

PRIVACY NOTICE **WEBSITE** **(EUROPA)**

CONTENT

1.	Scope	3
2.	Controller	3
3.	Contact person	4
4.	What sources and data do we use?	4
5.	Processing purposes and legal basis	5
6.	Recipient and transmission to third parties	6
7.	Cookies	9
8.	Data storage	11
9.	Data transfers to third countries	11
10.	Your rights	11
11.	Technical safety	12
12.	Profiling	13
13.	Amendment of the data protection notice	13

1. SCOPE

This privacy notice applies to the Internet offer of the Finsbury Glover Hering Europe GmbH <https://fgh.com> and to the personal data collected via these Internet pages. The data protection notices and declarations of other providers to which reference is made, for example via links, apply to the Internet pages of these providers.

According to Article 4 of the GDPR, personal data is any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an on-line identifier, or one or more factors specific to the physical, physiological, genetic, psychological, economic, cultural or social identity of that natural person.

References to legal regulations refer to the General Data Protection Regulation (GDPR), as well as the Federal Data Protection Act (BDSG) in the version valid from 25.05.2018.

2. CONTROLLER

The competent controller within the meaning of the General Data Protection Regulation (GDPR), other data protection laws applicable in member states of the European Union, and other provisions relating to data protection is:

Finsbury Glover Hering Europe GmbH

Address: Berliner Allee 44, 40212 Düsseldorf

Commercial Register: Düsseldorf Local Court, Commercial Register Number HRB 4065

VAT ID: DE215379414

Management Board: Alexander Geiser (CEO), Christoph Bertram, Dr. Hans-Elmar Döllekes, Folker Dries, Dr. Brigitte von Haacke, Dr. Phoebe Kebbel

Chairwoman: Tina Mentner

3. CONTACT PERSON

Finsbury Glover Hering Europe GmbH has appointed a data protection officer (DPO) in accordance with the GDPR.

The contact details of the data protection officer:

Data Protection Officer
Berliner Allee 44
40212 Düsseldorf
e-mail: privacy-europe@fgh.com

4. WHAT SOURCES AND DATA DO WE USE?

When you call up our web pages, you transmit data to our web server via your Internet browser (for technical reasons). The following data is recorded during an ongoing connection for communication between your Internet browser and our web server:

- Date and time of the request
- Name of the requested file
- Page from which the file was requested
- Access status (file transferred, file not found, etc.)
- Web browser and operating system used
- Complete IP address of the requesting computer
- Amount of data transmitted

For reasons of technical security, in particular to defend against attempts to attack our web server, this data is stored by us for a short time. It is not possible for us to draw conclusions about individual persons on the basis of this data. After seven days at the latest, the data is anonymised by shortening the IP address at domain level, so that it is no longer possible to establish a link to the individual user. In anonymised form, the data is also processed for statistical purposes; it is not compared with other data sets or passed on to third parties, even in excerpts.

With the exception of the above-mentioned data, personal data is only stored if you provide it to us voluntarily, e.g., as part of a registration, a survey or in order to execute a contract, and in these cases only to the extent that we are permitted to do so on the basis of your consent or in accordance with the applicable legal provisions (for further information, please refer to the section "Processing purposes and legal basis" below).

You are neither legally nor contractually obliged to provide us with your personal data. However, it is possible that certain functions of our websites depend on the provision of personal data. If you do not provide personal data in such cases, this may result in functions not being available or only available to a limited extent.

5. PROCESSING PURPOSES AND LEGAL BASIS

We process personal data in accordance with the provisions of the European General Data Protection Regulation (GDPR), the Federal Data Protection Act (BDSG) and other relevant laws.

We use the personal data collected during a visit to our website to make it as convenient as possible for you and to protect our IT systems from attacks and other illegal activities.

If you provide us with further personal data, e.g. within the scope of a registration, a contact form, a survey or for the execution of a contract, we will use this data for the aforementioned purposes, for customer administration purposes and - if necessary - for the processing and invoicing of any business transactions, in each case to the extent necessary for this purpose.

Insofar as you have given us your consent to process your personal data, this constitutes the legal basis for the processing (Article 6(1)(a) of the GDPR). Any consent granted can be revoked at any time. This also applies to the revocation of declarations of consent which were issued to us prior to the validity of the GDPR, i.e. before 25 May 2018. Please note that the revocation is only effective for the future. Processing operations that took place before the revocation are not affected.

The legal basis for processing personal data for the purposes of initiating or fulfilling a contract with you is Article 6 paragraph 1 letter b GDPR.

Insofar as the processing of your personal data is necessary for the fulfilment of our legal obligations (e.g. for the storage of data), we are obliged to do so in accordance with Art. 6 Par. 1 letter. c GDPR.

