

## **Information on Data Processing in Connection with the Social Media Services of Biologische Heilmittel Heel GmbH**

Biologische Heilmittel Heel GmbH, Dr. Reckeweg-Straße 2–4, 76532 Baden-Baden (“Heel,” “we,” or “us”), operates various social media platforms. Below you will find information regarding the nature and scope of the processing of your personal data on these social media platforms in accordance with Art. 13 of the GDPR. You will also find information regarding the key provisions of the agreement we have entered into with the companies listed below, including regarding joint controller status, if applicable, within the meaning of Art. 26 of the GDPR.

### **I. Name and contact details of the controller; contact details of the data protection officer**

(1) Unless otherwise indicated in this privacy notice, the name and contact details of the controller are generally:

Biologische Heilmittel Heel GmbH  
Dr.-Reckeweg-Str. 2-4  
76532 Baden-Baden  
Email: [info@heel.de](mailto:info@heel.de)

(2) Contact information for Heel’s Data Protection Officer:

Heel Biological Remedies GmbH  
Data Protection Officer  
Dr.-Reckeweg-Str. 2-4  
76532 Baden-Baden  
Email: [datenschutz@heel.de](mailto:datenschutz@heel.de)

### **II. Meta Services (Facebook Fan Pages; Instagram Page)**

Heel uses the Facebook fan pages (“Facebook page”) and the Instagram presence (“Instagram page”), utilizing the online platforms of Meta Platforms Ireland Ltd. (formerly Facebook Ireland Ltd.), Merrion Road, Dublin 4, D04 X2K5, Ireland (“Meta”); Parent company: Meta Platforms, Inc. (formerly: Facebook Inc.), 1 Hacker Way, Menlo Park, CA 94025, USA. The Facebook and Instagram pages are merely supplementary offerings. Heel provides interested parties with alternative information and communication channels (such as Heel’s general corporate website).

Heel and Meta Platforms Ireland Ltd. are partially separate with regard to data processing in connection with the aforementioned Meta services (see Section II.1 regarding data processing under Meta’s sole responsibility, and Section II.3 regarding data processing under Heel’s sole responsibility), but are also jointly responsible in certain areas within the meaning of Article 4(7) of the GDPR (see Section II.2). For the areas where joint responsibility applies, Heel has entered into an agreement with Meta regarding joint processing under data protection law (the so-called “Page Insights Addendum”). You can access the agreements at:

[https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum)

In the following, we would like to inform you about which personal data is processed by Meta and Heel and how responsibility under data protection law is distributed between them:

## 1. Data processing by Meta for Meta services (Facebook, Instagram)

When you visit Meta services such as Facebook or Instagram, Meta collects information from you on its own responsibility, as explained in detail in the following Meta documents:

- Meta Data Policy
  - for Facebook and Instagram: <https://www.facebook.com/privacy/policy> (in particular the section “What information do we collect?”)
- Terms of Service
  - for Facebook: <https://www.facebook.com/legal/terms>
  - for Instagram: [https://help.instagram.com/581066165581870/?helpref=hc\\_fnav](https://help.instagram.com/581066165581870/?helpref=hc_fnav)
- Cookie Policy
  - For Facebook: <https://www.facebook.com/policies/cookies>
  - For Instagram: [https://help.instagram.com/1896641480634370/?helpref=hc\\_fnav](https://help.instagram.com/1896641480634370/?helpref=hc_fnav)
- Page settings for your own account (if available):
  - For Facebook: <https://www.facebook.com/settings>
  - For Instagram: [https://www.instagram.com/accounts/privacy\\_and\\_security/](https://www.instagram.com/accounts/privacy_and_security/)

Meta therefore also collects information about how you use Meta services such as Heel Facebook pages and Heel Instagram pages, for example

- the actions you and others take and the content you and others provide, such as the information and content you provide (e.g., when communicating), networks and connections (e.g., information about people, accounts, hashtags), your usage (e.g., types of content you view or interact with), and activities of others, as well as information provided by you about yourself (e.g., photos, comments, etc.);
- Device information, such as device attributes (e.g., operating system, hardware and software, etc.), device operations (e.g., window position, mouse movements, etc.), identifiers (e.g., device IDs), device signals (e.g., Bluetooth, Wi-Fi, etc.), data from device settings (e.g., GPS, camera, photos), network and connections (e.g., mobile carrier name, language, time zone, IP address, etc.), as well as cookie data (see the separate Cookie Policy at <https://www.facebook.com/policies/cookies/>) and
- information from partners (e.g., advertisers, app developers and publishers, etc.), to the extent that they use Meta Business Tools, such as social plugins (like the “Like” button), Facebook Login, etc.

Meta generally carries out this processing on its own responsibility.

## 2. Joint responsibility between Meta and Heel on Facebook Pages

Meta also uses some of this information to provide analytics services (“Page Insights”) to operators of Facebook Pages, so that they can gain insights into how people interact with their Pages and content. Page Insights are aggregated statistics generated based on specific events (so-called “events”) that are logged by Meta’s servers when you interact with pages and content. Such events consist of various data points, which, depending on the specific event, may include, for example:

- an action, e.g.,
  - viewing a page, a post, a video, a story, or other content associated with a page;
  - interacting with a story;
  - subscribing to or unsubscribing from a page;
  - marking a page or post with “Like” or “Unlike”;
  - recommending a Page in a post or comment;
  - comment on, share, or react to a page post (including the type of reaction);
  - hide a page post or report it as spam;
  - hover over a link to a page or a page’s name or profile picture to see a preview of the page’s content;
  - click the website, phone number, “Get Directions” button, or any other button on a Page;
  - view a page’s event, react to an event (including the type of reaction), or click on a link for event tickets;
  - start a Messenger conversation with the Page;
  - View or click on items in a page’s shop;
- Information about the action, the person who performed the action, and the browser/app used for it, e.g.:
  - Date and time of the action;
  - Country/city (estimated based on the IP address or, for logged-in users, imported from the user profile);
  - Language code (from the browser’s HTTP header and/or language settings);
  - Age/gender group (from the user profile, only for logged-in users);
  - Previously visited websites (from the browser’s HTTP header);
  - Whether the action was performed on a computer or a mobile device (from the browser user agent or app attributes);
  - Facebook user ID (only for logged-in users).

