PMG Presse-Monitor GmbH Privacy Policy for Customers, Test Customers and Interested Parties
Version: 27.08.2018

1. Introduction

We at PMG Presse-Monitor GmbH, Berlin, (“PMG”) take the protection of your personal data very seriously and we process your personal data exclusively within the framework of the applicable personal data protection legislation, in particular the General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (BDSG).

This Privacy Policy explains if we process personal data and, if we do, which personal data we process to which extent and for which purposes in connection with the use of our products via the Presse-Monitor System and/or the PMG MediaMeter portal. In addition, we inform you of your rights under the data protection legislation.

As we continue to develop our products and integrate new technologies in order to improve our service to you, our Privacy Policy may have to be amended.

We therefore recommend that you re-read our Privacy Policy from time to time at: https://www.pressemonitor.de/datenschutzhinweise-pmg-kunden

2. Explanation of Terms

The data protection terms used below are defined in Article 4 GDPR. The full text of the GDPR is available on the Internet at the following link:


3. Who is responsible for data processing and who can I contact?

The Controller in accordance with Article 4 (7) GDPR is:

PMG Presse-Monitor GmbH
Markgrafenstr. 62
10969 Berlin, Germany
Phone: +49 30 28493-0
Fax: +49 30 28493-200
E-mail: info@presse-monitor.de

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

PMG Presse-Monitor GmbH
Data Protection Officer
Markgrafenstr. 62
10969 Berlin, Germany
E-mail: datenschutz@presse-monitor.de

4. Who does this privacy policy apply to?

If we process personal data, in summary it means that we, for example, collect, save, use, transmit or delete it. This Privacy Policy concerns the personal data of:

- Customers of PMG, in particular:
  - Press review customers, i.e. customers of the following PMG products: PMG Digital, PMG Rights, contracts pursuant to Section 49 of the German Copyright Act (UrhG) and PMGbox;
  - Customers of PMG Media Analysis, i.e. PMG MediaMeter customers;
  - Customers of the PMG Digital Processing License (“DPL”), i.e., PMG DPL customers;
- Test customers, i.e. customers who test the PMG Digital, PMG Rights, PMGbox, PMG MediaMeter and/or PMG DPL products (“PMG Products”);
- Interested parties, i.e. persons interested in a PMG product or several PMG products; and
Service providers, agencies and other vicarious agents who use one or more PMG products on behalf of one of the above-mentioned customers or interested parties of PMG.

5. Which sources and data do we process?

We process your personal data when you contact us, e.g. as someone interested in PMG products, when you as our customer test or use our products, or simply when you write us a message.

- **Contact, e.g. if you are interested in PMG products**
  If you contact us because you are interested in PMG products, we process the data provided by you (e.g. your e-mail address, your name and your company or organisation, if applicable) and your enquiry/message. We use this data to answer and process your enquiry/message.

- **Test contract for the use of PMG products via the Presse-Monitor System and/or the PMG MediaMeter portal**
  If you conclude a contract with us for testing PMG products, we process the data provided by you in order to execute the test contract (e.g. company names, addresses and contact persons). During the test, we also process the data that would be processed if you had concluded a contract with us for the respective PMG product.

- **Contract for the use of PMG products via the Presse-Monitor System and/or the PMG MediaMeter portal**
  In order to establish, implement and terminate contracts and agreements concerning PMG products, we store the data you provide to us in this context. This includes, in particular, identification data for contact persons responsible for contract and billing processes, which is collected as it is typically used in e-mail signatures or on business cards. This includes, for example, company names, addresses, names of persons, e-mail addresses and telephone numbers. In addition, data is processed that is generated in the course of using PMG products, e.g. if your employees access (or can access) the Press-Monitor System and/or the PMG MediaMeter portal or use individual functions of the Presse-Monitor System or PMG MediaMeter portal.