In addition, we process personal data for the purpose of safeguarding our legitimate interests and the legitimate interests of third parties in accordance with Art. 6 Para. 1 letter f GDPR. Such legitimate interests include maintaining the functionality of our IT systems, but also the marketing of our own and third-party products and services and the legally required documentation of business contacts.

6. RECIPIENT AND TRANSMISSION TO THIRD PARTIES

Finsbury Glover Hering Group

In the company, only those persons who need access to your data have access to it.

Processors and other service providers

We have commissioned a specialised service provider to operate our website. In connection with the maintenance and servicing of the systems, this service provider may also obtain knowledge of your personal data. We have concluded a so-called order processing contract with this service provider, which ensures that data processing is carried out in a permissible manner.

For the optimization of our websites, other qualified service providers (IT service providers, marketing agencies) can also be used. We only pass on personal data to these service providers if this is necessary for the provision and use of the websites and their functionalities, for the pursuit of legitimate interests or if you have consented to this. In case of order processing, an order processing contract will be concluded to ensure that the data processing is carried out in a permissible manner.

Third-party offers

Our websites may also contain offers from third parties. If you click on such offers, we will transfer data to the respective provider to the required extent (e.g. information that you have found this offer with us and, if applicable, further information that you have already provided for this purpose on our web pages).

Social plug-ins

If we use so-called "social plug-ins" of social networks such as Facebook, Twitter, XING and Google+ on our websites, we integrate them as follows:

When you visit our websites, the social plug-ins are deactivated, i.e. no data is transmitted to the operators of these networks. If you want to use one of the networks, click on the respective social plug-in to establish a direct connection to the server of the respective network.

If you have a user account with the network and are logged in at the moment the social plugin is activated, the network can assign your visit to our websites to your user account. If you want to avoid this, please log out of the network before activating the social plug-in.

When you activate a social plug-in, the network transmits the content it makes available directly to your browser, which embeds it into our websites. In this situation, data transfers can also take place, which are initiated and controlled by the respective social network. Your connection to a social network, the data transfers between the network and your system, and your interactions on this platform are governed solely by the privacy policy of the respective network.

The social plug-in will remain active until you disable it or delete your cookies (see the "Cookies" section below for more information).

If you activate a social plug-in, it is possible that personal data may be transferred to providers in countries outside the European Economic Area which, from the point of view of the European Union ("EU"), do not guarantee an "adequate level of protection" for the processing of personal data that meets EU standards. Please bear this in mind before you activate a social plug-in and thus trigger a transfer of your data.

Google Analytics and Tag Manager

This website uses the service "Google Analytics", which is offered by Google Inc. (1600 Amphitheatre Parkway Mountain View, CA 94043, USA), to analyse the website use by users.

The service uses "cookies" – text files which are stored on your end device. The information collected by the cookies is usually sent to a Google server in the USA and stored there.

On this website IP-anonymisation is used. The IP address of users is shortened within the member states of the EU and the European Economic Area. Due to this shortening, the personal reference of your IP address is no longer necessary.

You have the option of preventing the storage of the cookie on your device by making the appropriate settings in your browser. It cannot be guaranteed that you will be able to access all functions of this website without restrictions if your browser does not allow cookies.

You can prevent the transmission of your data and its collection and processing by Google. Google informs about this via the following link:

<https://tools.google.com/dlpage/gaoptout?hl=de>

Here you will find further information on the use of data by Google Inc:

<https://support.google.com/analytics/answer/6004245?hl=de>

We may also use the "Google Tag Manager" to integrate and manage Google's analysis and marketing services into our website.

With this service, website tags can be managed via an interface. The Google Tool Manager only implements tags. This means: no cookies are used, and no personal data is collected. The Google Tool Manager triggers other tags, which in turn may collect data. However, Google Tag Manager does not access this data. If a deactivation has been made at the domain or cookie level, it will remain in effect for all tracking tags to the extent that they are implemented with the Google Tag Manager.

LinkedIn

Within our online offer we use the marketing functions (so-called "LinkedIn Insight Tag") of the network LinkedIn. The provider is the LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA.

Every time you access one of our pages that contains LinkedIn functions, a connection to LinkedIn servers is established. LinkedIn is informed that you have visited our website with your IP address. In particular, the LinkedIn Insight Tag allows us to analyse the success of our campaigns within LinkedIn or to target audiences based on how users interact with our online services. If you are registered with LinkedIn, LinkedIn will be able to associate your interaction with our site with your user account.

Here you will find information on data usage by LinkedIn:

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

You can prevent the transfer of your data and its collection and processing by LinkedIn. LinkedIn informs about this via the following link:

<https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>

7. COOKIES

Cookies are small text files that are stored on your computer when you call up our website and enable your browser to be reassigned. Cookies store information such as your language setting, the duration of your visit to our website or your entries made there.

