as a processor for us under our responsibility. According to Meta, data processing by Facebook is subject to Meta's guidelines, which are available at https://www.facebook.com/help/instagram/155833707900388?cms_id=155833707900388. We would like to point out that the data collected about you by Meta in this context may also be transferred outside the European Union.

From a data protection perspective, Meta and we have two separate responsibilities for the operation of the Instagram account and the associated communication and evaluation options. Insofar as your personal data is processed by us in connection with your visit to our Instagram page and we alone decide on the purposes and means of this data processing, we are responsible for this data processing. This is usually the case when you communicate directly with us via the 'Instagram Direct Messaging' function and transmit your data to us in the process. Insofar as your personal data is processed by Meta and Meta alone decides on the purposes and means of data processing, Meta is solely responsible for this data processing. This applies in particular to the evaluation of user behaviour by Meta for its own purposes.

Instagram Insights

Meta offers Instagram account operators the option of using the 'Instagram Insights' feature to obtain an overview of the use of the account and its users. Instagram Insights primarily allows statistical data to be accessed and evaluated. We use the data from Instagram Insights to make the Instagram account as attractive and efficient as possible. For this purpose, Meta provides us with data that Meta itself has generated on its own responsibility. The data we receive from Meta is mostly anonymised data and statistics. Insofar as we receive personal data in this context, we are responsible for further processing this data to evaluate the use of our Instagram account.

Further information on Instagram Insights is available from Meta at https://help.instagram.com/1533933820244654?cms_id=1533933820244654.

Instagram Direct Messaging

On Instagram, you can communicate with us directly using the 'Instagram Direct Messaging' feature. If you contact us via Instagram Direct Messaging, we will store and use the data transmitted solely for the purpose of responding to your enquiry. The legal basis for the processing of your data is your consent within the meaning of Art. 6 (1) (a) GDPR and our legitimate interest within the meaning of Art. 6 (1) (f) GDPR. Our legitimate interest lies in the collection and processing of customer enquiries, the evaluation of customer enquiries and the prevention of misuse.

The data will be deleted as soon as it is no longer required for the purpose for which it was collected. For your personal data, this is the case when the respective conversation has ended. For us, the conversation is ended when it can be inferred from the circumstances that the matter in question has been conclusively clarified. You have the option of revoking your

consent to the processing of your personal data at any time; in this case, we will delete the data immediately if there is no basis for further storage.

Further Information

If you have any questions about our use of personal data in connection with the use of our Instagram account, please feel free to contact us and our data protection officer at any time. The contact details and communication channels are explained in our privacy policy. If you have any questions about data protection on the Instagram social network offered by Meta, please contact Meta directly.

TikTok

We also operate a channel on the social network TikTok. We use the TikTok channel to provide information about our activities and offer a channel for communication. The social network TikTok is operated by TikTok Technology Limited, 10 Earlsfort Terrace, Dublin, D02 T380, Ireland, and TikTok Information Technologies UK Limited, Kaleidoscope, 4 Lindsey Street, London, EC1A 9HP, United Kingdom (hereinafter: 'TikTok').

Please note that you use the social network TikTok and its functions at your own risk. This applies in particular to the use of interactive functions (e.g. likes, shares and comments).

Processing personal data

The data collected about you when using the service is processed by TikTok and may be transferred to countries outside the European Union. The data processed includes, among other things, the data you voluntarily provide, such as your name, username, date of birth, email address and telephone number, the content you create, upload or receive, information from contacts, purchase information and other information you provide, your IP address, the application you use, details of the device and operating system you use (including device ID and application ID), information about websites you visit, your location and mobile phone provider, and information about your use of the service. This data is assigned to your TikTok account data. We have no influence on the type and scope of data processed by TikTok, the type of processing and use, or the transfer of this data to third parties. Information about what data is processed by TikTok and for what purposes can be found in TikTok's privacy policy at <https://www.tiktok.com/legal/page/eea/privacy-policy/en>.

