

PRIVACY POLICY

THE PROTECTION OF YOUR PERSONAL DATA IS OF PARTICULAR IMPORTANCE TO US. WE PROCESS PERSONAL DATA EXCLUSIVELY IN ACCORDANCE WITH THE EU GENERAL DATA PROTECTION REGULATION (DSGVO) AND APPLICABLE NATIONAL DATA PROTECTION REGULATIONS. THIS DATA PROTECTION INFORMATION GIVES YOU AN OVERVIEW OF HOW WE PROCESS YOUR PERSONAL DATA ON OUR WEBSITE AND HOW YOU CAN ASSERT YOUR DATA PROTECTION RIGHTS.

THIS DATA PROTECTION DECLARATION IS INTENDED FOR VISITORS TO OUR WEBSITE WWW.XPRIMIA.COM

1. RESPONSIBILITY AND CONTACT

RESPONSIBILITY FOR DATA PROCESSING LIES WITH:

XPRIMIA AG

IM BESCH26

9494 SCHAAN

FL LIECHTENSTEIN

TEL.: +4237898877

EMAIL: INFO@XPRIMIA.FI

NO DATA PROTECTION OFFICER HAS BEEN APPOINTED, AS THERE IS NO LEGAL NECESSITY. FOR QUESTIONS REGARDING DATA PROTECTION, PLEASE CONTACT: INFO@XPRIMIA.FI

2. PROCESSING PURPOSES AND LEGAL BASES

2.1 CONTACT AND CONTACT FORMS

YOU CAN CONTACT US FOR INQUIRIES ABOUT OUR PROJECTS USING THE AVAILABLE CONTACT FORMS OR BY EMAIL. IN THIS CASE WE PROCESS THE DATA YOU PROVIDE (NAME, EMAIL ADDRESS, MESSAGE) TO PROCESS YOUR INQUIRY. SOME OF THE DATA WE REQUEST IN CONNECTION WITH OUR ABOVE-MENTIONED SERVICES MAY BE MARKED AS MANDATORY FIELDS. YOU ARE NOT OBLIGED TO PROVIDE THIS DATA. WITHOUT PROVIDING THIS INFORMATION, HOWEVER, WE MAY NOT BE ABLE TO PROCESS YOUR INQUIRY OR PROVIDE OUR SERVICES.

THE PROCESSING OF YOUR INQUIRIES AND THE PROVISION OF FURTHER INFORMATION RELATED TO OUR PRODUCTS AND SERVICES, WHICH YOU REQUEST BY TELEPHONE, EMAIL OR VIA OUR CONTACT FORM, IS UNDERTAKEN IN ORDER TO CARRY OUT THESE PRE-CONTRACTUAL MEASURES (ART 6 PARA. 1 LIT B DSGVO).

2.2 TRENDS & INSIGHTS NEWSLETTER

YOU CAN SUBSCRIBE TO OUR TRENDS & INSIGHTS NEWSLETTER TO BE REGULARLY INFORMED ABOUT NEWS, EVENTS AND PROJECT NEWS (ART 6 PARA. 1 LIT A DSGVO). WE PROCESS THE PERSONAL DATA YOU PROVIDE DURING REGISTRATION (NAME, EMAIL, FORM OF ADDRESS, TITLE), AS WELL AS GENERAL STATISTICS ON REACH. YOUR PERSONAL DATA MAY BE TRANSFERRED TO OUR SERVICE PROVIDERS (IT) (AS CONTRACTED PROCESSORS), AS FAR AS THEY ARE NECESSARY FOR THE FULFILMENT OF THE CONTRACT (NEBULA OY).

YOU CAN UNSUBSCRIBE FROM OUR TRENDS & INSIGHTS NEWSLETTER AT ANY TIME USING THE UNSUBSCRIBE LINK INCLUDED IN EVERY TRENDS & INSIGHTS NEWSLETTER. SUCH A REVOCATION OF CONSENT DOES NOT AFFECT THE LEGALITY OF THE PROCESSING UNTIL REVOCATION.

