

## **Privacy Policy Social Media**

With this notice, we would like to inform you about the data we collect from you on our social media presences and how we use it.

You can find us in various social media with our own presence. Through this, we would like to provide you with a broad, multimedia offering and exchange information with you on topics that are important to you. In addition to the respective provider of a social network, we also collect and process personal user data on fan pages.

### **Controller**

Controller for the processing of personal data on this website and on our social media presences is:

Turtle GmbH („we“, „us“, „our“)

Schopenstehl 15

20095 Hamburg

Tel.: +49 (40) 2376714-60

E-Mail: [hello@go-turtle.com](mailto:hello@go-turtle.com)

Web: [www.go-turtle.com](http://www.go-turtle.com)

### **Data Protection Officer**

You can also contact our data protection officer at any time with questions about data protection:

Dr. Georg Schröder, LL.M

legal data Schröder Rechtsanwaltsgesellschaft mbH

Prannerstr. 1

80333 Munich, Germany

Phone: +49 (0)89 954 597 520

Fax: +49 (0)89 954 597 522

E-mail: [datenschutz@legaldata.law](mailto:datenschutz@legaldata.law)

### **General**

We link on this website to our presences in social networks. For this purpose, we have linked a graphic of the respective network.

No data is transmitted to the operators of the social networks when you load our website, but only when you actively follow the link to our profile on the respective social network.

When you access our profile page on a social network, the operator of the social network may set cookies on your end device, regardless of whether you have an account with the network or whether you are logged in there. Cookies are data packets that mark the user's

end devices with a specific identifier. Cookies are primarily set in order to be able to display personalized advertising to visitors to the social networks, including our profile pages.

This is done, for example, by displaying to the user on the pages of the social network advertisements from advertising partners of the social network whose websites the user has previously visited. In addition, cookies make it possible to create statistics about the use of our profile page (e.g. number of page views, user categories).

If we receive such statistical analyses from the operator of the social network, the data is anonymized by the operator beforehand, i.e. it is not possible for us to assign usage data to an individual user. If you are logged in to the social network, however, the operator of the social network may be able to assign the visit to our profile on the social network to your account there.

At least the following data is processed by the respective social network:

- IP address
- Date, time
- Visited page in social network

In addition - depending on the operator - other categories of data may also be processed, e.g.:

- Referral URL (page from which the user reached a subpage of the social network).
- URL of the internal and external pages accessed from the social network.
- End device of the user (desktop, smartphone, tablet)
- User language settings
- Region of the user

If you are logged into your user account of the respective network during this time, the network operator may be able to assign the collected information of the specific visit to your personal account.

If you interact via a "Share" button of the respective network, this information can also be stored in the user's personal user account and possibly published. If you want to prevent the collected information from being directly assigned to your user account, you must log out of the respective social network before clicking on the graphic.

You can also configure the respective user account accordingly.

We have no influence on which data is collected and transmitted by the operator of the social network, to which third-party recipients a transmission by the operator of the social network takes place and how long the data is stored by the operator of the social network. In this regard, we refer to the privacy policy of the respective social network.

The purpose pursued by us in processing your data on our profile page on the respective social network is to provide information about our offers and services and to respond to any inquiries on our profile page. The legal basis for the processing is Art. 6 (1) (f) GDPR. To this extent, public relations work is covered by our legitimate interests within the meaning of the provision. The legal basis for the use of social plugins such as "share" buttons is your consent pursuant to Art. 6 (1) a) GDPR.

You are not obliged to provide us with your data on our profile pages on social networks. If you do not want the operators of the social networks to collect data from you on our profile pages, you can prevent this by not accessing our profile pages.

We delete private messages that you send to us via social networks within one year of the last communication with you. Public posts from you (e.g. in our timeline) we keep published permanently until you explicitly request their deletion.

In the context of competitions, data may be collected for their processing. The details of this, such as which data is collected for which purpose, can be found in the data protection information and conditions of participation of the respective sweepstakes.

We reserve the right to delete illegal content published by users on our profile page on the respective social network, e.g. copyright infringements or criminally relevant statements. In addition, we store usernames and comments that are deleted due to violation of netiquette. These will only be kept for possible proof in case of legal disputes within the statute of limitations.

