

# Privacy Notice

## 1. Introduction

We would like to use the information below to provide you "data subject" with an overview of our processing of your personal data and your rights under data protection law. It is generally possible to use our website without entering personal data. However, if you wish to make use of special services offered by our company through our website, it may be necessary to process personal data. If it is necessary to process personal data and there is no legal basis for such processing, we will generally obtain your consent.

Personal data, such as your name, address or email address, is always processed in accordance with the EU General Data Protection Regulation (GDPR) and in accordance with the country-specific data protection regulations applicable to the "Wolfes & von Etdorf Assecuranzbureau OHG". The aim of this Privacy Notice is to inform you about the scope and purpose of the personal data we collect, use and process.

As the data controller, we have implemented numerous technical and organisational measures to ensure the most complete possible protection of the personal data processed via this website. Nevertheless, as a rule, internet-based data transmissions may have security gaps, and we are unable to guarantee absolute protection. Because of this, you are free to send us personal data by alternative means, for example by telephone or post.

## 2. Data controller

The data controller, as defined by the GDPR, is:

Wolfes & von Etdorf Assecuranzbureau OHG  
Oberhafenstr. 1, 20097 Hamburg, Germany

Phone: +49 (0) 40 3397 130  
Fax: +49 (0) 40 3397 1323

Email: [info@wve-hh.de](mailto:info@wve-hh.de)

Data controller's representative: Frau Friederike von Etdorf, Herr Hans-Ulrich von Etdorf

## 3. Data protection officer

You can reach the data protection officer as follows:

Matthias Schütz

Phone: +49 (0) 5221 87292-10  
Fax: +49 (0) 5221 87292-49  
Email: [datenschutz@wve-hh.de](mailto:datenschutz@wve-hh.de)

You may contact our data protection officer directly at any time if you have any questions or suggestions regarding data protection.

## 4. Legal basis for processing

Article 6 Paragraph 1(a) GDPR serves as our company's legal basis for processing operations in which we obtain consent for a specific processing purpose.

If the processing of personal data is necessary for the performance of a contract to which you are a party, as is the case, for example, with processing operations that are necessary for the delivery of goods or the provision of other services or consideration, processing is based on Article 6 Paragraph 1(b) GDPR. The same applies to those processing operations required to carry out pre-contractual measures, such as in cases of queries regarding our products or services.

If our company is subject to a legal obligation requiring the processing of personal data, such as for the fulfilment of tax obligations, processing is based on Article 6 Paragraph 1(c) GDPR.

In rare cases, processing of personal data may be necessary to protect the vital interests of the data subject or of another natural person. This would be the case, for example, if someone visiting our business were to be injured and their name, age, health insurance data or other vital information needed to be disclosed to a doctor, hospital or other third party. Processing would then be based on Article 6 Paragraph 1(d) GDPR.

Finally, processing operations could be based on Article 6 Paragraph 1(f) GDPR. Processing operations not based on any of the above-mentioned legal bases may be carried out on the basis of Article 6 Paragraph 1(f) GDPR if processing is necessary to safeguard the legitimate interests of our company or those of a third party, provided the interests and fundamental rights and freedoms of the data subject do not take precedence. We are permitted to engage in such processing operations in particular because they have been specifically mentioned in European law. In this respect, the legislature took the view that a legitimate interest could be assumed if you are a customer of our company (Recital 47 Sentence 2 GDPR).

## 5. Technology

### 5.1 SSL/TLS encryption

This site uses SSL or TLS encryption to **ensure** the security of data processing and to protect the transmission of confidential content, such as orders, login details or contact requests that you send to us as the website operator. You can recognise an encrypted connection by your browser's address bar reading "https://" instead of "http://" and the lock symbol in the browser bar.

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

### 5.2 Data collection when visiting the website

If you only use our website for informational purposes, i.e. if you do not register or otherwise provide us with information, we only collect the data your browser sends our server (in what is known as "server log files"). Our website collects a range of general data and information each time you access a website or an automated system. This general data and information is stored in the server's log files. The browser

1. types and versions used,
2. the operating system used by the accessing system,
3. the website from which an accessing system accesses our website (called a referrer),
4. the sub-pages accessed via an accessing system on our website,
5. the date and time the website is accessed,
6. a truncated internet protocol address (anonymised IP address) and
7. the accessing system's internet service provider may be collected.

No conclusions are drawn about you when using this general data and information. Instead, this information is needed

1. to properly deliver our website content,
2. to optimise the content of our website as well as to advertise it,
3. to ensure the continued functioning of our IT systems and our website's technology
4. as well as to provide the information necessary for law enforcement authorities to prosecute in the event of a cyber attack.