Access to the Presse-Monitor System and/or PMG MediaMeter portal is via our website https://www.pressemonitor.de/en or the login page https://www.presse-monitor.de/pmgk2/login.html. Detailed information about data processing on our website can be found under “PMG Presse-Monitor GmbH Privacy Policy for visitors to our website (www.presse-monitor.de)” at https://www.pressemonitor.de/en/data-protection/. Alternatively, the PMG MediaMeter portal can be accessed via the Login page https://pmg.talk-walker.com/app/login.

Within the restricted customer area of the Presse-Monitor System and/or PMG MediaMeter portal, your data will be processed each time you enter your user name and password for the following purposes:

- Ensuring the accessibility and functionality of the Presse-Monitor System and the PMG MediaMeter portal;
- Identification of peak loads and allocation of hardware and software resources; and
- Sending press reviews, media analysis reports or other system notifications by e-mail.

In particular, the following data will be processed:

- Internet protocol address (IP address), user name, password (encrypted) and e-mail address;
- Access date/time and duration;
- Number and structure of stored searches, search groups and media analysis topics;
- Time and duration of searches performed and search groups;
- Structure and scope of search results;
- Access times and use of system functions within the search results (e.g. article preview) or use of the clipper (clipping tool for articles in the original layout), execution time, duration and volume of orders and downloads;
- Number, scope and dispatch time of e-mails sent by the system;
- Operating system and its interface;
- Information about the resolution, dimension and screen type; and
- Language and version of the browser software.
In addition, **cookies** are stored on your computer when you use the restricted customer area. Cookies are small text files that are stored on your hard drive and assigned to your browser, and via which certain information is passed to the entity that sets the cookie (in this case, us). Cookies cannot execute programs or transmit viruses to your computer. They serve to make the product range as a whole more user-friendly and effective. Details with regard to the use of cookies are explained fully in Section 9 (Use of Cookies).

6. For what purpose is your data processed - and what is the legal basis?

We process your personal data in accordance with the provisions of the GDPR and the German Federal Data Protection Act (BDSG). In detail:

6.1 Based on your consent (Article 6(1)(a) GDPR)

- **Contact, e.g. if you are interested in PMG products**
  If you contact us, e.g. in connection with a PMG product, your consent constitutes the legal basis for the processing of your data and your message to us. In addition to the data that you actively transmit to us, we also process personal data that is transmitted to us in the course of message transmission and associated with the message (e.g. IP address, date and time). We use your data to process and answer your (contact) enquiry.

- **Newsletter**
  Your consent constitutes the legal basis for sending our newsletter. In addition to the data that you actively transmit to us, we also process personal data that is collected in the course of sending the newsletter. We use your data to send the newsletter and to optimise the contents and structure of the newsletter. We use the newsletter software Newsletter2Go. In the process, your data is transmitted to Newsletter2Go GmbH.

- **Use of our website or login pages to access the Presse-Monitor System and/or PMG MediaMeter portal**
  Your consent constitutes the legal basis for data processing within the framework of the use of our website or login page in order to attain access to the Presse-Monitor System and/or PMG MediaMeter portal. Detailed information about this can be found in the “PMG Presse-Monitor GmbH Privacy Policy for visitors to the website www.presse-monitor.de”.

<table>
<thead>
<tr>
<th>Revocation of consent(s)</th>
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<tbody>
<tr>
<td>You can revoke your consent(s) in connection with your contact with us, the newsletter and use of the Press-Monitor System and/or PMG MediaMeter portal at any time.</td>
</tr>
<tr>
<td>The revocation is not subject to any conditions as to form. For example, you can submit your revocation by sending an e-mail to <a href="mailto:datenschutz@presse-monitor.de">datenschutz@presse-monitor.de</a> or a message to the contact details provided in Section 3. You can also cancel your newsletter subscription by clicking on the link provided in each newsletter e-mail.</td>
</tr>
<tr>
<td>Note: Please note that a revocation is only effective for the future. The legality of the processing carried out on the basis of the consent until the revocation remains unaffected.</td>
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6.2 Fulfilling contractual or pre-contractual obligations (Article 6(1)(b) GDPR)