We process the data you enter on TikTok, in particular your username and the content published under your account, insofar as we may share or link to your posts, respond to them, or create posts that refer to your account. The data you freely publish and distribute on TikTok is incorporated into our offering in this way and made available to our followers.

You can restrict the processing of your data in the general settings of your TikTok account and under 'Account and privacy settings' and 'Security'. In addition, on mobile devices, you can restrict TikTok's access to contact data, photos and videos, location data, etc. in the settings options. However, this depends on the operating system used. Further information on these points can also be found at <https://support.tiktok.com/en/account-and-privacy> and <https://support.tiktok.com/en/safety-hc>.

TikTok Analytics

TikTok offers TikTok account operators the option of using the 'Analytics' function to obtain an overview of the use of the account and its users. TikTok Analytics primarily allows statistical data to be accessed and evaluated. We use the data from TikTok Analytics to make the TikTok account as attractive and efficient as possible. For this purpose, TikTok provides us with data that TikTok itself has generated on its own responsibility. The data we receive from TikTok is mostly anonymised data and statistics. Insofar as we receive personal data in this context, we are responsible for further processing this data to evaluate the use of our TikTok account. Further information on analytics is available from TikTok at https://www.tiktok.com/login?enter_from=tiktokstudio&enter_method=redirect&lang=en-GB&redirect_url=https%3A%2F%2Fwww.tiktok.com%2Ftiktokstudio%2Fanalytics and <https://www.tiktok.com/creators/creator-portal/en-us/tiktok-content-strategy/understanding-your-analytics/>.

Direct Messaging

On TikTok, you can communicate with us directly using the 'Direct Messages' feature. If you contact us via the direct messaging function, the data transmitted will be stored and used by us exclusively for the purpose of responding to your enquiry. The legal basis for the processing of your data is your consent within the meaning of Art. 6 (1) (a) GDPR and our legitimate interest within the meaning of Art. 6 (1) (f) GDPR. Our legitimate interest lies in the collection and processing of customer enquiries, the evaluation of customer enquiries and the prevention of misuse.

The data will be deleted as soon as it is no longer necessary for the purpose for which it was collected. For your personal data, this is the case when the respective conversation has ended. For us, the conversation is ended when it can be inferred from the circumstances that the matter in question has been conclusively clarified. You have the option of revoking your consent to the processing of your personal data at any time; in this case, we will delete the data immediately if there is no basis for further storage.

Further Information

If you have any questions about our use of personal data in connection with the use of our TikTok account, please feel free to contact us and our data protection officer at any time. The contact details and communication channels are explained in our privacy policy. If you have any questions about data protection at TikTok, please contact TikTok directly.

YouTube Channel

We also operate a channel on the YouTube video platform. We use this channel to provide information about our activities and as a means of communication. The YouTube video platform is operated by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland (hereinafter referred to as 'Google').

We would like to point out that you use the video platform and its functions at your own risk. This applies in particular to the use of interactive functions (e.g. discussions, comments).

Processing personal data

The data collected about you when using the service is processed by Google and may be transferred to countries outside the European Union. The data processed includes, among other things, the data you voluntarily provide, such as your name, user name, email address and telephone number, the content you create, upload or receive, such as photos and videos, documents and spreadsheets, as well as comments, your IP address, details of the device you are using, information about the websites and content you have accessed, your location and your mobile phone provider. We have no influence on the type and scope of data processed by Google, the type of processing and use, or the transfer of this data to third parties. Information about what data is processed by Google and for what purposes can be found in Google's privacy policy at <https://policies.google.com/?hl=en&gl=en>.

We process the data you enter on YouTube, in particular your user name and the content published under your account, insofar as we may link to or respond to your posts or write posts that refer to your account. The data you freely publish and distribute on YouTube is included in our offering in this way and made available to our followers.