2.3 APPLICATIONS

ON OUR WEBSITE YOU WILL FIND CURRENT JOB OFFERS AND THE CONTACT TO OUR HR TEAM. IF YOU APPLY TO US, WE PROCESS THE DATA YOU PROVIDE (ESPECIALLY NAME, CONTACT DETAILS, CV, LETTER OF APPLICATION, CERTIFICATES AND REFERENCES) IN ORDER TO CONSIDER YOU IN THE RECRUITMENT PROCESS. WE PROCESS YOUR DATA UNTIL THE END OF THE APPLICATION PROCEDURE FOR THE FULFILMENT OF (PRE-)CONTRACTUAL OBLIGATIONS (ART. 6 PARA. 1 LIT B DSGVO) OR, BEYOND THAT, AS LONG AS THERE IS A LEGITIMATE INTEREST (ART. 6 PARA. 1 LIT F DSGVO) IN KEEPING IT (I.E. AT LEAST 7 MONTHS AFTER REJECTION OF AN APPLICATION AS EVIDENCE OF PROCEEDINGS UNDER THE GLBG). WE RETAIN SPECULATIVE APPLICATIONS WITHOUT A CONCRETE REFERENCE TO A CURRENT JOB OFFER FOR UP TO TWO YEARS IN ORDER TO CONSIDER YOUR APPLICATION FOR FUTURE JOB OFFERS.

WITH YOUR CONSENT, WE ALSO KEEP YOUR APPLICATION EVIDENT FOR A PERIOD OF 3 YEARS. YOU HAVE THE RIGHT TO REVOKE YOUR CONSENT AT ANY TIME WITH EFFECT FOR THE FUTURE.

YOU ARE NOT OBLIGED TO PROVIDE YOUR PERSONAL DATA. WITHOUT THE NECESSARY DATA, HOWEVER, WE CANNOT CONSIDER YOUR APPLICATION.

2.4 WEBSITE SECURITY

WE PROCESS PERSONAL DATA TO FACILITATE THE WEBSITE. WHEN ACCESSING THE WEBSITE, YOUR BROWSER AUTOMATICALLY TRANSMITS YOUR CURRENT IP ADDRESS AND OTHER INFORMATION FROM YOUR SYSTEM TO OUR SERVER (E.G. OPERATING SYSTEM USED, BROWSER VERSION). THIS DATA IS REQUIRED TO SEND YOU THE CONTENTS OF OUR WEBSITE AND TO ENSURE THAT THEY ARE DISPLAYED CORRECTLY. FROM THIS ACCESS DATA, OUR SERVER AUTOMATICALLY CREATES PROTOCOLS (LOGS) TO PREVENT ATTACKS BY OVERLOADING THE SERVER OR UNAUTHORIZED ACCESS. WE PROCESS THIS DATA WITHIN THE SCOPE OF OUR LEGITIMATE INTERESTS IN THE PROPER FUNCTIONING AND SECURITY OF OUR WEBSITE (ART 6 PARA. 1 LIT F DSGVO).

2.5 WEB ANALYTICS

IN ORDER TO BETTER UNDERSTAND HOW OUR WEBSITE IS USED AND WHICH CONTENTS WE SHOULD FURTHER DEVELOP, WE USE GOOGLE ANALYTICS TO CREATE ANONYMOUS USAGE STATISTICS. THIS INVOLVES ANALYSES OF THE FOLLOWING FACTORS IN PARTICULAR: NUMBER OF PAGE IMPRESSIONS OF THE INDIVIDUAL SUB-PAGES, GEOGRAPHICAL DISTRIBUTION OF ACCESS, END DEVICES USED BY VISITORS (PC/MOBILE), GENERAL DEMOGRAPHIC ANALYSES. THE COOKIES USED BY GOOGLE ANALYTICS ARE ONLY SET IF YOU GIVE YOUR CONSENT (ART 6 PARA. 1 LIT A DSGVO).

