

Social Media Data Protection

neuwerk's LinkedIn Page

Scope of this privacy notice

This privacy notice explains how Neuwerk Frankfurt GmbH (hereinafter referred to as “neuwerk”) processes personal data when you visit, follow, interact with neuwerk's LinkedIn page. It also explains the limited joint controllership arrangement between neuwerk and LinkedIn Ireland Unlimited Company in relation to the processing of personal data for the generation of LinkedIn Page Insights.

This information supplements LinkedIn's own privacy information. LinkedIn is responsible for processing personal data for the operation of the LinkedIn platform and for other processing activities for which LinkedIn independently determines the purposes and means.

Terms and definitions

- “Personal data” means any information relating to an identified or identifiable natural person.
- “Processing” means any operation or set of operations performed on personal data, whether or not by automated means.
- “Page Insights” means aggregated statistics provided by LinkedIn regarding the use and performance of a LinkedIn Page.

1. Name and contact details of the controller

The controller responsible for the processing of personal data described in this notice, except where otherwise indicated below, is:

Neuwerk Frankfurt GmbH

Dieselstrasse 4 61184 Karben

Tel.: +49 511 93802

contact@nww.com

2. LinkedIn and joint controllership for Page Insights

LinkedIn is provided by LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland (“LinkedIn”).

In connection with the processing of personal data for the purpose of generating Page Insights relating to the LinkedIn presence, neuwerk and LinkedIn act as joint controllers within the meaning of Article 26 GDPR, to the extent set out in LinkedIn's Page Insights Joint Controller Addendum. <https://www.linkedin.com/legal//page-joint-controller-addendum>

The joint controllership is limited to the processing of personal data necessary for the generation of Page Insights. Although neuwerk receives Page Insights in aggregated form from which individual data subjects cannot be directly or indirectly identified, the underlying personal data are processed by LinkedIn. LinkedIn will process data that was provided by users/page visitors to LinkedIn, such as job function, country,

industry, seniority, company size, and employment status data from their profile. Additionally, LinkedIn will process information on how they have interacted with neuwerk's page, e.g., whether a visitor is a follower.

3. neuwerk and LinkedIn as Independent Controllers

For other processing activities carried out by neuwerk, such as responding to messages and enquiries, managing interactions with users and publishing or managing content, neuwerk acts as an independent controller. LinkedIn acts also as an independent controller for the processing it carries out for the operation and provision of its platform and services.

Further information regarding LinkedIn's processing and the Page Insights joint controllership arrangement is available at:

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

LinkedIn Page Insights Joint Controllership Addendum: <https://legal.linkedin.com/pages-joint-controller-addendum>

4. Data protection officer

If you would like to exercise your rights as a data subject, you can contact our data protection officer at: dataprotection@nww.com

Please keep in mind that in accordance with LinkedIn's joint controllership addendum, data subjects' rights requests relating to Page insights are forwarded and answered by LinkedIn, as described in the joint controller addendum.

5. Categories of personal data processed by neuwerk

Depending on how you use LinkedIn presence and interact with neuwerk, we may process the following categories of personal data:

- Profile and publicly available professional information, such as your name, profile picture, job title, employer and other information that you make visible to us through LinkedIn.
- Communication data contained in messages, enquiries and other communications sent to us through LinkedIn.
- Aggregated Page Insights provided by LinkedIn regarding the use and performance of the LinkedIn presence. For more details on LinkedIn processing of personal data to general Page Insights, please refer to this Joint Controller Addendum: <https://www.linkedin.com/legal/page-joint-controller-addendum>

6. Purposes and legal bases of the processing

a) Operation and management of the LinkedIn presence

neuwerk processes personal data that you make available when interacting with our LinkedIn presence in order to maintain and manage our public presence, publish and manage content, interact with users and communicate information about our company, activities, products and services.

Legal basis: Article 6(1)(f) GDPR. Our legitimate interests consist in maintaining an active and informative public presence, communicating with interested parties and managing interactions relating to our LinkedIn presence.

b) Responding to messages and enquiries

If you contact neuwerk through LinkedIn, we process the personal data contained in your message or enquiry in order to respond to you and handle your request.

Legal basis: Article 6(1)(f) GDPR where the processing is necessary to respond to and manage the enquiry. Where the processing is necessary for the performance of a contract with you or to take steps at your request prior to entering into a contract, Article 6(1)(b) GDPR may apply.

c) Interaction with content

neuwerk may process information relating to your interactions with our content, such as comments, reactions, shares and follows, where necessary to manage our LinkedIn presence and engage with users.

Legal basis: Article 6(1)(f) GDPR. Our legitimate interests consist in managing user interactions and evaluating the reception and relevance of our communications.

d) Page Insights

neuwerk uses Page Insights made available by LinkedIn in aggregated form to understand the reach and performance of the LinkedIn presence and our content and to improve our communications. The underlying processing for the generation of Page Insights is subject to the joint controllership arrangement with LinkedIn which can be found here: <https://www.linkedin.com/legal/page-joint-controller-addendum>

Legal basis: Article 6(1)(f) GDPR. Our legitimate interests consist in evaluating and improving the effectiveness and relevance of our LinkedIn communications.

e) Legal claims and disputes

Where necessary, neuwerk may process personal data for the establishment, exercise or defence of legal claims and for the handling of disputes.

