

# Data protection declaration

13 February 2019

## WELCOME – Data protection at TSI

Protecting your data is very important to True Sale International GmbH (hereinafter referred to as 'TSI'). We treat your personal data confidentially and in accordance with statutory data protection requirements and this data protection declaration.

The internet pages of True Sale International GmbH can generally be used without entering any personal data. To the extent that personal data such as names, addresses or email addresses are collected on our pages, and where the processing of such data is not regulated by law, we will ask for your consent. These data will not be passed on to third parties without your express consent.

The processing of personal data will always be conducted in compliance with the General Data Protection Regulation and in agreement with the country-specific data protection provisions applicable to True Sale International GmbH.

TSI has implemented a number of technical and organisational measures to ensure the highest possible degree of protection for all personal data we process. However, internet-based data transmissions may in principle have security gaps, so absolute protection cannot be guaranteed. For this reason, every data subject is free to transmit personal data to us via alternative means, e.g. by telephone, telefax or email.

## Data protection at a glance

The following provides a quick and simple overview of the personal data we collect from you and how we handle that data. We also inform you about your rights under applicable data protection legislation and whom to contact if you have questions.

### What are personal data?

Personal data are all data from which you can be personally identified.

### Who is responsible for collecting data on this website?

The processing of data on this website is controlled by the operator of the website, True Sale International GmbH. Contact details are provided in the imprint of this website.

### What personal data are processed by TSI?

We usually process your first name, last name, your company address, telephone number, email address, and your date of birth where required for specific events. If you participate in TSI events we also store the necessary data relating to your participation. If you are a speaker at our events we process the documents you provide such as your CV and photograph for the presentation of speakers on our website and for the event documents. We also process personal data which we have legally obtained from publicly available sources such as a commercial register and the media and are allowed to process.

Further personal data are generated in the context of the business relationship in transactions and certifications, particularly through personal, telephone and written interaction initiated by you or your employer, such as details of the contact channel, date, occasion, outcome and (electronic) copies of written

correspondence. We do not collect personal data from particular categories referred to as 'sensitive data', such as religious affiliation.

### What are my personal data used for?

We mainly use your data to be able to meet our contractual obligations towards you, for example as part of your registration for a seminar. As a matter of principle, we store only such personal data as we require to meet our contractual obligations towards you (Art 6 I b) of the GDPR) and for the ordinary course of business.

Some of the data on the website are collected in order to ensure its error-free operation. Other data may be used to analyse user behaviour. When you fill in the contact form we use your data to respond to your queries.

### Analysis tools and tools from third-party providers

When you visit our website, your surfing behaviour can be statistically evaluated. This is done primarily with cookies and so-called analysis programs. The analysis of your surfing behaviour is anonymous; the surfing behaviour cannot be traced back to you. You may object to this analysis or prevent it by not using certain tools. You will find detailed information in the further sections of this data protection declaration

### What rights do I have regarding my data?

You have the right to receive information about the origin, recipient and purpose of your stored personal data free of charge at any time. You also have the right to request the rectification, blocking or erasure of this data. You can contact us at any time at the address provided in the imprint if you have any further questions on this and on the subject of data protection. Your specific rights and the individual provisions:

- Right of access under Article 15 GDPR,
- Right to rectification under Article 16 GDPR,
- Right to erasure under Article 17 GDPR,
- Right to restriction of processing under Article 18 GDPR,
- Right to object under Article 21 GDPR,
- Right to data portability under Article 20 GDPR.

The rights to access and erasure are subject to the restrictions pursuant to sections 34 and 35 of the German Federal Data Protection Act (BDSG). In addition, you have the right to lodge a complaint with the Hessian Commissioner for Data Protection and Freedom of Information (Article 77 GDPR in conjunction with Section 19 BDSG).

### Who is responsible for processing the data and whom can I contact?

The responsibility for processing the data within the meaning of the General Data Protection Regulation, further data protection laws applicable in member states of the European Union and other provisions on data protection lies with the General Manager of True Sale International GmbH, Mainzer Landstraße 61, 60329 Frankfurt, Germany, [datenschutz@tsi-gmbh.de](mailto:datenschutz@tsi-gmbh.de), website: [www.true-sale-international.com](http://www.true-sale-international.com)

#### **SSL or TLS encryption**

This site uses SSL or TLS encryption for security reasons and for the protection of the transmission of confidential content, such as the inquiries you send to us as the site operator. You can recognise an encrypted connection in your browser's address line when it changes from 'http://' to 'https://' and the lock icon is displayed in your browser's address bar.