Meta uses cookies to determine whether you are a logged-in Facebook user. For information on Meta's use of Facebook cookies, please visit:

<https://www.facebook.com/policies/cookies/>

Meta and Heel share joint responsibility within the meaning of Art. 26 of the GDPR to the extent that you visit a Heel Facebook page and, through an interaction with the Heel Facebook page or the associated content, trigger the creation of an event for Heel Page Insights that contains personal data:

The events that Facebook logs to generate Page Insights are determined exclusively by Facebook and cannot be set up, modified, or otherwise influenced by Heel. Heel does not have access to your personal data processed in the context of events, but only to the aggregated Page Insights. Meta provides us with the information collected by Meta in the form of aggregated, anonymized data, which we can use to evaluate how users interact with our Facebook pages.

This processing of personal data is subject to the joint controller agreement between Meta and Heel. You can view the contents of these agreements at

[https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum) ("Information on Page Insights"). A summary for you can be found at

[https://www.facebook.com/legal/terms/information\\_about\\_page\\_insights\\_data](https://www.facebook.com/legal/terms/information_about_page_insights_data)

Explicitly excluded from this joint responsibility are other processing operations, such as when you visit other Facebook Pages or when events do not trigger Page Insights from Heel.

### 3. Data Processing by Heel on Meta Services (Facebook Pages; Instagram Pages)

In connection with the operation of the Heel Facebook and Instagram pages, Heel processes personal data for the following purposes:

- Exchange and communication, in particular responding to user comments and/or posts published on our Facebook or Instagram pages, responding to personal messages sent to us via our Facebook or Instagram pages, Facebook Messenger, or other communication channels, as well as interacting with third parties (sharing content from third-party pages, liking and tagging these pages); If you have a Facebook or Instagram account and use it to communicate with us, we may also use the public information you have provided yourself as " " and that Meta makes available to us during communication (such as your name and gender to address you personally).
- User Analytics on Instagram (anonymous data only): Meta also provides us with anonymized statistical data about visitors to our Instagram page through its "Insights" service. To do this, Meta stores a cookie on your device when you visit our Instagram page. If you are logged in as an Instagram user, this cookie may be linked to your user account. If you use Instagram on multiple devices, data collection and analysis may also occur across devices. Meta provides us with the information it collects in the form of aggregated, anonymized data, which we use to analyze how users interact with our Instagram page. We do not have access to the data underlying these analyses. We use the information provided to us by Meta in this way to

optimize the content and features of our Instagram page and to provide you with content and interest-based advertisements relevant to you, without directly obtaining knowledge of your identity as a visitor.

Our processing of personal data via our Facebook and Instagram pages is based on our overriding legitimate interests in effective communication with users of our Facebook pages, for corporate presentation and communication, for user analysis, and for marketing purposes in accordance with Article 6(1)(f) of the GDPR. We use the information provided to us by Meta to optimize the content and features of our Facebook pages and to provide you with content relevant to you and interest-based advertisements without directly obtaining knowledge of your identity as a visitor. This constitutes our legitimate interests.

We do not store your personal data outside of the social media accounts and, even there, only for as long as is necessary for the purposes of processing. Personal data will be deleted by or its processing restricted as soon as the purpose of the processing has been fulfilled or ceases to apply (for example, once a request has been conclusively answered), unless legal, contractual, or statutory requirements mandate the retention of the data.

#### 4. Disclosure of Your Data; Transfers to Third Countries

##### 4.1 Disclosure of Data by Heel to Third Parties

Unless otherwise explained in this section, we generally do not disclose your data to third parties. In some cases, we use external service providers to process personal data within the framework of commissioned processing pursuant to Art. 28 of the GDPR, who assist us with technical issues, customer communication within individual projects, or the maintenance of our social media accounts in accordance with our instructions. These service providers are located in the EU, are carefully selected and commissioned by us, and are bound by our instructions.

##### 4.2 Data Transfer to/from Meta; Transfers to Third Countries

The provider of the Facebook and Instagram social networks for European customers is Meta Platforms Ireland Ltd. (formerly Facebook Ireland Ltd.), headquartered within the EU. Meta Platforms Ireland Ltd. is part of the Meta Group. The parent company is Meta Platforms, Inc. (formerly Facebook Inc.), headquartered in the U.S.

According to its own statements, Meta shares infrastructure, systems, and technology with other Meta companies (including WhatsApp and Oculus). Meta also shares information globally, both internally among Meta companies and externally with partners and third parties with whom you connect via Meta services and with whom you share content. Details regarding these transfers and the categories of recipients can be found in Meta's Privacy Policy at <https://www.facebook.com/privacy/policy> under the section "How We Share Information."