This collected data and information is therefore statistically analysed and further analysed by us with the aim of increasing data protection and data security within our company to ultimately ensure an optimum level of protection for the personal data being processed by us. The anonymous data from the server log files is stored separately from all personal data provided by a data subject.

The legal basis for data processing is Article 6 Paragraph 1 Sentence 1(f) GDPR. Our legitimate interest is based on the purposes listed above for the collection of data.

## **6. Your rights as a data subject**

As a company, we not only process personal data on our website, but also through many other processes. In order to be able to give you, the data subject, as much detailed information as possible on these processing purposes, we have compiled information for the following processing activities here, thereby meeting our legal duty to inform under Articles 12 to 14 GDPR:

- Privacy information: clients, potential clients, service providers, suppliers (direct collection pursuant to Article 13 GDPR) (Verlinkung Dok. 1)
- Privacy information: communication partners, contact persons (Verlinkung Dok. 2)
- Privacy information: applicants (Verlinkung Dok. 3)

If you need further information that you are unable to find here and in the detailed Privacy Notice below, please request this in confidence from our data protection officer.

### **6.1 Right to confirmation**

You have the right to request confirmation from us as to whether personal data relating to you will be processed.

### **6.2 Right to information (Article 15 GDPR)**

You have the right to obtain information about the personal data stored about you at any time, free of charge, as well as the right to access a copy of such data from us.

### **6.3 Right to rectification (Article 16 GDPR)**

You have the right to request the immediate rectification of incorrect personal data relating to yourself. Furthermore, the data subject has the right to request the completion of incomplete personal data, taking into account the purposes of the processing.

### **6.4 Erasure (Article 17 GDPR)**

You have the right to request that we erase your personal data, provided one of the reasons stipulated by law applies and if processing is not necessary.

### **6.5 Restriction to processing (Article 18 GDPR)**

You have the right to request that we restrict the processing of your data if one of the legal requirements is met.

## **6.6 Data transferability (Article 20 GDPR)**

You have the right obtain personal data relating to you that you provided us in a structured, commonly used and machine-readable format. You also have the right to transfer this data to another controller without hindrance by us, to whom the personal data was provided, provided that the processing is based on the consent pursuant to Article 6 Paragraph 1(a) GDPR or Article 9 Paragraph 2(a) GDPR or on a contract pursuant to Article 6 Paragraph 1(b) GDPR, and the data are processed using automated procedures, unless processing is necessary to complete a task, is in the public interest or is carried out in the exercise of an official authority assigned to us.

Furthermore, when exercising your right to data transferability pursuant to Article 20 Paragraph 1 GDPR, you have the right to have personal data transferred directly from one controller to another, provided this is technically feasible and does not impede the rights and freedoms of other persons.

## **6.7 Objection (Article 21 GDPR)**

You have the right to lodge an objection to the processing of personal data relating to you for reasons relating to your particular situation where this is done on the basis of Article 6 Paragraph 1(e) (data processing in the public interest) or (f) (data processing on the basis of the weighing of legitimate interests) GDPR.

This also applies to profiling based on these provisions pursuant to Article 4 Number 4 GDPR.

Should you lodge an objection, we will no longer process your personal data unless we can demonstrate compelling and legitimate reasons for such processing that outweigh your interests, rights and freedoms, or where processing serves the assertion, exercise or defence of legal claims.

In individual cases, we process your personal data for direct marketing purposes. You have the right to object at any time to the processing of personal data for the purpose of such advertising. This also applies to profiling where this is connected to this kind of direct marketing. Should you object to the processing of your data for direct marketing purposes, we will no longer process your personal data for this purpose.

In addition, you have the right to object to our processing of your personal data for scientific or historical research purposes or for statistical purposes pursuant to Article 89 Paragraph 1 GDPR for reasons arising from your particular situation, unless such processing is necessary for the performance of a task in the public interest.

You are free to exercise your right to lodge an objection in relation to the use of information society services, Directive 2002/58/EC notwithstanding, by means of automated procedures using technical specifications.

## **6.8 Revocation of consent regarding data protection**

You have the right to revoke any consent to the processing of personal data at any time with future effect.

## **6.9 Lodging a complaint with a supervisory authority**

You have the right to complain to a supervisory authority responsible for data protection about our processing of personal data.

## **7. Version and amendments to the Privacy Notice**

This Privacy Notice is currently valid and was last updated on September 2022.

It may be necessary for us to amend this Privacy Notice in the process of further developing our website and the services we offer through our website or due to changes in legal or regulatory requirements. You can view and print our current Privacy Notice on the website at any time by visiting "<https://www.wve-hh.de/datenschutz>".

This privacy statement has been prepared with the assistance of the privacy software: audatis MANAGER.