According to the case law of the European Court of Justice, we are jointly responsible with the operator of the respective social network for the operation of our profile page with regard to compliance with data protection regulations. In this context, the operator of the social network provides the associated IT infrastructure as well as the website of the social network and is basically the primary contact when it comes to the processing of your data on the pages of the social network (e.g. information or deletion). With regard to data processing on social networks, we therefore recommend that you contact the respective social network directly for information requests or other questions regarding user rights, such as a deletion request, as only the operators of the social networks have full access to your user data. If you no longer wish to have the data processing described here in the future, you can remove the connection of your user profile to our site by using the functions "I no longer like this

page" and/or "Do not subscribe to this page". However, you can also assert your legal rights against us. In this case, we will forward your requests to the operator of the social network.

You can find further information on data protection in our privacy policy.

## **Social media**

You can find us in various social media with our own presence. Through this, we would like to provide you with a broad, multimedia offering and exchange ideas with you on topics that are important to you. We include the following social networks on our website by linking:

### *Facebook*

If you access our Facebook fan page, Meta Platforms Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 D02 X525, Ireland, collects, stores and processes your personal data in accordance with Facebook's privacy policy. You can find the privacy policy here:

<https://de-de.facebook.com/policy.php>

As part of the "Facebook Insights" function, Facebook may provide us with the following data categories, among others, in anonymized / statistical form for the purpose of performance measurement and optimization of our Facebook presence:

- Predefined interactions on our fan page
- Timestamp
- Country/city of the user
- HTTP language code
- Age/gender group
- Previously visited website (so-called referral URL)
- End device of the user
- Facebook user ID (if logged in)

With regard to the processing of Insights data, there is a joint responsibility between Facebook and us, under which Facebook has assumed primary responsibility. This concerns the processing of Insights data and the implementation of data subject rights. Therefore, please contact Facebook directly regarding all obligations under the GDPR with regard to the processing of Insights data. We will forward your inquiries received by us in this regard to Facebook. Further details are set out in the Joint Controller Addendum, which can be found here: [www.facebook.com/legal/terms/page\\_controller\\_addendum](http://www.facebook.com/legal/terms/page_controller_addendum)

You can find more information about Facebook Insights here:

[www.facebook.com/legal/terms/information\\_about\\_page\\_insights\\_data](http://www.facebook.com/legal/terms/information_about_page_insights_data)

### *Instagram*

When you visit our Instagram channel, personal data is stored and processed by Meta Platforms Ireland, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 D02 X525, Ireland, as the provider of Instagram, in accordance with Instagram's privacy policy. The privacy policy can be found here:

<https://privacycenter.instagram.com/policy/>

For the purpose of demand-oriented design and continuous optimization of our pages, we use the statistics service Instagram Insights. This service records your activity on our site and makes it available to us in anonymized statistics. This gives us insights into, among other things, the interactions of our fan page visitors, the views of our page, the reach of posts, information about the activity of our subscribers, as well as information about which countries and locations our visitors come from, and statistics about the gender ratios of our visitors. Conclusions about individual users as well as access to individual user profiles by us are not possible.

### *LinkedIn*

On our LinkedIn page we will inform you about career prospects with us and you can contact us directly.

In doing so, personal user data is processed by LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland ("LinkedIn").

We use the analytics functions provided by LinkedIn to optimize the performance of our LinkedIn page. In doing so, LinkedIn provides us with a statically prepared - i.e. anonymized - compilation of certain data. These include, among others, the following data categories: Conversions (achievement of certain targets such as registrations for events, leads), user actions (e.g. clicks, views of certain ads) and target groups (e.g. professional position, industry). Conclusions about individual users and access to individual user profiles by us are not possible.

For more information about LinkedIn's Analytics features, please visit:

<https://business.linkedin.com/de-de/marketing-solutions/reporting-analytics>

In addition, we are also able to search for suitable candidates for vacancies based on certain characteristics (e.g. current position, skills, professional experience, salary expectations). In this way, specific LinkedIn profiles can be displayed to us, which we can contact directly.

LinkedIn's privacy policy can be found at:

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

## *YouTube*

On our YouTube channel you can find videos or helpful tips about our offer. The customer service team also professionally addresses users' questions and comments on YouTube.

Personal data is stored and processed by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4 D04 E5W5, Ireland ("Google"), as operator of YouTube, in accordance with Google's privacy policy. The privacy policy can be found here: <https://policies.google.com/privacy?hl=de&gl=de>

With the help of YouTube's Analytics functions, it is possible for us to perform certain statistical evaluations to optimize our channel. This includes, in particular, details on the most popular videos (e.g., users' dwell time, ranking of videos), target groups (e.g., countries, language settings, age and gender, activity times) and the reach of our channel (e.g., where users were redirected to a video from) and impressions (e.g., how many users have seen a certain ad). Conclusions about individual users as well as access to individual user profiles by us are not possible.