The information controlled by Meta Platforms Ireland Ltd. is also transferred or transmitted to the U.S. or other third countries for this purpose, or stored and processed there. According to Meta, these data transfers are necessary to provide the services set forth in the Facebook Terms of Service, to operate globally, and to provide you with Facebook products. To safeguard data transfers, Meta relies—where available—on decisions by the European Commission in which the Commission recognizes that certain countries and territories outside the European Economic Area ensure an adequate level of data protection for personal data (so-called adequacy decisions). This applies, for example, to data transfers to Argentina, Israel, New Zealand, Switzerland, the United Kingdom, and, where the decision applies, to Canada. For data transfers to the U.S., Meta Platforms, Inc. has joined the EU-U.S. Data Privacy Framework and bases data transfers to the U.S. on the corresponding adequacy decision of the European Commission. In other cases, Meta bases the protection of data transfers from the EU/EEA to third countries on the Standard Contractual Clauses approved by the European Commission or on exceptions provided for under applicable law.

#### Further information

- on safeguarding global data transfers can be found at [https://www.facebook.com/privacy/policy/?annotations\[0\]=9.ex.2-MechanismsWeUseFor&subpage=9.subpage.3-HowDoWeSafeguard](https://www.facebook.com/privacy/policy/?annotations[0]=9.ex.2-MechanismsWeUseFor&subpage=9.subpage.3-HowDoWeSafeguard)
- on the use of standard contractual clauses can be found at <https://www.facebook.com/help/566994660333381?ref=dp> and
- For more information on existing adequacy decisions by the European Commission, click [here](#).

### III. YouTube

Heel uses the YouTube video platform provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland (“Google”); parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

Below, we would like to inform you about which personal data is processed by Google and Heel when using the YouTube channels (“YouTube channel”):

#### 1. Data processing by YouTube

When you use YouTube, Google collects information from you on its own behalf, as explained in detail in the following Google documents:

- YouTube Privacy Settings: [https://www.youtube.com/intl/ALL\\_de/howyoutubeworks/user-settings/privacy/](https://www.youtube.com/intl/ALL_de/howyoutubeworks/user-settings/privacy/)
- Google’s General Privacy Policy: <https://policies.google.com/privacy?hl=de>
- Further information on Google’s privacy and security principles: <https://safety.google/principles/?hl=de>
- Basics of data protection in YouTube apps: <https://support.google.com/youtube/answer/10364219?hl=de>

Accordingly, Google processes the following information in particular:

- Data that you provide to Google when using Google services (e.g., name, email address, phone number, etc.);
- Data that Google collects when you use the services (e.g., information about apps, browsers, devices, etc.);
- Data about your activities (e.g., videos you watch, search terms, content and ads you view and interact with, voice and audio data, etc.) and
- Location data (e.g., GPS and other transmission data, information about nearby objects, etc.).

If you are logged into YouTube when visiting our YouTube page, Google can directly associate the visit with your user account. Google may use this information to provide you with personalized content or advertising. When you interact with content on our YouTube page, the corresponding information is transmitted directly to a Google server and stored there. The information may be published in your Google user account and displayed there to your contacts. If you do not want Google to directly associate the data collected via our YouTube page with your user account, you must log out of YouTube before visiting our YouTube page and, if necessary, delete any cookies stored on your device.

Google processes this data on its own responsibility. Heel has no influence over the type and scope of the data processed by Google, the manner of processing and use, or the transfer of this data to Google and/or third parties. Heel also has no effective means of control in this regard.

## 2. Data Processing by Heel

Heel uses its YouTube channel to provide you with videos about the company, products, and services, and to interact with you. The YouTube channel is merely a supplementary service. Heel offers interested parties alternative information and communication channels (such as Heel's general corporate website).

In connection with the operation of the YouTube account, Heel processes personal data for the following purposes:

- Exchange and communication, in particular responding to user comments posted under videos, as well as interacting with third parties (sharing content from third-party pages, liking and tagging these pages); if you have a YouTube account and communicate with us through it, we also use the public information in our communication that you yourself have entered as public details and that Google makes available to us (such as your name and gender for a personalized greeting). You can significantly influence the processing of your data; to do so, simply click on this link while logged into your YouTube account: <https://myaccount.google.com>
- User Analytics on YouTube (anonymous data only): YouTube provides us with anonymized statistical data about visitors to our YouTube page (so-called "Analytics"). We use this information to better analyze our page and tailor it to your needs and interests. YouTube itself processes this data in a more

detailed manner; you can find more specific information on this in the Google Privacy Policy at the following link:

<https://policies.google.com/privacy?hl=de&q1=de>.

The processing of personal data via our YouTube channel is based on our legitimate interests in effective communication with the users of our YouTube channel, for corporate presentation and communication, as well as for marketing purposes in accordance with Article 6(1)(f) of the GDPR. We use the information transmitted to us by Google to optimize the content and features of our YouTube account and to provide you with content relevant to you, without directly obtaining knowledge of your identity as a visitor. This constitutes our overriding legitimate interests.

We do not store your personal data outside of the social media accounts, and even there only for as long as is necessary for the purposes of processing. We will delete personal data or restrict its processing as soon as the purpose of the processing has been fulfilled or ceases to apply (for example, once a request has been conclusively answered), unless legal, contractual, or statutory requirements mandate the retention of the data.

### 3. Disclosure of Your Data; Transfers to Third Countries

#### 3.1 Disclosure of Data by Heel to Third Parties

Unless otherwise explained in this section, we generally do not disclose your data to third parties. In some cases, we use external service providers to process personal data on our behalf under a data processing agreement pursuant to Article 28 of the GDPR ( ), who assist us with technical issues, customer communication within individual projects, or the maintenance of our social media accounts in accordance with our instructions. These service providers are located in the EU, are carefully selected and commissioned by us, and are bound by our instructions.