We process your data to fulfil contractual or pre-contractual obligations:

The legal basis for processing your data is Article 6(1)(b) of the GDPR (Implementation of Contractual and Pre-contractual Measures). The purpose of processing is as follows:

- **Contracts for PMG products**
  The implementation of the contractual relationship(s) or corresponding pre-contractual measures between you and us.
• Settlement of legal disputes, assertion, exercise and defence of legal claims (e.g. in connection with rights and obligations under the GDPR).

6.3 Based on legitimate interest (Article 6(1)(f) GDPR)

We also process your data to protect our legitimate interests and those of third parties:

• Direct marketing
  In addition, we use the following data in particular for the purpose of direct marketing:
  - Company
  - Name of contact person
  - Address
  - E-mail address
  In this context, we also analyse the results of (direct) marketing activities in order to measure the efficiency and relevance of our activities.

Right to object to processing

Pursuant to Article 21(1) GDPR, you have the right to object at any time to the processing of your personal data carried out on the basis of Article 6(1)(f) GDPR (data processing to safeguard legitimate interests).

For more information on exercising this right and the consequences of exercising it in relation to data processing, see section 12 below.

6.4 Basis of legal provisions (Article 6(1)(c) of the GDPR)

We process your personal data in order to comply with legal obligations:

• Compliance with legal requirements
  Legal requirements are, for example, tax and commercial law retention obligations.

7. Who receives your data?

Within PMG, access to your data will only be granted to those offices which require it to perform their duties within PMG, to safeguard our legitimate interests or to fulfil contractual and statutory obligations.

We disclose your personal data to the following entities for the following reasons or purposes:

• Public authorities
  If required, we may disclose personal data to courts, authorities and other government institutions pursuant to statutory regulations.

• Auditors, tax advisors and other professionals
  We disclose personal data to auditors, tax advisors, lawyers or other freelancer professionals commissioned by us, insofar as it is required and legally permissible in order to comply with applicable laws or to assert, exercise and/or defend legal claims.

• External service providers (so-called order processors)
  In the field of data processing, we cooperate with external service providers in the following areas:
  - Server operation and hosting;
  - Software development as well as operation and maintenance of the Presse-Monitor System and PMG MediaMeter portals;
  - Newsletter and e-mail dispatch; and
  - Postal and courier services.

  These service providers have been carefully selected and commissioned by us, are bound by our instructions and are monitored on a regular basis. They are also contractually obliged to comply with the applicable data protection requirements and to maintain confidentiality.
8. **Is data transferred to a third country or to an international organisation?**

   Within the restricted customer area, data will be transferred to countries outside the EU or EEA (so-called third countries) only if this is required in order to fulfil your orders or it is prescribed by law (e.g., tax reporting obligations). Information on data transmission within the scope of using our website or login pages for registration in the customer area can be found in the “Privacy Policy for visitors of the website www.presse-monitor.de” at https://www.pressemonitor.de/en/data-protection/.

9. **Use of cookies**

   The Presse-Monitor System uses various types of cookies, the scope and functionality of which are explained below:

   - **Temporary cookies**
     Temporary cookies are automatically deleted when you close the browser. This includes, in particular, session cookies. They store a so-called session ID, which can be used to assign various requests from your browser to the shared session. This allows the system to recognise your computer when you return to the Presse-Monitor System or the PMG MediaMeter portal. Session cookies are deleted when you close your browser.

   - **Persistent cookies**
     Persistent cookies are automatically deleted after a specified period, which may vary depending on the cookie. You can delete the cookies in the security settings of your browser at any time. You can configure your browser settings according to your preferences, and for example, refuse to accept cookies. Furthermore, cookies that have already been set can be deleted at any time via an internet browser or other software programs. This is possible in all common Internet browsers. If the data subject deactivates the setting of cookies in the Internet browser used, not all functions of the Presse-Monitor System or the PMG MediaMeter portal may be fully usable under certain circumstances.

