

# 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 "TechProtect GmbH". 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, Internet-based data transmissions can in principle have security gaps so that absolute protection cannot be guaranteed. For this reason, you are free to submit personal data on alternative ways, such as by phone or by post to us.

## 2. Data controller

References in this privacy policy to "Jabra", "we", "us" or "our" mean GN Audio A/S (a company registered in Denmark). We control the ways your personal data are collected and the purposes for which your personal data are used by GN Audio and are the "data controller" for the purposes of the applicable European data protection legislation (GDPR). We are part of a corporate group of companies ("our Group"), which includes entities in several countries as shown on our website [www.jabra.com](http://www.jabra.com). The entity responsible for the processing of your personal information (formally called the data controller) is:

GN Audio A/S

Lautrupbjerg 7; DK-2750 Ballerup; Denmark; Reg. no. 1506 9511

Phone: +45 45 75 88 88; Website: [www.jabra.com](http://www.jabra.com)

## 3. Data protection officer

If you have questions or concerns in relation to data protection, you are always welcome to contact our Data Protection Officer (DPO) via this form, or by phone: +45 45 75 00 00

## 4. Legal basis for processing

Art. 6 (1) lit. a) GDPR (icw § 25 (1) German Telecommunications-Telemedia Data Protection Act (TTDSG)) serves our company as the legal basis for processing operations where 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 another service or consideration, the processing is based on Art. 6 (1) lit. b) GDPR. The same applies to processing operations that are necessary for the implementation of pre-contractual measures, for example in the case of enquiries about our products or services.

If our company is subject to a legal obligation by which the processing of personal data becomes necessary, such as for the fulfilment of tax obligations, the processing is based on Art. 6 (1) lit. c) GDPR.

In rare cases, the processing of personal data might become necessary to protect vital interests of the data subject or another natural person. This would be the case, for example, if a visitor were to be injured on our premises and as a result their name, age, health insurance data or other vital information had to be passed on to a doctor, hospital or other third party. In this case, the processing would be based on Art. 6 (1) lit. d) GDPR.

Finally, processing operations could be based on Art. 6 (1) lit. f) GDPR. Processing operations which are not covered by any of the aforementioned legal bases are based on this legal basis if the processing is necessary for the protection of a legitimate interest of our company or a third party, provided that the interests, fundamental rights and freedoms of the data subject do not outweigh. We are permitted to carry out such processing operations in particular because they have been specifically mentioned by the 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. Disclosure of data to third parties

Your personal data will not be conveyed to third parties for purposes other than those listed below.

We will only share/convey your personal data with third parties if:

1. you have given us your express consent to do so in accordance with Art. 6 (1) lit. a) GDPR,
2. the disclosure is permissible in accordance with Art. 6 (1) lit. f) GDPR to protect our legitimate interests and there is no reason to assume that you have an overriding interest worthy of protection in the non-disclosure of your data,
3. in the event that a legal obligation exists for the disclosure pursuant to Art. 6 (1) lit. c) GDPR, as well as

In the context of the processing operations described in this privacy statement, personal data may be transferred to the USA. Companies in the USA only have an adequate level of data protection if they have certified themselves under the EU-US Data Privacy Framework and thus the adequacy decision of the EU Commission pursuant to Art. 45 GDPR applies. We have explicitly mentioned this in the privacy policy for the service providers concerned. In order to protect your data in all other cases, we have concluded commissioned processing agreements based on the standard contractual clauses of the European Commission. If the standard contractual clauses are not sufficient to establish an adequate level of security, your consent can serve as the legal basis for the transfer to third countries in accordance with Article 49 (1) a) of the GDPR. This sometimes does not apply in the case of a data transfer to third countries for which the European Commission has issued an adequacy decision pursuant to Art. 45 of the GDPR.

## 6. Technology

### 6.1 SSL/TLS-encryption

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

We use this technology to protect your transmitted data.

### 6.2 Hosting by IONOS

We host our website at IONOS SE, Elgendorfer Str. 57, 56410 Montabaur (IONOS).

When visiting our website your personal data (e.g. IP addresses in log files) are processed on the servers of IONOS.