FOR MORE INFORMATION ON HOW GOOGLE ANALYTICS WORKS AND THE INFORMATION WE CAN COLLECT AND ANALYZE, PLEASE VISIT

[HTTPS://SUPPORT.GOOGLE.COM/ANALYTICS/ANSWER/1012034?HL=LTEN&REF_TOPIC=6157800](https://support.google.com/analytics/answer/1012034?hl=LTEN&ref_topic=6157800).

YOU CAN DEACTIVATE THE COLLECTION OF YOUR DATA BY GOOGLE ANALYTICS AT ANY TIME USING THE FOLLOWING LINK: [HTTPS://TOOLS.GOOGLE.COM/DLPAGE/GAOPTOUT/](https://tools.google.com/dlpage/gaoptout/).

FOR MORE INFORMATION ABOUT GOOGLE'S TERMS OF USE AND GOOGLE'S PRIVACY POLICY, PLEASE VISIT THE FOLLOWING LINK: [HTTPS://WWW.GOOGLE.COM/ANALYTICS/TERMS/GB.HTML](https://www.google.com/analytics/terms/gb.html).

2.6 GOOGLE MAPS

GOOGLE MAPS IS USED TO DISPLAY GEOGRAPHICAL INFORMATION IN A USER-FRIENDLY WAY. THIS SERVICE COLLECTS, PROCESSES AND USES DATA ABOUT THE USAGE OF THE MAPS FUNCTIONS BY VISITORS TO THE WEBSITE. FOR MORE INFORMATION ABOUT GOOGLE'S DATA PROCESSING, PLEASE REFER TO THE PRIVACY POLICY AT [HTTP://WWW.GOOGLE.COM/PRIVACYPOLICY.HTML](http://www.google.com/privacypolicy.html). THERE YOU CAN ALSO CHANGE YOUR SETTINGS IN THE PRIVACY CENTER TO MANAGE AND PROTECT YOUR DATA. GOOGLE MAPS WILL ONLY BE INTEGRATED AFTER YOUR CONSENT (ART 6 PARA. 1 LIT A DSGVO).

2.7 COOKIES

THIS WEBSITE USES COOKIES. COOKIES ARE SMALL TEXT FILES THAT ARE STORED ON YOUR DEVICE WHEN YOU VISIT OUR WEBSITE. COOKIES CANNOT ACCESS, READ OR MODIFY OTHER DATA STORED ON YOUR DEVICE. THE FOLLOWING TABLE GIVES AN OVERVIEW OF THE COOKIES USED ON OUR WEBSITE:

COOKIE(S): SESSION

PROVIDER: XPRIMIA

PURPOSE: THIS DATA IS NECESSARY TO MANAGE YOUR CURRENT CONNECTION AND LOGIN STATUS.

STORAGE PERIOD: FOR THE DURATION OF THE CONNECTION

COOKIES: COOKIECONSENT_STATUS

PROVIDER: XPRIMIA

PURPOSE: THIS COOKIE STORES YOUR COOKIE CONSENT. THIS PREVENTS THE COOKIE BANNER FROM APPEARING MORE THAN ONCE.

STORAGE PERIOD: 1 YEAR

COOKIES: GOOGLE ANALYTICS (_GA, _GAT, _GID)

PROVIDER: GOOGLE (FIRST PARTY COOKIE)

PURPOSE: THESE COOKIES ARE USED TO CREATE USAGE STATISTICS OF OUR WEBSITE AND TO CONTROL MULTIPLE INQUIRIES. THIS HELPS US TO FIND OUT HOW OFTEN, FROM WHICH COUNTRIES AND WITH WHICH DEVICES OUR WEBSITE IS ACCESSED AND TO FURTHER OPTIMISE IT.

GOOGLE ANALYTICS COOKIES ARE ONLY SET WITH YOUR CONSENT

(ART 6 PARA. 1 LIT A DSGVO.)

