

# PRIVACY POLICY

## GIGASET devices

Gigaset Communications GmbH and our affiliated companies (“Gigaset”, “we”, “us”, “our”) understand how important the privacy of our customers is, and so are making every effort to explain clearly how we collect, use, disclose, pass on and save your personal details.

This privacy policy applies for all Gigaset devices that pertain or make reference to this policy (collectively our “services”). This privacy policy applies regardless of whether you access our services from a computer, (mobile) phone, tablet or another device.

We at Gigaset take the protection of our customers’ data very seriously. It is precisely for this reason that we are ensuring all our products feature "Privacy by Design" as standard. All information we collect is used to make our products as good as possible. In the process, we ensure your details are protected and only used for the purposes of making available to you a product or service. We know which path your data takes through the company and ensure this happens in line with data protection specifications in a secure and protected manner.

## Who is your contact?

Your point of contact responsible for the processing of your personal details as laid down in the EU General Data Privacy Regulation (GDPR) is

Gigaset Communications GmbH  
Frankenstr. 2  
46395 Bocholt, Germany

Phone: +49 (0)2871 / 912 912

Email: [datenschutz@gigaset.com](mailto:datenschutz@gigaset.com) or [data-protection@gigaset.com](mailto:data-protection@gigaset.com)

For all issues relating to data privacy in conjunction with our products, you can also contact our Data Privacy Officer at any time. This person can be contacted at the postal address and email address given above (reference: “FAO Data Protection Officer”).

## What information do we collect?

### Your information in the user account

Creating your own user account at Gigaset might be required to use the entirety of device functions in the best possible manner. In such a case, we collect personal details from you, such as details about your person like name, first name and email address.

### Data when you use our customer service

When you contact our customer service for queries, complaints or other matters, we collect details from you. This can be personal details such as name, first name, private address, phone number, email address and device identification details.

### Data when you use our devices

**Device information** Whilst our devices are being used, we also collect, for the purposes of rendering services and guaranteeing quality, different device information depending on the device type, such as your hardware model, device hardware information, IMEI number and other unique device IDs such as

serial number, model, access registration, current software version, mobile country code, mobile network code, MAC address, operating system versions or settings of the device, with which you access the services. We also identify here personal details such as your IP address. VoIP products can as required send an internal, technical address code to the Gigaset server so they can use the free services in gigaset.net.

**Location information** Devices with mobile functions can offer special services that also process your location information when used, such as the GPS signal of your device or information on nearby WLAN access points and mobile masts, and that send this information to us when these special services are used.

## What is the purpose of processing your data?

We process your personal data in line with the provisions laid down in the EU General Data Protection Regulation (GDPR), national data protection law and all other authoritative laws.

Data processing first and foremost serves the purposes of conducting a mutual business relationship. In addition, your separate consents can be used as required as a legal data protection permission requirement. We also process your data to meet our legal obligations, in particular with regard to fiscal law. To protect the legitimate interests of ourselves and third parties (such as authorities), we also process your details as necessary on the basis of Art. 6, Para 1 f) of the GDPR. We process your data for the following purposes:

**Registration** Your personal data is processed as part of the registration process for your Gigaset product. Identification and authentication of your person as a user of our Gigaset products also take place. The legal basis here is fulfilment of a contract (Article 6, Para 1.1, Sub-para b of the GDPR).

**Product orders** Your personal data is processed during the product provision process (such as when you place orders in the eShop). This is to send order confirmations for example. The legal basis here is fulfilment of a contract (Article 6, Para 1.1, Sub-para b of the GDPR).

**Maintenance & support** Your personal data is processed as part of maintenance services and support for your device (e.g the provision of software updates). The legal basis here is fulfilment of a contract (Article 6, Para 1.1, Sub-para b of the GDPR).

**Customer promotions** Your personal data is processed as part of competitions, draws and advertising campaigns (to inform you of the prize you have won for example). The legal basis here is your consent (Article 6, Para 1.1, Sub-para a of the GDPR).

**Product optimisations** We process your usage data for our Gigaset products for the optimisation of our products (such as software updates). The legal basis here is a legitimate interest (Article 6, Para 1.1, Sub-para f of the GDPR).

**Information services** Our products render information services that (in your interests) are extended in the future. These apps might also process personal data depending on the services used. The legal basis here is fulfilment of a contract (Article 6, Para 1.1, Sub-para b of the GDPR).

**Customer surveys** Whilst collecting your opinions about our products, we process information for statistics purposes. This is used to improve our products. The legal basis here is your consent (Article 6, Para 1.1, Sub-para a of the GDPR).

**Sending of promotional material** We process personal data from you when sending promotional material or special offers pertaining to our products. The legal basis here is your consent (Article 6, Para 1.1, Sub-para a of the GDPR).

## Dissemination of your data?

Within our company group, your data is sent to certain companies when they centrally assume data processing tasks for the companies affiliated in the group (e.g. Logistics and Production).

We might also disclose your data to the following companies, but only to the extent required to render the services:

- Business partners. We communicate your data to retailers and distribution partners to make available services you require. If you provide separate consent, the business partners can use your data to make predictions about your interests, and send you promotional literature, ads and other material.
- Service providers. We can pass on your details to carefully selected companies that make available services on our behalf, such as companies helping us with repairs, acting as customer contact centres, working in customer support activities, for advertising, for conducting customer satisfaction surveys and invoicing, and for sending emails on our behalf. Contractual regulations dictate that these companies can only use your details for the services requested by us.

Furthermore, we can communicate your personal details to other recipients outside the company provided this is necessary to satisfy legal obligations. These can be authorities for example (financial authorities, courts of law).

## Safekeeping of your data?

We take the protection of your data seriously and have taken appropriate physical and technical measures to protect data we collect in conjunction with the services. Even though speedy technological advances mean there can never be end-to-end security of websites, Internet communication, computer systems and wireless links, we immediately adapt our systems in the light of such developments and always take appropriate steps to protect your data.

## Which data privacy rights can you assert as a person affected?

Contact the above address to request information on the data stored about yourself. Also, you can under certain circumstances request your data to be corrected or erased. Furthermore, you can be entitled to the right for processing of your data to be restricted and the right for data provided by you to be disclosed in a structured, established and machine-readable format.

### Right of objection

You have the right to object to the processing of your personal data for the purposes of direct advertising without specifying reasons. If we process your data for the protection of legitimate interests, you can object to this processing for reasons arising from your particular situation. We will then no longer process your personal data unless we can demonstrate compelling reasons for processing that are worthy of protection and outweigh your interests, rights and freedoms, or processing serves the purposes of enforcing, exercising or defending legal claims.

## Where can you object?

You are able to contact the aforementioned Data Protection Officer or a Data Protection Supervisory Authority about an objection.

## How long is your data stored?

We erase your personal data as soon as it is no longer required for the aforementioned purposes. Once the business relationship comes to an end, your personal details are stored as long as we are required to do so by law. This is a regular process on account of the statutory obligations for producing supporting documents and compulsory safe custody, regulated by the commercial code and the general tax code for example. Maximum storage periods are then up to 10 years. It might also be the case that personal data is stored for the period during which claims can be asserted against us (statutory limitation period of three or up to 30 years).

## Is your personal data sent to a third country?

In the event we send personal data to service providers or group companies outside the European Economic Area (EEA), it is only sent once an appropriate level of data protection has been ratified for the third country by the EU Commission, or other appropriate data privacy guarantees are in place (such as binding, in-house data protection regulations and standard EU contract clauses). Request more detailed information from the aforementioned point of contact.