The use of IONOS is based on Art. 6 (1) lit. f) GDPR. Our legitimate interest is the high-performance provision of our website.

We have concluded a corresponding agreement with IONOS on the basis of GDPR for commissioned processing. This is a contract required by data protection law, which ensures that IONOS only processes the personal data of our website visitors according to our instructions and in compliance with the GDPR.

Additional information and IONOS` s privacy policy can be found at <https://www.ionos.de/terms-gtc/terms-privacy>

## 7. Contents of our website

### 7.1 Contact support

Personal data is collected when contacting us (e.g. via e-mail). This data is stored and used exclusively for the purpose of answering your request or for contacting you. The legal basis

for processing the data is our legitimate interest in responding to your request in accordance with Art. 6 (1) lit. f) GDPR. Your data will be deleted after final processing of your request; this is the case if it can be inferred from the circumstances that the matter concerned has been conclusively clarified and the deletion does not conflict with any legal obligations to retain data.

## **8. Data protection in connection with the trial program**

As part of the trial program, in accordance with the respective conditions, personal data such as addresses and contact details are collected and processed by a contractor. We have concluded an agreement for this in accordance with Art. 28 GDPR. The legal basis for the collection and further processing of your personal data is Art. 6 para. 1 lit. b of the GDPR for the fulfilment of the contract with you in accordance with the terms of the program. The data collected or processed will only be used to fulfil the program and will not be passed on to unauthorised third parties. For the shipment of the trial product we pass on address information to logistics service providers. We will not pass on your data to recipients in third countries. Without the information provided by you, participation in the program is not possible.

## **9. Plugins and other services**

### **9.1 Google reCAPTCHA**

On this website we use the reCAPTCHA function. The operating company of Google reCAPTCHA is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. Google Ireland Limited is part of the Google group of companies with headquarters at 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. The reCAPTCHA function is primarily used to distinguish whether an input is made by a natural person or is abused by machine and automated processing. The service also includes the sending of the IP address and possibly other data required by Google for the reCAPTCHA service to Google.

These processing operations are carried out exclusively when explicit consent is given in accordance with Art. 6 (1) lit. a) GDPR.

The parent company Google LLC is certified as a US company under the EU-US Data Privacy Framework. There is hereby an adequacy decision pursuant to Art. 45 GDPR, so that a transfer of personal data may also take place without further guarantees or additional measures.

Further information on Google reCAPTCHA as well as Google's privacy policy can be viewed at: <https://www.google.com/intl/de/policies/privacy/>.

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

### **10.1 Right to confirmation**

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

## **10.2 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, in accordance with the statutory provisions.

## **10.3 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.

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

You have the right to demand that we erase the personal data relating to you be deleted without delay, provided that one of the reasons provided by law applies and if processing or further storage is not required.

## **10.5 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.

## **10.6 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 Art. 6 (1) lit. a) GDPR or Art. 9 (2) lit. a) GDPR or on a contract pursuant to Art. 6 (1) lit. 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 Art. 20 (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.

## **10.7 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 Art. 6 (1) lit. e) (data processing in the public interest) or lit. 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 (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.

### **10.8 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.

### **10.9 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.

## **11. Routine storage, erasure and blocking of personal data**

We process and store your personal data only for the period of time necessary to meet the storage purpose or as required by the legal provisions to which our company is subject.

If the storage purpose no longer applies or if a required retention period expires, personal data will be routinely blocked or erased in accordance with the statutory provisions.

## **12. Duration of storage of personal data**

The criterion for the duration of the retention of personal data is the respective legal retention period. Once this period expires, the data in question will be routinely erased, provided it is no longer required for the fulfilment or initiation of the contract.

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

This Privacy Policy is currently valid as of: June 2024

Due to the further development of our Internet pages and offers or due to changed legal or official requirements, it may become necessary to change this Privacy Policy. You can access and print out the current data protection declaration at any time on the website under [www.jabra-poc.com/privacy\\_policy.pdf](http://www.jabra-poc.com/privacy_policy.pdf).

### **13. Further information on data protection**

You can find the other data protection information about our company at:

<https://www.jabra.com/footerpages/disclaimer>

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

[audatis MANAGER](#).