10. **Data security**

    Within our technical infrastructure, the data processed by us are protected from external interference with state-of-the-art technology with firewalls, etc. The transfer of data between you and us takes place as soon as you access the Presse-Monitor System or the PMG MediaMeter portal on our website. SSL/TSL encryption is used in all cases.

11. **How long will my data be stored?**

    We process and store your personal data for as long as is necessary to achieve the purpose for which it was collected. If the data are no longer required to achieve the purpose for which they were collected, they will be deleted, unless temporary additional processing is necessary for the following purposes:

    - **Statutory retention periods**
      To comply with the (commercial and tax) statutory periods for retention and documentation stipulated in the German Commercial Code (HGB) or German Tax Code (AO). These periods are up to ten years.

    - **Evidence**
      To preserve evidence within the scope of the statutory limitation periods if there are concrete indications that the evidence is required. According to Section 195 et seq. of the German Civil Code (BGB), these limitation periods can be up to thirty years, however, the usual limitation period is three years.

    - **Direct marketing**
      Your data, which we use for the purpose of direct marketing, will only be deleted in the following cases:
      - We do not use your information for direct marketing purposes for more than 2 years; or
      - You file an objection. For more information on exercising the right of appeal, see Section 12.

    In addition, subject to the purposes/periods described above, the following applies to storage with regard to individual processes:
12. What are my data protection rights?

As a data subject of data processing, you have the following rights under the GDPR ("Data Subject Rights"):

- **Right to information**
  According to Article 15 GDPR, you can request information from us as to whether we process your personal data and what data that is.

- **Right to rectify data**
  If your information is incorrect, you can request correction in accordance with Article 16 of the GDPR. If your data is incomplete, you can request that it be completed. If we have passed on your data to third parties, these third parties will be informed of your correction, insofar as this is required by law.

- **Right to deletion of personal data**
  You have the right to have your data deleted, insofar as the requirements of Article 17 GDPR are met (in particular, if the purposes of data collection or processing cease to apply).

- **Right to limitation of processing**
  You have the right to restrict the processing of your data, insofar as the requirements of Article 18 GDPR are met.

- **Right to data portability**
  Furthermore, if requested, we will make your data available to you for further use or transmit it to a recipient designated by you.

- **Right to revoke consent** (for more details on exercising this right, see Section 6.1)
  If you consented to the processing of your personal data, you have the right to revoke this consent at any time with effect for the future, i.e. the revocation does not affect the legality of the processing carried out on the basis of the consent before the revocation. After revocation, we may only further process the personal data to the extent that the processing is still necessary due to legal requirements.

- **Right to object to processing**
If you file an objection, we will no longer process your personal data for the purposes covered by the objection, unless:

- We can demonstrate compelling legitimate grounds for the processing which outweigh the interests, rights and freedoms of the data subject; or
- The processing is for the purpose of asserting, exercising or defending legal claims.

Insofar as the objection only relates to data processing in connection with direct marketing, then we will no longer process your personal data for this purpose.

The objection is not subject to any conditions as to form. For example, you can submit an objection by sending an e-mail to datenschutz@presse-monitor.de or a message to the contact details provided above in Section 3.

**Right to lodge a Complaint**

Furthermore, you have the right to submit a complaint to a data protection regulatory authority (Article 77 GDPR in connection with Section 19 German Federal Data Protection Act (BDSG)).

### 13. Effect of Non-Notification

In connection with contractual obligations, you must provide us with the personal data that is required for contract acceptance and execution as well as fulfilment of the associated obligations. Without this data we will not be able to conclude or execute the contracts. As a result, the individual purposes described above cannot be achieved.

### 14. No automated decision-making

We do not use fully automated decision-making pursuant to Article 22 GDPR for establishing and implementing contractual relationships.