

## Information letter for the use of video conferencing tools

In the following, we would like to inform you about the processing of personal data in connection with the use of "video conferencing tools". Depending on the purpose of the tools, we may use the personal data collected for the following purposes:

- Conducting telephone and video conferences
- Conducting online meetings
- Conducting webinars

In the following, we will inform you in detail about the processing of personal data and your rights.

### § 1 Details of the person responsible

The controller within the meaning of data protection laws, in particular the EU General Data Protection Regulation (GDPR), is

**Freudenberg SE**

Hoehnerweg 2-4

69469 Weinheim

E-mail: info[at]freudenberg.com

*If you access the "Teams" or "Zoom" website, the provider of "Teams" or "Zoom" is responsible for data processing. However, accessing the website is only necessary for the use of "Teams" or "Zoom" in order to download the respective software. You can also use "Teams" or "Zoom" if you enter the respective meeting ID and any other access data for the meeting directly in the respective app. If you do not want to or cannot use the "Teams" or "Zoom" app, the basic functions can also be used via the browser versions, which you can also find on the "Teams" or "Zoom" website.*

### § 2 Details of the DPO

You can reach our data protection officer at

**activeMind.legal Rechtsanwaltsgesellschaft m. b. H.**

Potsdamer Street 3

80802 Munich

Phone: +49 89 919294-900

E-mail: dataprotection-support[at]freudenberg.com

### § 3 Your rights as a data subject

You can exercise the following rights at any time using the contact details provided:

- Information about your data stored by us and its processing (**Art. 15 GDPR**),
- Correction of incorrect personal data (**Art. 16 GDPR**),
- Deletion of your data stored by us (**Art. 17 GDPR**),
- Restriction of data processing if we are not yet allowed to delete your data due to legal obligations (**Art. 18 GDPR**),
- Objection to the processing of your data by us (**Art. 21 GDPR**) and
- Data portability, provided that you have consented to the data processing or have concluded a contract with us (**Art. 20 GDPR**).

If you have given us your consent, you can revoke it at any time with effect for the future. You can lodge a complaint with a supervisory authority at any time, e.g. with the competent supervisory authority in the federal state of your place of residence or with the authority responsible for us as the controller.

A list of supervisory authorities (for the non-public sector) with addresses can be found here: [List of supervisory authorities.](#)

## § 4 Information about your right to object in accordance with Art. 21 GDPR

### Individual right of objection

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on point (f) of Article 6(1) GDPR (data processing on the basis of a balancing of interests); this also applies to profiling based on this provision within the meaning of Article 4(4) GDPR.

If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves the establishment, exercise or defence of legal claims

### Recipient of an objection

The objection can be sent informally with the subject "Objection", stating your name, address or other identifying features, to the contact information given above.

## § 5 Use of video conferencing tools

**(1) Type and purpose of processing:** We use the tools to conduct telephone conferences, online training courses, video conferences and/or webinars (hereinafter referred to as "online meetings"). "Teams" is a service of Microsoft Corporation, which is based in the USA. "Zoom" is a service provided by Zoom Video Communications Inc. which is also based in the USA.

Various types of data are processed when using "Teams". The scope of the data also depends on the data you provide before or when participating in an "online meeting".

The following personal data is subject to processing:

- **User details:** first name, surname, telephone (optional), e-mail address, password (if "single sign-on" is not used), profile picture (optional), department (optional)
- **Meeting metadata:** Topic, description (optional), participant IP addresses, device/hardware information
- **For recordings (optional):** MP4 file of all video, audio and presentation recordings, M4A file of all audio recordings, text file of the online meeting chat.
- **When dialling in with the telephone:** information on the incoming and outgoing phone number, country name, start and end time. If necessary, further connection data such as the IP address of the device can be saved.
- **Text, audio and video data:** You may have the opportunity to use the chat, question or survey functions in an "online meeting". In this respect, the text entries you make are processed in order to display them in the "online meeting" and, if necessary, to log them. In order to enable the display of video and the playback of audio, the data from the microphone of your end device and from any video camera of the end device will be processed accordingly for the duration of the meeting. You can switch off or mute the camera or microphone yourself at any time via the "Teams" applications.

To take part in an "online meeting" or to enter the "meeting room", you must at least enter your name.

Various types of data are processed when using "Zoom". The scope of the data also depends on the data you provide before or when participating in an "online meeting".

A detailed list of the categories of data collected and processed by Zoom, as well as the respective exact purpose of the processing, can be found at <https://zoom.us/privacy>.

Zoom offers administrators the opportunity to make extensive data protection settings. We configure the tool in such a way that only the personal data required to organise the online event is processed and the data collected is protected in the best possible way.

If it is necessary for the purposes of logging the results of an online meeting, we will log the chat content. However, this will not usually be the case.

Automated decision-making within the meaning of Art. 22 GDPR is not used.

- (2) Legal basis:** Insofar as personal data of employees of the Freudenberg Group are processed, Art. 6 para. 1 lit. b) GDPR is the legal basis for data processing. If, in connection with the use of "Teams", personal data is not required for the establishment, implementation or termination of the employment relationship, but is nevertheless an elementary component of the use of "Teams", Art. 6 para. 1 lit. f) GDPR is the legal basis for data processing. In these cases, our interest lies in the effective organisation of "online meetings".

In addition, the legal basis for data processing when conducting "online meetings" is Art. 6 para. 1 lit. b) GDPR, insofar as the meetings are conducted within the framework of contractual relationships.

If there is no contractual relationship, the legal basis is Art. 6 para. 1 lit. f) GDPR. Here too, we have an interest in the effective organisation of online meetings.

In the event that a meeting is to be recorded, the legal basis is Art. 6 para. 1 lit. a) GDPR. You can withdraw your consent at any time.

- (3) Recipients:** Personal data that is processed in connection with participation in "online meetings" is generally not passed on to third parties unless it is intended to be passed on. Please note that content from "online meetings", as with face-to-face meetings, is often used to communicate information with customers, interested parties or third parties and is therefore intended to be passed on.

Other recipients: The providers of "Teams" (Microsoft Ireland Operations Limited) and "Zoom" (Zoom Video Communications, Inc., 55 Almaden Blvd, Suite 600, San Jose, CA 95113.) necessarily receive knowledge of the above-mentioned data, insofar as this is provided for in our order processing contract with "Teams" or "Zoom".

Further information can also be found in [Zoom's privacy policy](#) and in [Teams' privacy policy](#).

- (4) Third country transfer:** "Teams" and "Zoom" are services provided by providers from the USA. Personal data may therefore also be processed in a third country. An adequate level of data protection is guaranteed by the conclusion of the so-called EU standard contractual clauses with the providers.
- (5) Storage period:** We generally delete personal data when there is no need for further storage. A requirement may exist in particular if the data is still needed to fulfil contractual services, to check and grant or defend against warranty and guarantee claims. In the case of statutory

retention obligations, deletion will only be considered after expiry of the respective retention obligation.

In the case of recordings, these are only stored for as long as the intended purpose and your consent are given.

- (6) Provision mandatory or required:** The provision of your personal data is voluntary. If you have concluded a contract with us, the provision of this data is required. Without the personal data, we will not be able to organise the online meetings.
- (7) Objection:** Please read the information on your right to object in Section 4 of this Privacy Policy (above).