STORAGE PERIOD: 1 MINUTE (_GAT) 1 DAY (_GID) 2 YEARS (_GA)

COOKIES: CSRF_HTTPS-CONTAO_CSRF_TOKEN

PROVIDER: XPRIMIA

PURPOSE: TO ENSURE WEBSITE SECURITY BY PREVENTING CROSS SITE FORGERY REQUESTS (CSRF).

STORAGE PERIOD: FOR THE DURATION OF THE CONNECTION

FOR MORE INFORMATION ABOUT THE COOKIES STORED ON YOUR DEVICE AND HOW TO DISABLE COOKIES, SEE:

[HTTPS://TOOLS.GOOGLE.COM/DLPAGE/GAOPTOUT](https://tools.google.com/dlpage/gaoptout)

[HTTPS://WWW.YOURONLINECHOICES.COM](https://www.youronlinechoices.com)

3. FORWARDING OF YOUR PERSONAL DATA

3.1 NECESSARY FORWARDING

IN ORDER TO PROVIDE OUR SERVICES, DATA MAY BE FORWARDED TO THIRD PARTIES WHO ACT ON OUR BEHALF (ESPECIALLY IT SERVICE PROVIDERS SUCH AS NEBULA, YOUNITED AGENCY, AND TAX CONSULTANTS). YOUR PERSONAL DATA MAY ALSO BE FORWARDED TO THE BUSINESS PARTNERS INVOLVED (ESPECIALLY BANKS, LAWYERS AND NOTARIES) AND TO OUR GROUP COMPANIES WITHIN THE SCOPE OF CONTRACT FULFILMENT AND IN THE XPRIMIA REAL ESTATE GROUP.

3.2 GOOGLE SERVICES (ANALYTICS, MAPS)

IF YOU HAVE AGREED TO OUR USE OF COOKIES, THIS WEBSITE USES GOOGLE ANALYTICS, A WEB ANALYTICS SERVICE PROVIDED BY GOOGLE LLC, 1600 AMPHITHEATRE PARKWAY, MOUNTAIN VIEW, CA 94043, USA (GOOGLE). GOOGLE ANALYTICS USES COOKIES TO ENABLE AN ANALYSIS OF YOUR USE OF THE WEBSITE. THE INFORMATION GENERATED BY COOKIES ABOUT YOUR USE OF OUR WEBSITE (INCLUDING YOUR IP ADDRESS AND THE URLS OF THE WEBSITES YOU VISIT) IS TRANSFERRED TO GOOGLE SERVERS IN THE USA AND STORED THERE. WE DO NOT STORE ANY OF YOUR PERSONAL DATA COLLECTED IN CONNECTION WITH GOOGLE ANALYTICS. GOOGLE LLC IS A COMPANY REGISTERED IN THE PRIVACY SHIELD LIST OF THE US DEPARTMENT OF COMMERCE. THE FOLLOWING CONTRACTUAL OBLIGATIONS TO GUARANTEE DATA PROTECTION APPLY: [HTTPS://WWW.GOOGLE.COM/ANALYTICS/TERMS/DE.HTML](https://www.google.com/analytics/terms/de.html) AND [HTTPS://WWW.GOOGLE.COM/ANALYTICS/TERMS/DPA/DATAPROCESSINGAMENDMENT_20160909.HTML](https://www.google.com/analytics/terms/dpa/dataprocessingamendment_20160909.html).

IF YOU HAVE AGREED TO THE USE OF GOOGLE MAPS, DATA IS AUTOMATICALLY FORWARDED TO GOOGLE. THE INTEGRATION OF GOOGLE MAPS IS NOT AUTOMATIC. IF WE WANT TO INCLUDE GOOGLE MAPS ON A PAGE, YOU MUST AGREE BY CLICKING THE MARKED BUTTON. ONLY THEN WILL A CONNECTION TO THE GOOGLE SERVERS BE ESTABLISHED.