Legal basis: Article 6(1)(f) GDPR. Our legitimate interest consists in protecting and enforcing our legal rights and defending ourselves against legal claims.

f) Recruitment and applications

Job vacancies are published on the neuwerk's LinkedIn page, while applications are submitted and processed through a separate job portal. Information on the processing of applicants' personal data is provided in the privacy notice available on the job portal.

Separate data protection information may be provided for specific campaigns, competitions, surveys or other activities where neuwerk processes personal data for purposes beyond the ordinary operation of its LinkedIn presence.

7. Categories of recipients

Depending on the processing activity, personal data may be disclosed by neuwerk to the following categories of recipients:

- Authorised employees of neuwerk who manage neuwerk's company page and/or require access to the data for the relevant purposes.
- LinkedIn, to the extent necessary for the use and operation of the LinkedIn platform and generating page insights
- Service providers supporting neuwerk in the management of its social media presence, where such providers process personal data on our behalf or otherwise receive personal data in accordance with applicable data protection law.
- Lawyers, courts, authorities and other recipients where disclosure is necessary in connection with legal claims, disputes or legal obligations.

If you publish content containing personal data on LinkedIn, such content may be accessible worldwide to other users and may be indexed, copied, archived or otherwise processed by third parties. neuwerk cannot control the subsequent processing of publicly available information by third parties.

8. Duration of storage

Personal data processed by LinkedIn in connection with the operation of the LinkedIn platform are retained in accordance with LinkedIn's applicable retention policies. For further information on LinkedIn's retention of personal data, please refer to LinkedIn's Privacy Policy.

Processing activity	Retention period / criterion
Messages and enquiries received by neuwerk through LinkedIn	For as long as necessary to handle and conclude the relevant enquiry or communication. Where necessary, the relevant information may be retained for an additional period for documentation, follow-up, the establishment, exercise or defence of legal claims, or to comply with applicable legal obligations.
Comments, reactions and other interactions	For as long as the relevant content or interaction remains available on neuwerk's LinkedIn Page and is relevant to the operation of the LinkedIn presence. neuwerk may periodically review and, where appropriate and within its control, delete or remove such content. The retention of personal data by LinkedIn in connection with the operation of the LinkedIn platform is subject to LinkedIn's own retention practices..
Personal data processed for legal claims or disputes	For as long as necessary for the establishment, exercise or defence of the relevant legal claims, taking into account applicable statutory limitation periods and legal retention obligations.
Page Insights	neuwerk receives aggregated Page Insights from LinkedIn from which data subjects cannot be directly or indirectly identified. The retention of the underlying personal data processed by LinkedIn for the generation and provision of Page Insights is governed by LinkedIn's applicable retention practices and privacy information.

9. Transfers to third countries

neuwerk does not transfer personal data obtained through its LinkedIn presence to recipients outside the European Economic Area ("EEA") for its own purposes unless this is necessary for a specific processing activity. Any such transfer will be carried out in accordance with the requirements of Chapter V of the General Data Protection Regulation ("GDPR") or other applicable data protection law.

LinkedIn may process personal data globally, including in countries outside the EEA, in connection with the operation and provision of its platform and services. Information on LinkedIn's international transfers and the applicable safeguards and transfer mechanisms is available in LinkedIn's Privacy Policy. <https://www.linkedin.com/legal/privacy-policy>

10. Rights of data subjects

Subject to the conditions and limitations set out in the applicable data protection law, you have the following rights in relation to personal data processed by neuwerk:

- Right of access
- Right to rectification
- Right to erasure
- Right to restriction of processing
- Right to data portability, where the requirements of applicable data protection law are met
- Right to object to processing, where the requirements of applicable data protection law are met

To exercise your rights as a data subject, please contact our data protection officer at the following email address : dataprotection@nww.com

11. Right to lodge a complaint

You have the right to lodge a complaint with a supervisory authority. For processing carried out by neuwerk as an independent controller, the competent supervisory authority is generally:

Der Hessische Beauftragte für Datenschutz und Informationsfreiheit (HBDI)

Gustav-Stresemann-Ring 1d

65189 Wiesbaden

Germany

Website: <https://datenschutz.hessen.de/>

For information concerning LinkedIn and the supervisory arrangements applicable to processing covered by the Page Insights joint controllership arrangement, please refer to LinkedIn's Page Insights Joint Controller Addendum and LinkedIn's privacy policy as mentioned above.

12. No obligation to provide personal data

You are generally under no legal or contractual obligation to provide neuwerk with personal data through LinkedIn. However, certain functions or requests may not be possible if the information necessary to respond to or handle the relevant matter is not provided.