If SSL or TLS encryption is activated, the data you transfer to us cannot be read by third parties

#### **Is this data protection declaration subject to changes?**

We reserve the right to amend the data protection declaration to reflect changes in legal conditions, in the services or in the way data are processed. Users are therefore requested to regularly inform themselves of the content on our website.

#### **General notes and mandatory information**

##### **Why and on what legal basis do we store personal data?**

##### **Purpose of data processing:**

As a matter of principle, we store only such personal data as we require to meet our contractual obligations towards you (Art 6 | b) of the GDPR) or to meet your information needs when you request information or wish to be included in our newsletter on events, or in establishing business contacts.

##### **Lawfulness of processing – consent and legitimate interest (Article 6 | f) GDPR)**

We inform you that the provision of personal data may be necessary for compliance with legal provisions (e.g. tax regulations) or under contractual provisions (e.g. details on the contractual partner).

Certain data processing operations require your consent. In such constellations we inform you separately of this circumstance and offer you to allow us this data processing, for example when we include you in our newsletter.

In these cases we inform you of the purpose of the data processing and your right to revoke your consent.

Data may also be processed on the basis of our legitimate interest (Article 6 | f) GDPR). At the same time, we are required to disclose our interest to you and to balance our interest and your interest.

##### **Routine erasure and blocking of personal data**

The duration of any storage of personal data is determined by the respective statutory retention period or the duration of the business relationship for data not subject to any statutory retention periods. After the end of such period or after the end of the business relationship the corresponding data will be routinely destroyed provided they are no longer required for the fulfilment or negotiation of a contract.

##### **Contract data processing**

Pursuant to Article 28 GDPR we work only with processors who provide adequate guarantees that suitable technical and organisational measures are implemented in such a way that processing complies with the requirements of this Regulation and in a way that ensures the protection of the rights of affected persons.

#### **No automatic decision-making**

As a responsible company, we do not use automatic decision-making or profiling.

#### **Subscribing to our newsletter**

TSI circulates a newsletter in regular intervals informing its existing customers and business partners about events and seminars offered by TSI. Such information is limited to the thematic areas of customers and business partners and applies exclusively to the areas of structured and asset-based finance. Newly interested readers and partners may also register for the newsletter through the TSI website or by email free of charge. When you register through the website the data from the contact form are transmitted to TSI, and when you register by email we store your registration email. In addition to these data, we also capture the date and time of registration. During the registration process the interested person is asked for their consent to the processing of the data and referred to the data protection declaration of TSI. Data supplied in this way are used exclusively for this purpose and neither evaluated for other purposes nor passed on to third parties.

Customers or interested persons may at any time withdraw their consent to the storing of personal data which they have given us for the circulation of the newsletter. Each newsletter contains a link that can be used to withdraw consent. Consent may also be withdrawn by sending a fax, letter or email to the person responsible for data processing.

#### **Joint Controllorship between SVI and TSI**

In accordance with Article 26 of the GDPR, STS Verification International GmbH ("SVI") and True Sale International GmbH ("TSI") entered into an agreement on joint responsibility for data processing which determines their respective responsibilities for compliance with the Regulation (Joint Controller Agreement). This agreement relates in particular to the exercise of your rights and fulfilment of the duties to provide information referred to in Articles 13 and 14 of the GDPR. Irrespective of the terms of the agreement referred to in the previous paragraph, you may exercise your rights under this Regulation in respect of and against each of the controllers. The agreement may be viewed upon request submitted to the responsible person.

#### **Data collection on our website**

##### **How are data collected on this website?**

Data are collected when you provide them to us. These may be data which you enter in a contact form.

Other data are automatically collected by our IT systems when you visit the website. These are primarily technical data such as your internet browser, operating system or the time of your page visit. These data are automatically collected as soon as you enter our website.

