## Data Protection Policy of Paragon Software Group

# 1. Who we are

This Paragon Data Protection Policy ("Data Protection Policy") describes how Paragon Technologie GmbH collects and processes your information. The data controller for the information you provide or that we collect on paragon-software.com and its subdomains is:

Leo-Wohleb-Straße 8 D-79098 Freiburg i.Br., Germany

Paragon Technologie GmbH Systemprogrammierung

Tel. + 49 (0)761 59018-201

Fax + 49 (0)761 59018-130

E-Mail: info@paragon-software.com www.paragon-software.com

The company data protection official may be contacted in writing at Paragon Technologie GmbH Systemprogrammierung, attn: The Data Protection Official, Leo-Wohleb-Straße 8, D-79098 Freiburg i.Br., Germany or in emailing at

dsba2018@paragon-software.com

2. Information we collect and how we use them

#### When you visit our website www.paragon-software.com we automatically collect the information transmitted from your browser to our website and we temporarily store that information in a so-called logfile. In the course of this procedure, the following data is collected and stored, without any action on your part, until the time of automatic deletion: the IP address of

a) When visiting our website

the accessing computer, the date and time of access, the name and URL of the retrieved file, the website from which access is made (Referrer-URL), the browser used by you and, if necessary, the operating system of your computer as well as the name of your Internet Access Provider The purposes of processing any of the data mentioned above are as follows: · establishing a successful connection to our website, • guaranteeing a convenient usability of our website,

• for reasons of system security and statistical evaluation • and for other administrative purposes.

- The legal bases of the processing of data is Article 6 (1)(1)(f) of the GDPR, legitimate interests resulting from the listed purposes of processing above. Under no circumstances, we will use the collected data to identify an individual. We use
- cookies and analytical services to automatically collect information about you when you visit our website. Further information on this can be found in sec. 4 and 5 of this privacy policy.

b) When subscribing to our newsletter After your expressly consent persuant to Article 6 (1)(1)(a) GDPR we will use your email address to provide you with our regular newsletter. An email address is sufficient to receive our newsletter. You may unsubscribe from the newsletter at any time by using the link at the end of each newsletter, or by telephone, by mail, or by email to dsba2018@paragonsoftware.com.

#### c) When using our contact form If you have any questions or concerns please contact us via our contact form on our website. Since we need to know from

3. Disclosure of Data

whom a request is coming and where to send an answer to, a valid email address is required. Further information is

voluntary. When you contact us, we process your information, but only after your consent persuant to Article 6 (1)(1)(a) GDPR.

### reason to believe of overriding your legitimate interest in preventing the disclosure of your personal data, • persuant to Article 6 (1)(1)(c) GDPR, there is a legal obligation for us to do so, and

• persuant to Article 6 (1)(1)(f) GDPR, it is necessary for the establishment, exercise or defense of legal claims and there is no

• it is permitted by law and, persuant to Article 6 (1)(1)(b) GDPR, it is necessary for the settlement of the terms and conditions

Paragon Software may share personal data to third parties when:

of the contract with you.

• you have given your expressly consent persuant to Article 6 (1)(1)(a) GDPR,

- 4. Cookies
- We use cookies on our website. Cookies are small text files that are automatically sent to or accessed from your web browser and stored on your device (laptop, tablet, smartphone etc.) when visiting our website. Cookies do not cause any damage on

your computer and do not contain any malware (viruses, Trojans and other programs causing harm). A cookie contains

information resulting from the connection with a specific device but no information, which betray your identity. The

application of Cookies helps us improve your experience of our services. We use so-called session cookies to recognize the

## pages of our website you have visited before. They are deleted automatically when you leave our website.

To optimize the usability of our website we use temporary cookies, which are stored on your device for a defined period of

time. When you return to our website, these cookies enable us to automatically recognize that you have visited us before and identify your preferred entries and settings. Furthermore, we use cookies to compile statistics about the use of the website that help us to improve our services (see sec. 5). These cookies are automatically deleted after a defined period oft time. Data processed by cookies is required for purposes mentioned above for the protection of our and third parties legitimate interests persuant to Article 6 (1)(1)(f) GDPR. Most Internet browsers automatically accept cookies. However, you can configure your browser so that no cookies are stored on your computer or a message appears whenever you receive a new cookie. However, deactivating cookies may prevent you from having access to all features available through our website.

5. Analytical tools In order to constantly improve and optimize our services, we use so-called tracking technologies – persuant to Article 6 (1)(1) (f) GDPR. Moreover, we utilize them to analyze how users use the site. In accordance with the before-mentioned article these interests are considered ,legitimate'. The relevant purposes of data processing and data categories can be found in the corresponding tracking technologies.

This website uses Google Analytics, a web analysis service of Google Inc. (https://www.google.de/intl/de/about/) (1600

Amphitheatre Parkway, Mountain View, CA 94043, USA; hereinafter "Google"). USA Google Analytics uses pseudo anonymized

usage profiles and cookies (see sec. 4). Information about the usage of our website collected by cookies i.e.

