

Privacy statement IP-Gateway II

I. General

1 Personal data (Art. 4 No. 1 GDPR)

1.1 The subject of data protection is personal data (hereafter also data). This is all information relating to an identified or identifiable natural person. These include i. e. information such as name, address, occupation, e-mail address, health status, wages, marital status, genetic features, telephone number and possibly also user data such as the IP address.

The extent to which personal data is processed when using the gateway depends largely on which solution has been chosen for call switching and device management. Here two versions must be distinguished:

- ✓ the expansion level LAN (direct communication and management of the devices within a delimited private network) as well as
- ✓ the expansion level WAN (direct communication of the devices via the my sks server infrastructure by SKS).

1.2 The person responsible (Art. 4 No. 7 GDPR)

The person responsible for the processing of your personal data when using and operating the products IP gateway II Family or IP gateway II Business (hereinafter together "IP gateway") are the SKS-Kinkel Elektronik GmbH (hereinafter operator or person responsible). The contact details are SKS-Kinkel Elektronik GmbH, Im Industriegebiet 9, 56472 Hof, tel: 02661-98088102, fax: 02661-98088200, e-mail: info@sks-kinkel.de

1.3 Data protection officer

The entity responsible have appointed an external data protection officer, who can be reached under the e-mail address dsb@sks-kinkel.de.

1.4 Possibility to object

If you want to object to the processing of your data by the operator in full or or for individual measures in accordance with this privacy statement, you can do so using the contact details given in the legal notice. Please note that, in the event of such an objection, the use of the website and the retrieval of the services offered on it may only be possible to a limited extent or not at all.

2 Scope and purpose of data processing, legal basis, provision of data and duration of storage

2.1 Initial setup

During the initial set-up, the unique device number of the device is recorded for later license assignment.

The admissibility of the processing is based on Art. 6 Para. 1 b) GDPR, according to which the processing is lawful if it is necessary to fulfil a contract, a party of which is the affected person, or to perform pre-contractual measures on request of the affected person. The set-up is performed on demand of the affected person.

Providing the data is mandatory for the use of the IP gateway. Without this provision, the IP gateway cannot be used.

The personal data collected for the purpose of initial set-up will be deleted, unless the person responsible has a legitimate interest in further storage. In any case, only the data will still be stored which is actually required to achieve the respective purpose. As far as possible, the personal data will be anonymised.

2.2 Open the **my sks** portal

With every access to **my sks** user data is transmitted and saved in protocol files (server logfiles).

For this the privacy statement of **my sks** applies.

2.3 Registration

As part of the registration, you log on to a push notification server with a static (not user-specific) device-specific key. Furthermore, the user requests access to the **my sks** portal by entering his email address. The use of the portal is regulated solely by the terms of use and the privacy statement of **my sks**.

2.4 Usage

To use the IP gateway, an interaction with the **my sks** services and the connected end devices is necessary. Here personal data of the user as well as of other persons are processed. This involves data in the form of image and sound sequences (voice) as well as control data for the intercom.

Depending on the respective end device the data communication (image/sound data) might be unencrypted.

The admissibility of the processing is based on Art. 6 Para. 1 b) GDPR, according to which the processing is lawful if it is necessary to fulfil a contract, a party of which is the affected person, or to perform pre-contractual measures on request of the affected person. The set-up is performed on demand of the affected person.

The provision of the data is mandatory for the use of the IP gateway. Without this provision, the IP gateway cannot be used.

The admissibility of this processing is based on Art. 6 Para. 1 f) GDPR, according to which the processing is lawful if it is necessary to preserve the legitimate interests of the person responsible or a third party, unless the interests or fundamental rights and freedoms of the affected person prevail, which requires the protection of personal data. The legitimate interest of the operator lies in the provision of the functions of the IP gateway II.

The personal data collected for the purpose of use will be deleted, unless the person responsible has a legitimate interest in further storage. In any case only the data will still be stored that is actually required to achieve the respective purpose. As far as possible, the personal data will be anonymised.

3 Right of access, to rectification, erasure, restriction, objection and data portability

3.1 Right of access (Art. 15 GDPR)

Upon request, the operator will provide you with information as to whether he is processing data relating to you. The operator strives to process requests for information quickly.

3.2 Right to rectification (Art. 16 GDPR)

You have the right to request the person responsible to rectify any incorrect personal data relating to you without delay.

3.3 Right to erasure (Art. 17 GDPR)

You have the right to demand from the operator that personal data concerning you be deleted immediately, and the operator is obliged to delete personal data immediately, provided one of the reasons mentioned in Art. 17 Paragraph 1 a) -f) GDPR applies.

3.4 Right to restriction (Art. 18 GDPR)

You have the right to request the operator to restrict processing if one of the requirements of Art. 18 Para. 1 a) -d) GDPR is met

3.5 Right to objection (Art. 21 GDPR)

You have the right, for reasons that arise from your particular situation, to object at any time to the processing of personal data relating to you, which is based on Art. 6 Paragraph 1 e) or f) GDPR; this also applies to profiling based on these provisions. The operator no longer processes your personal data, unless he can prove compelling legitimate reasons for the processing that outweigh your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

If your personal data is processed in order to operate direct advertising, you have the right to object at any time to the processing of personal data concerning you for the purpose of such advertising; this also applies to profiling insofar as it is associated with such direct advertising.

You have the right, for reasons that arise from your particular situation, to object to the processing of personal data concerning you that is carried out for scientific or historical research purposes or for statistical purposes in accordance with Art. 89 (1) GDPR unless the processing is necessary to fulfil a task in the public interest.

Please use the contact address given in the legal notice for your message.

3.6 Right to data portability (Art. 20 GDPR)

You have the right to receive the personal data relating to you that you have provided to the operator in a structured, common and machine-readable format, and you have the right to transfer this data to another person responsible without hindrance from the operator who was provided the personal data as long as the processing is based on consent in accordance with Art. 6 Paragraph 1 a) GDPR, Art. 9 Paragraph 2 a) GDPR or on a contract in accordance with Art. 6 Paragraph 1 b) GDPR and the processing is carried out in automated procedures.

4 Revocation of your consent

If you have given your consent to the processing of your personal data and revoke it, the processing carried out up to the time of this revocation remains unaffected.

5 Right to object

You have the right to complain to the responsible supervisory authority at any time.

6 Recipient

The data collected when using the IP gateway is transmitted to the server of the responsible party and stored there. In addition, your data can be passed on to the following categories of recipients:

- ✓ Persons at the responsible party who are involved with the processing (e.g. marketing department, personnel administration, customer service, secretariat)
- ✓ Processors (e.g. data center, IT service provider, software support)
- ✓ Contractual partners of the operator (e.g. shipping service provider, banks, tax consultant)
- ✓ Public bodies (e.g. authorities in the event of a judicial decision)

7 Third party links

When using the IP gateway, content that is linked to the services of third parties might be displayed. The operator has neither access to the functions that are provided by third parties, nor can the operator control them. Such third-party services are not subject to the operator's data protection regulations.