##### **Server log files**

The provider of the websites automatically collects and stores information in what are referred to as server log files which your browser automatically sends us. This information is:

- Web browser type and version
- Computer operating system
- Referrer URL
- Host name of the accessing computer

- Timestamp of server request
- IP address

This anonymous information cannot be used to identify a particular user. These data will not be combined with data from other sources. We reserve the right to subsequently verify these data if we become aware of specific indications of unlawful use.

#### Cookies

The webpages of TSI use cookies. Cookies are text files downloaded from a web browser and stored in a computer system.

Cookies do not harm your computer and do not contain any viruses. They are used to make our offer more user-friendly, effective and secure.

The use of cookies enables TSI to provide users of this website with user-friendly services that would not be possible without the use of cookies.

Cookies enable us to optimise the information and offerings on our websites in the interest of the user. As mentioned, cookies enable us to recognise the users of our website. The purpose of this user recognition is to make the use of our website easier. The user of a website that uses cookies, for example, does not have to enter their login data again every time they visit the website because the cookie stored on the user's computer system does this for them.

Most of the cookies we use are so-called 'session cookies.' They are automatically deleted after your visit. Other cookies remain in your device's memory until you delete them. These cookies make it possible to recognise your browser when you next visit the site.

You can configure your browser to inform you about the use of cookies so that you can decide on a case-by-case basis whether to accept or reject a cookie. Alternatively, your browser can be configured to automatically accept cookies under certain conditions or to always reject them, or to automatically delete cookies when closing your browser. Disabling cookies may limit the functionality of this website.

Cookies which are necessary to allow electronic communications or to provide certain functions you wish to use (such as the shopping cart) are stored pursuant to Art. 6 paragraph 1, letter f of the GDPR. The website operator has a legitimate interest in the storage of cookies to ensure an optimised service provided free of technical errors. If other cookies (such as those used to analyse your surfing behaviour) are also stored, they will be treated separately in this privacy policy.

You can configure your browser to disable the storing of cookies from our website at any time and thereby permanently decline the download of cookies. Cookies already downloaded may also be deleted at any time using a web browser or other software. All common web browsers have this functionality. If you disable cookies in your web browser you may not be able to access the full functionality of our website.

#### Contact form

If you submit an enquiry using our contact form, the information and contact details which you enter in the form will be stored in our system for processing and for reference if you have any follow-up enquiries. We will not pass any of this information on without your consent.

The data entered in the contact form will thus be processed exclusively on the basis of your consent (Article 6 1 a) GDPR). You may withdraw this consent at any time. This can be done by sending us an email, which does not need to be in a

set form. The legality of data processing operations performed up to the revocation will remain unaffected by the withdrawal of consent.

The data entered by you in the contact form remain with us until you request us to erase them, withdraw your consent to their storage or the purpose for their storage ceases (e.g. after the processing of your query has been completed). This does not affect mandatory legal provisions, particularly retention periods.

#### Analytics and advertising

##### etracker

Our website uses the etracker analytics service. The service is provided by etracker GmbH, Erste Brunnenstraße 1, 20459 Hamburg, Germany. This data can be used to create pseudonymous usage profiles. Cookies may be used for this purpose. Cookies are small text files stored in your local browser cache. These cookies enable the recognition of your browser. The data collected by the etracker technologies are not used to determine the personal identity of website visitors and are not compiled together with personal data related to the person referred to by the pseudonym unless expressly agreed to by the person concerned.

etracker cookies remain on your device until you delete them.

The storage of etracker cookies is based on Art. 6 (1) (f) GDPR. The website operator has a legitimate interest in analysing user behaviour to optimise both its website and its advertising.

You can object to the collection and storage of your data at any time with future effect. To refuse the collection and storage of your visitor data for the future, you can use the etracker opt-out cookie at the following link. This means that in the future no visitor information will be collected and stored by etracker in your browser: <https://www.etracker.de/privacy?et=V23Jbb>.

Using this functionality will set an opt-out-cookie called 'cntcookie' from etracker. Please do not delete this cookie if you want your refusal to consent to remain valid. For more information, see the etracker privacy policy: <https://www.etracker.com/de/datenschutz.html>.

##### Completion of an outsourced data processing contract

We have entered into an agreement with etracker for the outsourcing of our data processing and fully implement the strict requirements of the German data protection authorities when using etracker.