You can restrict the processing of your data in the general settings of your Google account. In addition, on mobile devices, you can restrict Google's access to contact and calendar data, photos, location data, etc. in the settings options. However, this depends on the operating system used. In addition to these tools, Google also offers specific privacy settings for YouTube. You can find out more at: <https://policies.google.com/privacy?hl=en&gl=en#infochoices>.

YouTube Analytics

Google offers YouTube channel operators the option of using the 'YouTube Analytics' function to obtain an overview of the use of the account and its users. YouTube Analytics can be used primarily to access and evaluate statistical data. We use the data from YouTube Analytics to make the YouTube channel as attractive and efficient as possible. For this purpose, Google provides us with data that Google itself has generated on its own responsibility. The data we receive from Google is mostly anonymised data and statistics. Insofar as we receive personal data in this context, we are responsible for further processing this data to evaluate the use of our YouTube channel. Further information on YouTube Analytics is available from Google at <https://support.google.com/youtube/answer/9002587?hl=en>, among other places.

Further Information

If you have any questions about our use of personal data in connection with the use of the YouTube channel, please feel free to contact us and our data protection officer at any time. The contact details and communication channels are explained in our privacy policy. If you have any questions about data protection at Google, please contact Google directly.

LinkedIn

We operate an account on the LinkedIn career network. We use this account to provide information about our company and our activities and to offer a channel for communication.

The LinkedIn career network is operated by LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland ('LinkedIn').

Please note that you use the career network and its functions at your own risk. This applies in particular to the use of interactive functions (e.g. liking, sharing, commenting).

Processing personal data

The data collected about you when using the service is processed by LinkedIn. It cannot be ruled out that data may also be transferred to countries outside the European Union. The data processed includes, among other things, the data you voluntarily provide, such as your name, user name, email address, telephone number, information about your professional career, profile data, content you create, upload or receive, comments, your IP address, details of the device you use, information about websites and content you visit, and your location. We have no influence on the type and scope of data processed by LinkedIn, the type of processing and use, or the transfer of this data to third parties. Information about what data is processed by LinkedIn and for what purposes can be found in LinkedIn's privacy policy at <https://en.linkedin.com/legal/privacy-policy?>.

We process the data you enter on LinkedIn to the extent that we may like, comment on or share your posts, or contact and interact with you. The data you freely publish and distribute on LinkedIn is included in our offering in this way.

You can restrict the processing of your data in the general settings of your LinkedIn account. In addition, on mobile devices, you can restrict LinkedIn's access to contact and calendar data, photos, location data, etc. in the settings options. However, this depends on the operating system used. You can find out more about the privacy settings on LinkedIn at: <https://en.linkedin.com/legal/privacy-policy?>.

Analysis

LinkedIn offers LinkedIn account operators the opportunity to obtain an overview of the use of the account and its users. The analysis functions can be used primarily to call up and evaluate statistical data. We use the data to make our account as attractive and efficient as possible. For this purpose, LinkedIn provides us with data that LinkedIn itself has generated on its own responsibility. The data we receive from LinkedIn is mostly anonymised data and statistics. Insofar as we receive personal data in this context, we are responsible for further processing this data to evaluate the use of our LinkedIn account. Further information can be found in LinkedIn's privacy policy at <https://en.linkedin.com/legal/privacy-policy?>.

Communication

LinkedIn gives you the opportunity to communicate with us directly. If you contact us via LinkedIn, we will store and use the data you provide solely for the purpose of responding to your enquiry. The legal basis for the processing of your data is your consent within the meaning of Art. 6 (1) (a) GDPR and our legitimate interest within the meaning of Art. 6 (1) (f) GDPR. Our legitimate interest lies in the collection and processing of enquiries, the evaluation of enquiries and the prevention of misuse.

The data will be deleted as soon as it is no longer necessary for the purpose for which it was collected. For your personal data, this is the case when the respective conversation has ended. For us, the conversation is ended when it can be inferred from the circumstances that the matter in question has been conclusively clarified. You have the option of revoking your consent to the processing of your personal data at any time; in this case, we will delete the data immediately if there is no basis for further storage.