There are different types of cookies. Session cookies are temporary cookies that are stored in the user's Internet browser until the browser window is closed and the session cookies are deleted. Permanent or persistent cookies are used for repeated visits and are stored in the user's browser for a predefined time. First-party cookies are set by the website that the user visits. Only this website may read information from the cookies. Third party cookies are set by organizations that are not operators of the website the user is visiting. These cookies are used by marketing companies, for example.

The cookies used on this website are:

Name - Vendor	Cookie	Description	Typ	Storage Time
Google Analytics	_ga	Google Cookie for Website analytics. Gathers data on website users.	Third-party Cookie	730 days
	gat*			10 seconds
	_gid			1 day
	_ga_JW8NW6FHCJ			730 days
consent-manager	__cmpcccu*	Cookie by Consent-manager that asks users from Europe to consent to cookies.	Third-party Cookie	14 days
	__cmpconsent*			31 minutes
	nc_euconsent			-
Termly	TERMLY_API_CACHE	Cookie manager of US website	Third-party Cookie	-
	__tluid			364 days, 20 hours
LinkedIn	AnalyticsSyncHistory	Measurement	Third-party Cookie	29 days, 23 Hours, 53 minutes
	UserMatchHistory	Measurement		29 days, 23 Hours, 53 minutes
	Bcookie	Measurement		730 days, 11 Hours, 30 minutes
	Bscookie	Function		731 days, 11 Hours, 30 minutes
	lang	Function		-
	li_gc	Measurement		723 days, 22 Hours, 43 minutes
	li_sugr	Measurement		90 days
	lidc	Measurement		23 Hours, 53 minutes

8. DATA STORAGE

We delete your IP address and the name of your Internet service provider, which we only store for security reasons, after seven days. Otherwise, we delete your personal data as soon as the purpose for which we collected and processed the data no longer applies. Beyond this point in time, data will only be stored if this is necessary according to the laws, regulations or other legal provisions of the European Union or a member state of the European Union to which we are subject.

9. DATA TRANSFERS TO THIRD COUNTRIES

If we transfer personal data to service providers or group companies outside the European Economic Area (EEA), the transfer will only take place if we are authorized to transfer the data and the third country has been confirmed by the EU Commission as having an adequate level of data protection or if other appropriate data protection guarantees (e.g. binding internal corporate rules or EU standard contract clauses) are in place.

Further information and a copy of the measures implemented can be obtained from the Data Protection Officer.

10. YOUR RIGHTS

Every data subject has the right of access under Art. 15 GDPR, the right of rectification under Art. 16 GDPR, the right of deletion under Art. 17 GDPR, the right to restrict processing under Art. 18 GDPR and the right to data transferability under Art. 20 GDPR.

With regard to the right of information and the right of deletion, the restrictions according to §§ 34 and 35 BDSG apply.

In addition, there is a right of appeal to a data protection supervisory authority (Art. 77 GDPR in conjunction with Section 19 BDSG):

Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen
PO Box 20 04 44
40102 Düsseldorf

Phone: 0211/38424-0
Fax: 0211/38424-10
E-Mail: poststelle@ldi.nrw.de

Information on your right of objection under Art. 21 (GDPR)

Right of objection based on individual cases

Under Article 21 of the GDPR, you have the right to object at any time, for reasons arising from your particular situation, to the processing of personal data relating to you on the basis of Article 6(1)(e) GDPR (data processing in the public interest) and Article 6(1)(f) GDPR (data processing based on a balancing of interests); this also applies to profiling within the meaning of Article 4(4) GDPR based on this provision.

If you object, we will no longer process your personal data, unless we can prove compelling reasons for processing that are worthy of protection, that outweigh your interests, rights and freedoms or the processing serves to assert, exercise or defend legal claims.

The objection can be made without any formalities. You will find our contact details under points 2 and 3.

11. TECHNICAL SAFETY

We use technical and organizational security measures to protect your data managed by us against manipulation, loss, destruction and against access by unauthorized persons. We continuously improve our security measures in accordance with technological developments.

For security reasons and to protect the transmission of personal data and other confidential contents (e.g. orders or inquiries to the responsible person), this website uses SSL or TLS encryption. You can recognize an encrypted connection by the character string "https://" and the lock symbol in your browser line.

For security reasons, we recommend that you transmit e-mails exclusively in encrypted form. There are considerable risks involved in transmitting unencrypted messages. Therefore, please do not send us any sensitive data by unencrypted e-mail.

12. PROFILING

We do not use purely automated decision-making procedures under Article 22 of the GDPR.

If we should nevertheless use such a procedure in individual cases in the future, we will inform you of this separately, insofar as this is required by law.

13. AMENDMENT OF THE DATA PROTECTION NOTICE

We may change this privacy statement at any time by posting the amended version on this website, including the effective date of the amended version.

Date of publication: 10.08.2021