#### 3.2 Data Transfer to/from Google; Transfers to Third Countries

The provider of YouTube for European customers is Google Ireland Limited, based in the EU. Google Ireland Limited is part of the Google Group. The parent company is Google LLC, based in the USA. However, according to its own statements, Google operates servers all over the world. It cannot therefore be ruled out that your data may also be processed on servers outside the EU/EEA. This applies in particular to data transfers to the U.S. parent company Google LLC, which is based in the United States. Details regarding the framework conditions for data transfers can be found in Google's Privacy Policy at <https://policies.google.com/privacy/frameworks?hl=de>

According to its own statement, Google relies on adequacy decisions issued by the European Commission for any data transfers to third countries. Google bases data transfers to the United States on the EU-U.S. Data Privacy Framework. If necessary, Google also relies on the Standard Contractual Clauses. A copy of the Standard Contractual Clauses can be requested from Google at

<https://support.google.com/policies/troubleshooter/7575787?hl=de>

## Further information

- on the use of mechanisms to safeguard EU/EEA-to-third-country data transfers by Google can be found at <https://policies.google.com/privacy/frameworks?hl=de>
- Further information on existing adequacy decisions by the European Commission can be found [here](#).

## IV. Pinterest

Heel uses the online pinboard platform Pinterest operated by Pinterest Europe Ltd., Palmerston House, 2nd Floor, Fenian Street, Dublin 2, Ireland (“Pinterest”); parent company: Pinterest, Inc., 651 Brannan St., San Francisco, CA 94107, USA. Below, we would like to inform you about which personal data is processed by Pinterest and Heel when using the virtual pinboard for graphics and photographs (“Pinterest page”):

### 1. Data processing by Pinterest

If you use Pinterest, Pinterest collects information from you on its own behalf, as explained in detail in the following Pinterest documents:

- Pinterest Privacy Policy: <https://policy.pinterest.com/de/privacy-policy>
- Pinterest Privacy and Data Settings: <https://help.pinterest.com/de/article/your-privacy-and-data-settings>
- Access to Personal Data: <https://help.pinterest.com/de/article/review-personal-data-options>
- Cookie Information: <https://policy.pinterest.com/de/cookies>
- Personalization settings: <https://help.pinterest.com/en/article/personalization-and-data>

Pinterest therefore processes the following information in particular:

- Account data (e.g., name, email address, date of birth, gender, language);
- Content you provide (e.g., Pins, photos, comments)
- Location data (e.g., precise location, if shared within the access device).
- Communication data (e.g., contact information, messages)
- Device and log data that Pinterest collects when you use the services (e.g., device type, IP address, log data);
- Cookies and similar technologies (e.g., to save language settings and create log files);
- Usage data and inferences (e.g., which Pins you click on, what terms you search for, boards you create, and text you write in a comment or description) and other data you provided during registration, as well as data from partners and advertisers to draw inferences about you and your preferences;
- User decisions (e.g., settings you have configured, such as those related to privacy or notifications).

If you are logged into Pinterest while visiting our Pinterest page, Pinterest can directly associate the visit with your user account. Pinterest may use this information to offer you personalized content or advertising. When you interact with content on our Pinterest page, the relevant information is transmitted directly to Pinterest and stored there. The information may be published in your Pinterest user account and displayed there to your contacts. If you do not want Pinterest to directly associate the data collected via our Pinterest page with your user account, you must log out of Pinterest before visiting our Pinterest page and, if necessary, delete any cookies stored on your device.

Pinterest processes this data on its own responsibility. Heel has no influence over the nature and scope of the data processed by Pinterest, the manner of processing and use, or the disclosure of this data to Pinterest and/or third parties. Heel also has no effective means of control in this regard.

## 2. Data Processing by Heel

Heel uses its Pinterest page to provide you with content on an online pinboard and to interact with you. The Pinterest page is merely an additional service offered by . Heel offers interested parties alternative information and communication channels (such as Heel's general corporate website).

In connection with the operation of the Pinterest page, Heel processes personal data for the following purposes:

- Exchange and communication, in particular responding to user comments and/or posts published on our Pinterest page, and responding to personal messages sent to us via our Pinterest pages or other communication channels; if you have a Pinterest account and use it to communicate with us, we may also use the public information you have entered yourself as public details and that Pinterest makes available to us during communication (such as your name and gender to address you personally).
- User analysis on Pinterest (anonymous data only): Pinterest also provides us with anonymized statistical data about visitors to our Pinterest page via the "Audience Insights" or "Pinterest Analytics" service. To this end, Pinterest stores a cookie on your device when you visit our Pinterest page. If you are logged in as a Pinterest user, this cookie can be linked to your user account. If you visit Pinterest pages on multiple devices as a user, data collection and analysis may also occur across devices. Pinterest provides us with the information collected in this way in the form of aggregated, anonymized data, which we can use to analyze how users interact with our Pinterest page (such as which categories were viewed, the age distribution and gender of the target audience, and which devices were used). We do not have access to the data underlying these analyses. We use the information transmitted to us by Pinterest in this manner to optimize the content and features of our Pinterest page and to provide you with content and interest-based advertisements relevant to you without directly obtaining knowledge of your identity as a visitor.