For more information about YouTube's Analytics features, see:

<https://support.google.com/youtube/answer/9002587?hl=de>

### **How is personal data shared?**

The provision of our services generally requires the involvement of instruction-dependent processors, such as data center operators or other parties.

External service providers who process data on our behalf are carefully selected by us and strictly bound by contract. The service providers work according to our instructions, which is ensured by strict contractual regulations, by technical and organizational measures and by supplementary controls.

As a matter of principle, we do not pass on your data collected on our profile page with the respective social network to third parties, unless this is necessary due to your consent or for the fulfillment of a contract with you. Insofar as we use external service providers (e.g. in the area of IT), this takes the form of commissioned processing with the service provider, on the basis of which the service provider is obliged to process data in accordance with our instructions. In addition, data may be passed on to courts and competent law enforcement and supervisory authorities on the basis of official orders and legal obligations.

We would like to point out that the US providers Facebook, Instagram and LinkedIn may transfer personal data to the USA. These providers oblige recipients outside the EU/EEA to comply with an appropriate data protection standard due to so-called EU standard contractual clauses. In addition, a transfer to a third country can also take place on the basis of the

recognition of an adequate level of data protection by the European Commission (so-called adequacy decision).

Your data will only be transmitted if you have given us your express consent to do so or on the basis of a statutory regulation.

### **Your legal rights**

Here you will find your rights in relation to your personal data. Details can be found in Articles 7, 15-22 and 77 of the GDPR. You can contact us as the data controller or our data protection officer in this regard.

#### **a) Right to revoke your data protection consent pursuant to Art. 7 (3) p. 1 GDPR**

You can revoke your consent to the processing of your personal data at any time with effect for the future. However, the lawfulness of the processing carried out until the revocation is not affected by this.

#### **b) Right to information according to Art. 15 GDPR**

You have the right to request confirmation as to whether we are processing personal data concerning you. If this is the case, you have the right to obtain information about this personal data as well as further information, e.g. the purposes of processing, the categories of processors of personal data, the recipients and the planned duration of storage or the criteria for determining the duration.

#### **c) Right to rectification and completion according to Art. 16 GDPR**

You have the right to request the correction of inaccurate data without undue delay. Taking into account the purposes of the processing, you have the right to request the completion of incomplete data.

#### **d) Right to erasure ("right to be forgotten") according to Art. 17 GDPR**

You have a right to erasure insofar as the processing is no longer necessary. This is the case, for example, if your data is no longer necessary for the original purposes, you have revoked your declaration of consent under data protection law or the data was processed unlawfully.

#### **e) Right to restriction of processing according to Art. 18 GDPR**

You have a right to restrict processing, e.g. if you believe that the personal data is incorrect.

#### **f) Right to data portability according to Art. 20 GDPR**

You have the right to receive the personal data concerning you in a structured, common and machine-readable format.

**g) Right of objection according to Art. 21 GDPR**

You have the right to object at any time, on grounds relating to your particular situation, to the processing of certain personal data concerning you.

In the event of direct marketing, you as the data subject have the right to object at any time to the processing of personal data concerning you for the purposes of such marketing; this also applies to profiling, insofar as it is related to such direct marketing.

**h) Automated decision in individual cases including profiling according to Art. 22 GDPR**

You have the right not to be subject to a decision based solely on automated processing - including profiling - except in the exceptional circumstances mentioned in Article 22 of the GDPR.

Decision-making based exclusively on automated processing - including profiling - does not take place.

**i) Complaint to a data protection supervisory authority pursuant to Art. 77 GDPR**

In addition, you can lodge a complaint with a data protection supervisory authority at any time, for example if you believe that the data processing does not comply with data protection regulations.

Der Hamburgische Beauftragte für Datenschutz und Informationsfreiheit  
Ludwig-Erhard-Str 22, 7. OG  
20459 Hamburg  
Tel.: 040 / 428 54 - 4040  
Fax: 040 / 428 54 - 4000  
E-Mail: [mailbox@datenschutz.hamburg.de](mailto:mailbox@datenschutz.hamburg.de)

However, we recommend that you always address a complaint to us first.

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