4. STORAGE DURATION

WE STORE THE PERSONAL DATA PROCESSED ABOUT YOU UNTIL THE END OF THE CONTRACTUAL RELATIONSHIP OR FOR AS LONG AS STATUTORY RETENTION OBLIGATIONS EXIST, IN ADDITION FOR AS LONG AS LEGAL CLAIMS CAN BE ASSERTED. FOR THE PROCESSED CONTRACT, BOOKING AND ASSESSMENT DATA, THE RETENTION PERIODS FROM THE AUSTRIAN ENTERPRISE CODE (UGB), THE FEDERAL FISCAL CODE (BAO), THE INCOME TAX ACT (ESTG), THE VALUE ADDED TAX ACT (USTG) AND THE GENERAL CIVIL CODE (ABGB) APPLY IN PARTICULAR.

COMMUNICATION DATA WILL BE PROCESSED UNTIL THE COMPLETION OF YOUR INQUIRY, BEYOND THAT AS FAR AS (PRE-)CONTRACTUAL OBLIGATIONS ARISE FROM IT. THE STORAGE PERIOD OF THE COOKIES USED AND THE STORAGE PERIOD OF APPLICATION DOCUMENTS IS LISTED ABOVE.

5. YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA

IN ACCORDANCE WITH THE STATUTORY PROVISIONS, YOU HAVE THE FOLLOWING RIGHTS IN RELATION TO THE PROCESSING OF YOUR PERSONAL DATA:

RIGHT OF ACCESS, INFORMATION AND CORRECTION UNDER ART 13-16 DSGVO

YOU ARE ENTITLED TO REQUEST INFORMATION ON WHETHER AND HOW WE PROCESS PERSONAL DATA ABOUT YOU AND TO RECEIVE COPIES OF THIS DATA. YOU CAN DEMAND THE CORRECTION OF INCORRECT DATA AT ANY TIME. IF YOUR DATA IS INCOMPLETE, YOU MAY REQUEST THAT IT BE COMPLETED.

RIGHT TO DELETE YOUR PERSONAL DATA IN ACCORDANCE WITH ART 17 DSGVO

YOU ARE ENTITLED TO DEMAND THE IMMEDIATE DELETION OF YOUR PERSONAL DATA FOR THE FOLLOWING REASONS:

YOUR PERSONAL DATA IS NO LONGER NEEDED FOR THE PURPOSES FOR WHICH IT WAS PROCESSED

YOU REVOKE YOUR DATA PROTECTION CONSENT AND THERE IS NO OTHER LEGAL BASIS

YOU OBJECT TO THE PROCESSING AND THERE ARE NO PRIORITY LEGITIMATE REASONS FOR PROCESSING

YOUR PERSONAL DATA WAS PROCESSED UNLAWFULLY

YOUR PERSONAL DATA MUST BE DELETED IN ORDER TO COMPLY WITH LEGAL REQUIREMENTS

RIGHT TO LIMIT THE PROCESSING OF YOUR PERSONAL DATA IN ACCORDANCE WITH ART 18 DSGVO

YOU ARE ENTITLED TO REQUEST A RESTRICTION ON THE PROCESSING OF YOUR PERSONAL DATA FOR THE FOLLOWING REASONS:

YOU CONTEST THE ACCURACY OF YOUR PERSONAL DATA (FOR THE TIME NECESSARY TO ALLOW US TO VERIFY THE ACCURACY OF THE PERSONAL DATA)

THE PROCESSING IS NOT LAWFUL AND INSTEAD OF DELETING THE DATA YOU REQUEST A RESTRICTION OF USE

WE NO LONGER NEED YOUR PERSONAL DATA FOR THE PURPOSES OF PROCESSING, BUT YOU DO NEED IT TO ASSERT, EXERCISE OR DEFEND LEGAL CLAIMS

YOU HAVE LODGED AN OBJECTION (AS LONG AS IT IS NOT YET CLEAR WHETHER OUR LEGITIMATE INTERESTS OUTWEIGH THE OBJECTION)

IF WE HAVE FORWARDED YOUR PERSONAL DATA TO THIRD PARTIES, WE WILL INFORM THEM - IF THIS IS REQUIRED BY LAW - ABOUT YOUR CORRECTION, DELETION OR RESTRICTION OF THE DATA PROCESSING.