Our processing of personal data via our Pinterest pages is based on our overriding legitimate interests in effective interaction with users of our Pinterest pages, corporate presentation and communication, user analysis, and marketing purposes in accordance with Article 6(1)(f) of the GDPR. We use the information transmitted to us by Pinterest to optimize the content and features of our Pinterest pages and to provide you with content relevant to you and interest-based advertisements without directly obtaining knowledge of your identity as a visitor. This constitutes our legitimate interests.

We do not store your personal data outside of the social media accounts, and even there, only for as long as is necessary for the purposes of processing. We will delete personal data or restrict its processing as soon as the purpose of the processing has been fulfilled or no longer applies (for example, once a request has been conclusively answered), unless legal, contractual, or statutory requirements mandate the retention of the data.

### 3. Disclosure of Your Data; Transfers to Third Countries

#### 3.1 Disclosure of data by Heel to third parties

Unless otherwise specified in this section, we generally do not disclose your data to third parties. In some cases, we use external service providers to process personal data under a data processing agreement pursuant to Article 28 of the GDPR, who assist us with technical issues, customer communication within individual projects, or the maintenance of our social media accounts in accordance with our instructions. These service providers are located in the EU, are carefully selected and commissioned by us, and are bound by our instructions.

#### 3.2 Data Transfer to/from Pinterest; Transfers to Third Countries

The provider of Pinterest for European customers is Pinterest Europe Limited, based in the EU. Pinterest Europe Limited is part of the Pinterest Group. The parent company is Pinterest Inc., based in the USA. According to its own statements, Pinterest is a global service, and when using it, data is transferred to regions outside the user's home country. It cannot therefore be ruled out that your data may also be processed on servers outside the EU/EEA. This applies in particular to data transfers to the U.S. parent company, Pinterest Inc., based in the United States.

According to its own statements, Pinterest relies on adequacy decisions by the European Commission for transfers to third countries. Pinterest bases data transfers to the U.S. on the EU-U.S. Data Privacy Framework (data protection framework between the EU and the U.S.). If necessary, Pinterest also relies on standard contractual clauses or exemptions under data protection law. You can request the adequacy decisions or standard contractual clauses directly from Pinterest at <https://policy.pinterest.com/de/privacy-policy#section-contact-us>.

For more information on the safeguards used, please visit <https://policy.pinterest.com/de/privacy-policy#section-transferring-your-information>.

## V. TikTok

Through its TikTok channels, Heel uses the technical platform and services of TikTok Information Technologies UK Limited, 4 Lindsey Street, Barbican, London, EC1A 9HP, United Kingdom, and TikTok Technology Limited, 10 Earlsfort Terrace, Dublin, D02 T380, Ireland, company number 635755 (hereinafter collectively: "TikTok").

Heel and TikTok are partly separately responsible for data processing in connection with the aforementioned TikTok services (see Section V.1 regarding data processing under TikTok's sole responsibility, and Section V.3 regarding data processing under Heel's sole responsibility), but in certain areas they are also jointly responsible within the meaning of Article 4(7) of the GDPR (see Section V.2). For the areas where joint responsibility applies, Heel has entered into an agreement with TikTok regarding joint processing under data protection law (the so-called "TikTok Analytics Joint Controller Addendum"). You can access the agreements at:

<https://www.tiktok.com/legal/page/global/tiktok-analytics-joint-controller-addendum/en>

Below, we would like to inform you about which personal data is processed by TikTok and Heel and how responsibility under data protection law is distributed between them:

### 1. Data Processing by TikTok

When you visit this platform, TikTok collects, among other things, your IP address as well as other information that is available on your device, for example in the form of cookies. The data collected about you in this context is processed by TikTok and may be transferred to countries outside the European Economic Area. TikTok is solely responsible for this data processing under data protection law.

TikTok provides further details on data processing in its Privacy Policy. There you will also find information on how to contact TikTok, how to exercise your rights with respect to TikTok, and links to, among other things, TikTok's Cookie Policy. The Privacy Policy and further information are available at the following link:  
<https://www.tiktok.com/legal/page/eea/privacy-policy/de>

In its Cookie Policy, TikTok explains how it sets and uses cookies. TikTok uses cookies for both registered and unregistered users. The Federal Office for Information Security (BSI) provides information on how you can limit cookies on your device ([link](#)).

Information on how to manage your privacy settings on TikTok or delete your account can be found on the following TikTok support pages, among others:  
<https://support.tiktok.com/de/account-and-privacy>

According to its own statements, TikTok stores data for as long as necessary to provide the platform and for the other purposes specified in the TikTok Privacy Policy. According to TikTok, it also retains the data if this is necessary to fulfill contractual and legal obligations, if TikTok has a legitimate business interest in doing so, and to assert or defend legal claims. For more information on data retention, please visit: <https://www.tiktok.com/legal/page/eea/privacy-policy/de>

## 2. Joint Responsibility Between TikTok and Heel on TikTok Pages

Heel has enabled the TikTok Analytics feature for its TikTok channels[BC1]. This means that Heel receives anonymous statistics from TikTok regarding the use and engagement with the page. The following information is provided, for example:

- Page followers and visitors: This category provides Heel with insights into the follower base and page visitors, specifically the number of people who follow or visit the Heel channel, including demographic data such as average age, gender, location, language, and information about their devices, such as browsers;
- Data on interactions with posts: This category contains information on the overall engagement with posts over a specific period (e.g., content, views, likes, comments, followers, and shares of the posts, as well as other interactions with them);
- Reach: The number of people who see a specific post. The number of interactions on a post. From this, we can determine, for example, which content resonates better with the community than others.