Further Information

If you have any questions about our use of personal data in connection with the use of your LinkedIn account, please feel free to contact us at any time. Our contact details and communication channels are explained in our privacy policy. If you have any questions about data protection at LinkedIn, please contact LinkedIn directly.

3. Communication of personal data

Whenever necessary, we may communicate your personal data to entities that provide services to us.

In those cases, we contractually impose that those recipients implement adequate security measures to protect your personal data.

The categories of recipients to whom we may communicate personal data include:

- i. PSERVERS Consulting, Lda.
Professor Vieira de Almeida 5 10 C
P-1600 Lisbon, Portugal
- ii. Performance Sales, Lda., Av. Marginal, Edifício Parque Oceano, 40 andar, 2780-322 Oeiras
- iii. ABLE NEXT SOLUTIONS, LDA., com sede na Rua Infantaria 16, nº.9-1º Esquerdo, 1250-129 Lisboa
- iv. Sierra Portugal, S.A., Lugar do Espido, Via Norte 4470-177 Maia, Portugal
- v. moreperform GmbH, Weißenburgstraße 52, 40476 Düsseldorf

And possibly other providers of the following services:

- v. Community management for the Facebook Fan Page
- vi. Client support for products and promotions
- vii. Promote and support to Facebook Contests

We may possibly transfer your personal data in the context of a business sale or of the shopping center “ALEXA Berlin”, of a merger, demerger or control change within our company or in the context of preparing any of those events. In any case, the processing of the data by the entity for whom they have been transferred will respect the terms of the present personal data protection commitment.

4. Your rights and contact

If you want more detailed information or wish to exercise your rights, you can contact us at any time so that we can take care of your concerns.

Rights of the data subjects

You have extensive rights with respect to the processing of your personal data. First of all, you have an extensive right to information and under certain circumstances may demand correction and/or deletion or blocking of your personal data. You can also demand restriction of processing and you have a right of objection. You also have a right to data portability with a view to personal data that you have transmitted to us.

If you wish to assert any of your rights and/or want more detailed information concerning your rights, please contact us through the following email: dataprotection@alexacentre.com. Alternatively, you may contact our data protection officer.

Consent withdrawal and objection

You may at any time withdraw your consent. The withdrawal of the consent does not affect the legality of any processing performed on the basis of such consent up until the withdrawal. In such cases as well, please contact our customer service and/or our data protection officer.

Insofar as the processing of your personal data is based on legitimate interest and/or public interest as legal basis, you can object to the data processing. Your objection will lead to a review and, if necessary, to termination of the data processing. You will be informed of the outcome of the review and – if the data processing is to be continued nonetheless – you will receive further information from us on why the data processing is admissible.

Data protection officer and contact

We have appointed an external data protection officer who supports us in data protection issues and who you can contact directly. If you have questions regarding our handling of personal data or if you require other information on data protection issues, please do not hesitate to contact our Data Protection Officer and his team:

E-mail: dataprotection@alexacentre.com

Complaints

If you are of the opinion that the processing of your personal data does not comply with this Privacy Statement or the applicable data protection provisions, you have the right to file a complaint with a supervisory authority. You can file a complaint with our data protection officer. Our data protection officer will review the matter and inform you of the outcome of the review.

5. Links to other websites

Our social media networks may contain links to other websites. Generally, these links are identified as such. We cannot control to what extent linked websites comply with the

applicable data protection provisions. We therefore recommend that for other providers' data protection statements, you refer to the information given on their respective websites.

6. Updates to this Data Protection Commitment

Any revision of this Privacy Statement is identified by the date specified (see below). We reserve the right to amend this Privacy Statement at any time with effect for the future. The terms of the present commitment may be altered or updated, which will be subject to disclosure on our social media networks and our website. We recommend obtaining information on any changes of this Privacy Statement on a regular basis.

7. Document changes

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