RIGHT TO DATA TRANSFERABILITY IN ACCORDANCE WITH ART 20 DSGVO

YOU ARE ENTITLED TO RECEIVE PERSONAL DATA THAT YOU HAVE PROVIDED TO US IN A STRUCTURED, COMMON AND MACHINE-READABLE FORMAT OR TO TRANSFER IT DIRECTLY TO ANOTHER RESPONSIBLE PERSON, AS FAR AS THIS IS TECHNICALLY FEASIBLE.

RIGHT OF OBJECTION UNDER ART 21 DSGVO

IF WE PROCESS YOUR PERSONAL DATA ON THE BASIS OF LEGITIMATE INTERESTS OR IN THE PUBLIC INTEREST, YOU HAVE THE RIGHT TO OBJECT TO THE PROCESSING OF YOUR DATA FOR REASONS ARISING FROM YOUR PARTICULAR SITUATION.

IN CASE OF AN OBJECTION, WE WILL NO LONGER PROCESS YOUR PERSONAL DATA, UNLESS

WE CAN PROVE COMPELLING AND LEGITIMATE GROUNDS FOR PROCESSING WHICH OUTWEIGH YOUR INTERESTS, RIGHTS AND FREEDOMS OR

THE PROCESSING SERVES THE ASSERTION, EXERCISE OR DEFENCE OF LEGAL CLAIMS. RIGHT TO REVOKE A DATA PROTECTION CONSENT

IF WE PROCESS YOUR PERSONAL DATA ON THE BASIS OF YOUR CONSENT UNDER DATA PROTECTION LAW, YOU HAVE THE RIGHT TO REVOKE THIS CONSENT AT ANY TIME WITHOUT GIVING REASONS. THE REVOCATION DOES NOT AFFECT THE LEGALITY OF THE PROCESSING UNTIL REVOCATION.

NO AUTOMATED DECISION MAKING ACCORDING TO ART 22 DSGVO

WE DO NOT PROCESS YOUR PERSONAL DATA FOR THE PURPOSE OF MAKING DECISIONS BASED SOLELY ON AUTOMATED PROCESSING, INCLUDING PROFILING, AND WHICH HAVE LEGAL EFFECT ON YOU.

YOUR RIGHT OF OBJECTION UNDER ART 77 DSGVO

YOU ARE ENTITLED TO LODGE A COMPLAINT WITH THE RESPONSIBLE SUPERVISORY AUTHORITY
- FOR AUSTRIA: ÖSTERREICHISCHE DATENSCHUTZBEHÖRDE (WWW.DSB.GV.AT)

IF YOU HAVE ANY QUESTIONS OR CONCERNS REGARDING THE PROCESSING OF YOUR
PERSONAL DATA, PLEASE CONTACT US:

XPRIMIA AG

IM BESCH 26

9494 SCHAAN

FL - LIECHTENSTEIN

TEL.: +4237898877

E-MAIL: INFO@XPRIMIA.FI

WWW.XPRIMIA.COM

6. CHANGES TO THIS DATA PROTECTION INFORMATION

AS THE INTERNET CONTINUES TO DEVELOP, WE WILL ALSO CONTINUALLY ADAPT THIS DATA PROTECTION INFORMATION TO KEEP IT UP TO DATE. WE WILL ANNOUNCE ANY CHANGES ON THIS WEBSITE IN A TIMELY MANNER. YOU SHOULD THEREFORE REGULARLY REVIEW THIS DATA PROTECTION POLICY IN ORDER TO BE INFORMED ABOUT THE CURRENT STATUS.

LAST UPDATED: DECEMBER 2020