We use these statistics—from which we cannot draw conclusions about individual users—to continuously improve our online offering on TikTok and better cater to our users' interests. We cannot link the statistical data to our followers' profile data. You can use your TikTok settings to decide in what form targeted advertising is displayed to you.

Processing is based on our overriding legitimate interests in effective engagement with visitors to our TikTok channel, as well as in improving our corporate presentation and communication, in accordance with Article 6(1)(f) of the GDPR.

The integration of the TikTok Analytics feature establishes joint responsibility between Heel and TikTok within the meaning of Article 26 of the GDPR. The so-called "TikTok Analytics Joint Controller Addendum" applies accordingly to this channel. You can access the agreements at:

<https://www.tiktok.com/legal/page/global/tiktok-analytics-joint-controller-addendum/en>

## 3. Data Processing by Heel on TikTok

When you comment on, share, or otherwise interact with a post on the platform, Heel processes personal data. This includes your TikTok user data (specifically display name, username, profile picture), the content of the comments you submit, and the related metadata (specifically the date on which you posted the respective comment).

If you also follow one or more TikTok channels on TikTok, Heel processes this information as well.

Heel processes this data primarily for the purpose of recruiting new apprentices and dual-track students, providing information about products, placing advertisements, and directing users to our websites. The channel's content is intended to showcase, among other things, the day-to-day work and responsibilities of Heel trainees and students, as well as our products. The legal basis for Heel's processing of this data is

the balancing of interests pursuant to Article 6(1)(f) of the GDPR, and, where users have provided consent, Article 6(1)(a) of the GDPR. In addition, Heel may store the aforementioned data if and for as long as this is necessary for legal proceedings or to fulfill retention obligations.

#### 4. Disclosure of Your Data; Transfers to Third Countries

##### 4.1 Disclosure of Data by Heel to Third Parties

Unless otherwise explained in this section, we generally do not disclose your data to third parties. In some cases, we use external service providers to process personal data within the framework of data processing on our behalf pursuant to Article 28 of the GDPR, who assist us with technical issues, customer communication within individual projects, or the maintenance of our social media accounts in accordance with our instructions. These service providers are located in the EU, are carefully selected and commissioned by us, and are bound by our instructions.

##### 4.2 Data Transfer to/from TikTok; Transfers to Third Countries

The recipient of the data is TikTok Technology Limited, the operator of the social media platform. TikTok stores personal data in third countries such as the U.S., Malaysia, and Singapore. Furthermore, according to TikTok, access by its corporate group based in Canada, the UK, Israel, Japan, South Korea, Australia, Brazil, China, Malaysia, and the Philippines is possible. TikTok may transfer your personal data to third parties for its own purposes and under the responsibility of the TikTok corporate group. The recipients of such disclosures also include the general public, i.e., potentially anyone.

To ensure the security of data transfers, TikTok relies on decisions by the European Commission regarding transfers to the U.S., Canada, the UK, Israel, Japan, and South Korea, in which the Commission recognizes that certain countries and territories outside the European Economic Area ensure an adequate level of data protection for personal data (so-called adequacy decisions). In other cases, TikTok relies on the Standard Contractual Clauses approved by the European Commission to safeguard data transfers from the EU/EEA to third countries.

For more information on safeguarding third-country transfers when using TikTok, please visit <https://www.tiktok.com/legal/page/eea/privacy-policy/de>.

## VI. LinkedIn

Heel uses the technical platform and services of LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland (hereinafter: "LinkedIn") to operate the company's LinkedIn pages.

Heel and LinkedIn are partially separate with regard to data processing in connection with the aforementioned LinkedIn services (see Section VI.1 regarding data processing under LinkedIn's sole responsibility, and Section VI.3 regarding data processing under Heel's sole responsibility), but in certain areas they are also jointly

responsible within the meaning of Article 4(7) of the GDPR (see Section VI.2). For the areas where joint responsibility applies, Heel has entered into an agreement with LinkedIn regarding joint processing under data protection law (the so-called “Page Insights Joint Controller Addendum”). You can access the agreements at: <https://legal.linkedin.com/pages-joint-controller-addendum>.

In the following, we would like to inform you about which personal data is processed by LinkedIn and Heel and how responsibility under data protection law is distributed between them:

## 1. Data Processing by LinkedIn

When you visit our LinkedIn page, LinkedIn carries out its own processing operations over which Heel has no control. Please note that you use the LinkedIn platform and its features at your own risk. This applies in particular to the use of interactive features (e.g., sharing, commenting, etc.).

Information about what data is processed by LinkedIn and for what purposes can be found in

- LinkedIn’s Privacy Policy at <https://de.linkedin.com/legal/privacy-policy?> as well as
- the information on the cookies used at <https://de.linkedin.com/legal/cookie-policy?>

Accordingly, LinkedIn may process the following information in particular:

- Data you provide to LinkedIn upon registration, such as your username, password, email address, or phone number;
- Data you publish in your profile, such as education, work experience, skills, photo, location, or region;
- Data you publish or upload, e.g., when you fill out a form or survey on LinkedIn, submit a resume, or complete a job application; When you import your address book, LinkedIn receives your contacts (including contact information that your service providers or your app automatically added to your address book when you contacted addresses or numbers that were not already on your list);
- Contact and calendar data from third parties (including employers, colleges, or vocational schools) when third parties sync their contact or calendar data with services, link their contacts to member profiles, scan and upload business cards, or send messages via LinkedIn services;
- Usage data, for example, when you view or click on content or ads (on or off our websites and apps), perform a search, install or update one of our mobile apps, share articles, or apply for a job; LinkedIn uses login credentials, cookies, device information, and IP addresses to identify you and log your usage;

- Cookies and similar technologies to collect data (e.g., device IDs) to recognize you and your device(s) within, outside of, and across various services and devices; LinkedIn also allows certain third parties to use cookies;
- Device and location data, such as the URL of the website you came from, as well as the website you navigate to next, and the time of your visit; in addition, information about your network and device (e.g., your IP address, proxy server, operating system, web browser and add-ons, device identifier and capabilities, cookie IDs, and/or your internet service provider or mobile carrier); If you access LinkedIn services from a mobile device, that device sends data about your location based on your phone settings (depending on the individual settings on your device); and
- communication data, such as when you send, receive, or interact with messages in connection with LinkedIn services; for example, if you receive a connection request on LinkedIn, LinkedIn tracks whether you have responded to it and sends you reminders.

From a data protection perspective, LinkedIn generally carries out this processing on its own responsibility. We have included this information here solely to provide you with a better overall impression of the social media platform and to increase transparency regarding the processing operations as a whole.

## 2. Joint responsibility between LinkedIn and Heel on LinkedIn pages

For example, when you visit our LinkedIn page or follow it, LinkedIn also processes personal data to provide us with statistics and insights in an anonymized form. This gives us insights into the actions visitors take on our LinkedIn page (so-called Page Insights).

To this end, LinkedIn processes, in particular, data that you have already provided to LinkedIn via the information in your profile, such as data regarding your job title, country, industry, years of service, company size, and employment status. In addition, LinkedIn will process information about how you interact with our LinkedIn page, such as whether you follow our LinkedIn page. LinkedIn processes and stores personal data for Page Insights in accordance with the LinkedIn Terms of Service and LinkedIn's Privacy Policy.

We use these statistics, from which we cannot draw conclusions about individual users, to continuously improve our online offering on LinkedIn and better cater to the interests of our users. We cannot link the statistical data to the profile data of our visitors.

By integrating the Page Insights feature, Heel and LinkedIn share joint responsibility within the meaning of Article 26 of the GDPR. The so-called Page Insights Joint Controller Addendum applies accordingly to our LinkedIn page. You can access the agreements at: <https://legal.linkedin.com/pages-joint-controller-addendum>.

### 3. Data Processing by Heel on LinkedIn

### 4. Disclosure of Your Data; Transfers to Third Countries

#### 4.1 Disclosure of Data by Heel to Third Parties

We do not generally disclose your data to third parties—unless otherwise explained in this section. In some cases, we use external service providers to process personal data within the framework of data processing on our behalf pursuant to Article 28 of the GDPR, who assist us with technical issues, customer communication within individual projects, or the maintenance of our social media accounts in accordance with our instructions. These service providers are located in the EU, are carefully selected and commissioned by us, and are bound by our instructions.

#### 4.2 Data Transfer to/from LinkedIn; Transfers to Third Countries

According to LinkedIn, its services require a data flow from the EU to the US and back. When you visit our LinkedIn page, your data is therefore also transferred to LinkedIn companies outside the EU. To ensure that personal data is protected during such transfers, LinkedIn relies on the Standard Contractual Clauses approved by the European Commission for certain data transfers. In addition, LinkedIn Corporation and its U.S. subsidiaries are certified under the EU-U.S. Data Privacy Framework. LinkedIn's participation in the Data Privacy Framework applies to personal data provided by LinkedIn members, customers, and business partners, as well as to employee data, provided that such personal data originates from the EU/EEA.

For more information on safeguarding third-country transfers when using LinkedIn, please visit [https://www.linkedin.com/help/linkedin/answer/62533?trk=microsites-frontend\\_legal\\_privacy-policy&lang=en](https://www.linkedin.com/help/linkedin/answer/62533?trk=microsites-frontend_legal_privacy-policy&lang=en).

## VII. Data Subject Rights | Exercising Data Subject Rights

### 1. General Rights

You have the following rights with respect to us regarding the personal data concerning you:

- **Right of access (Art. 15 GDPR)**  
You may request information regarding whether we process your personal data. If this is the case, you have the right to access this personal data as well as to receive further information related to the processing (see Art. 15 GDPR). Please note that this right of access may be restricted or excluded in certain cases.
- **Right to rectification (Art. 16 GDPR)**  
If personal data concerning you is no longer accurate or is incomplete, you may request that this data be rectified and, where necessary, completed (see Art. 16 GDPR).

- Right to erasure or restriction (Art. 17 and 18 GDPR)  
If the legal requirements are met, you may request the erasure of your personal data (see Art. 17 GDPR) or the restriction of the processing of such data (Art. 18 GDPR), for example if the processing of this personal data is no longer necessary for the purposes for which we collected it.
- Right to data portability (Art. 20 GDPR)  
Under certain conditions, you have the right to receive the personal data concerning you that you have provided to us in a specific format or to transmit this data to another controller (see Art. 20 GDPR).

To exercise your aforementioned rights, certain legal requirements must be met, and in certain cases, your rights may be restricted due to legal exceptions, in particular those contained in Art. 17(3) and Art. 22(2) of the GDPR or in national laws.

With regard to data processing in connection with Meta services (Facebook or Instagram pages), you may also use the form provided by Meta at: [https://m.facebook.com/help/contact/1994830130782319?\\_rdi](https://m.facebook.com/help/contact/1994830130782319?_rdi)

As far as YouTube is concerned, you can adjust your privacy settings [here](#). You can also enable "Incognito mode." Incognito mode allows you to browse YouTube without the search results and videos you view during that session appearing in your YouTube account's search and watch history. You can enable Incognito mode [here](#).

## 2. RIGHT TO OBJECT (Art. 21 GDPR)

You also have the right to object at any time to our processing of your personal data, namely (i) in the case of direct marketing at any time, or (ii) otherwise for reasons arising from your particular situation, if we process your personal data to safeguard our legitimate interests based on Art. 6(1)(f) of the GDPR (Art. 21(1) and (2) of the GDPR). In the event of an objection, we will in any case cease processing your personal data for direct marketing purposes; in the case of data processing for other reasons, we will generally cease such processing unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms, or the processing serves to assert, exercise, or defend legal claims.

For information on the digital forms from Meta and Google, see the explanations above under Section IV.1.

## 3. Right to Withdraw a Declaration of Consent Under Data Protection Law

You have the right to withdraw any consent you have given under data protection law at any time without providing a reason. Withdrawing your consent does not affect the lawfulness of the processing carried out on the basis of the consent given prior to its withdrawal. To exercise this right with respect to Heel, you can contact us using the contact details provided in Section I.

For information on the digital forms from Meta and Google, see the explanations above under Section IV.1.

#### 4. Right to lodge a complaint with a supervisory authority

You may lodge a complaint with a data protection authority regarding our processing of your personal data, in particular in the EU Member State where you have your habitual residence or workplace, or where an alleged violation of applicable data protection laws has occurred (see Art. 77 GDPR).

#### 5. Specifics Regarding Facebook Pages

Due to Meta's role as the operator of the social network, it is advisable to submit requests for information and exercise other data subject rights directly with Meta, insofar as these relate to processing under joint responsibility (see Section II.2 above).

As the operator of the social network, Meta alone has access to the necessary information and is able to take the appropriate measures to implement your data subject rights and provide information. If necessary, we will of course assist you in this regard. You are also welcome to contact us for this purpose. You can find our contact details under Section I.

In particular, pursuant to the contractual agreements with us, Meta is responsible for the processing of personal data for the "Insights" service. In this context, Meta has undertaken to assume all obligations under the GDPR, particularly in connection with informing data subjects and implementing data subject rights (Articles 15 through 21 of the GDPR). For the individual data subject rights (right of access, right to object, right to data portability, etc.), Meta uses various online forms, which are available at [https://www.facebook.com/legal/terms/information\\_about\\_page\\_insights\\_data](https://www.facebook.com/legal/terms/information_about_page_insights_data)

Meta also implements appropriate technical and organizational measures in accordance with Art. 32 of the GDPR to ensure the security of processing. Further information on these measures can be found at [https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum) (Appendix "Security").

Meta and Heel have also agreed that the Irish Data Protection Commission is the lead supervisory authority overseeing the processing for Page Insights (see Section II.2 above). You therefore also have the right to file a complaint with the Irish Data Protection Commission (see <https://www.dataprotection.ie/>).

#### 6. Specifics Regarding TikTok Channels

With regard to data processing related to the use of TikTok, you may also use the form provided by TikTok: <https://www.tiktok.com/legal/report/privacy/webform/de>.

In addition, you have the option to manage your data independently within your TikTok account. For more information, please visit <https://www.tiktok.com/legal/page/eea/privacy-policy/de>.

When exercising data subject rights in connection with the use of TikTok, it is advisable to submit requests directly to TikTok, insofar as these relate to processing under joint responsibility (see above).

As the operator of the social network, TikTok alone has access to the necessary information and is able to take the appropriate measures to implement your data subject rights and provide information. If necessary, we will of course assist you in this regard. You are also welcome to contact us for this purpose. You can find our contact details under Section I.

## 7. Specifics Regarding LinkedIn Pages

With regard to data processing in connection with LinkedIn that we carry out jointly with LinkedIn, you can exercise your data subject rights via

- your account settings within your LinkedIn account (if available);
- by contacting LinkedIn directly at <https://www.linkedin.com/help/linkedin/ask/PPQ?lang=de>; or
- by contacting LinkedIn's Data Protection Officer directly at <https://www.linkedin.com/help/linkedin/ask/TSO-DPO>

Given LinkedIn's role as the operator of the social network, it is advisable to submit requests for information and exercise other data subject rights directly with LinkedIn. Under the joint controller agreement, LinkedIn has agreed to assume responsibility for the provision of Page Insights under the GDPR and to comply with all applicable obligations under the GDPR regarding the processing of Page Insights (including, but not limited to, data subject rights).

This means that LinkedIn, among other things, ensures that you are informed about the processed data and that the right of access and erasure is fulfilled. LinkedIn also implements appropriate technical and organizational measures in accordance with Article 32 of the GDPR to ensure the security of the processing. Further information on these measures can be found at <https://security.linkedin.com/>.

## VIII. Links to Third-Party Websites

Our social media offerings contain links to external third-party websites over whose content we have no influence. Therefore, we cannot assume any liability for this third-party content. The respective provider or operator of the linked pages is always responsible for their content. The linked pages were checked for possible legal violations at the time the links were created. No illegal content was identifiable at the time the links were created.

However, continuous monitoring of the content of the linked pages is not reasonable without concrete evidence of a legal violation. If we become aware of any legal violations, we will remove such links immediately. If you notice that the content of external providers violates applicable law, please notify us. This privacy policy applies only to content on our websites.

## **IX. Updates to the Privacy Policy**

We will revise this privacy policy from time to time to adapt it to the state of the art or to changes in the legal framework.

We therefore recommend that you check this page regularly for updates.

Effective: March 17, 2025