#### hostname of the accessing computer • (IP address),

• browser type/version,

• the operating system of your computer,

• Referrer-URL (the website from which access is made),

**Google Analytics** 

• time and date of access, are generally transmitted to and stored on a Google server based in the USA. Google will only use this information on behalf of the operator of this website to analyze your use of this website, to compile reports on website activity, and provide other

services for the website operator associated with website and internet use. Google may also pass this information on to third

parties, if this is required by law, or if third parties are processing this data on instructions from Google. Google will not use

your IP address in connection with other Google data. IP addresses are anonymized in such a way that it can no longer be

assigned to an individual (IP masking). You can prevent cookies from being saved by setting your browser software

Alternatively, to the browser-add-on, especially when using browsers on mobile devices, you can prevent the use of Google

Analytics by clicking this link. An opt-out cookie is activated that prevents the collection of your data when visiting our website

in the future. The opt-out cookie is only valid on this browser and for our website alone. It is stored on your device. If you

accordingly; however, we would like to inform you that by doing so, you might not have access to all functions of this website. Furthermore, you can prevent the data generated by these cookies (including your IP address) and related to your use of the website from being recorded and transmitted to Google and prevent Google from processing this data by downloading and installing the browser plug-in available from the following link: (https://tools.google.com/dlpage/gaoptout?hl=de).

delete the cookies on this browser, you need to reactivate the opt-out cookie. For more information, please visit (https://support.google.com/analytics/answer/6004245?hl). 6. Plug-ins and tools Persuant to Article 6 (1)(1)(f) GDPR this website uses social plug-ins by the social networks Facebook, Twitter, and Instagram for making our company better known. In accordance with the GPDR the underlying commercial purpose is considered ,legitimate'. The respective provider is responsible for the use of your data in compliance with data protection laws. To integrate the plug-ins we provide a 2-click method, thereby increasing the protection level for visitors of our website. a) Facebook In order to make our services more personal our website uses social plug-ins of the social network facebook.com via the LIKE or SHARE button. The offer is provided by Facebook. When you visit a website on our website that contains such a plug-in,

your browser establishes a direct connection to the Facebook servers. The content of the plug-in is transmitted directly from

Facebook to your browser and integrated into the website. By integrating the plug-ins, Facebook receives the information

that you have called up the corresponding page of our website, even if you are not a member of Facebook or if you are not

logged in to Facebook currently. This information (including you IP address) is transmitted to and stored on a Facebook

server based in the USA. If you are logged in to Facebook, Facebook can assign your visit to your Facebook account. If you

interact with the plugins, for example by pressing the like button or making a comment, the corresponding information is

transmitted directly from your browser to Facebook and stored there. This information will be published on Facebook and

also shown to your Facebook friends. Facebook may use this information for the purpose of advertising, market research and

demand driven design of the Facebook websites. To do this Facebook creates profiles of usage, interest, and relations and

uses them to evaluate your usage of our website with regard to adverts on Facebook, to inform other Facebook users about

your activities on our website, and to offer other services connected to the usage of Facebook. If you are a Facebook member

and do not want Facebook to collect data about you via our website and link it to your membership data stored on Facebook,

you must log out of Facebook before visiting our website. For the purpose and scope of data collection and the further processing and use of the data by Facebook as well as your rights and setting options for the protection of your privacy, please refer to the Facebook data protection information: (https://www.facebook.com/about/privacy). b) Twitter Into our websites, we have integrated plug-ins of the news and social networking service by Twitter Inc. (Twitter). You can recognize the Twitter plug-ins (tweet button) by the Twitter logo on our website. Click here (https://about.twitter.com/resources/buttons) to show a list of tweet buttons. When you visit a website on our website that contains such a plug-in, your browser establishes a direct connection to the Twitter server. Twitter receives the information that you with your IP address have called up the corresponding page of our website. If you click the tweet button while logged in to your Twitter account, you can link our website to your Twitter profile. In doing so Twitter can assign your visit to your Twitter account. Please note the we have no influence on the extent of the data that Twitter collects with the help of this plug-in and therefore inform you according to our level of knowledge: If you are a Twitter member and do not want Twitter to collect data about you via our website, you must log out of your Twitter account before visiting our website. For more information, please visit Twitter (https://twitter.com/privacy). c) YouTube

Our website uses plug-ins of YouTube operated by Google. The operator of these pages is YouTube, LLC, 901 Cherry Ave., San

Bruno, CA 94066, USA. When you visit a website on our website that contains such a YouTube plug-in, your browser

establishes a direct connection to the YouTube server. YouTube receives the information that you have called up the

corresponding page of our website. If you are logged in to your YouTube account, YouTube can assign your surfing behavior

to your personal profile. You can prevent that by logging out of your YouTube account. We use YouTube to provide an

appealing presentation of our online services. This is a legitimate interest persuant to Article 6 (1)(f) GDPR. For more

7. Rights of data subjects

information please refer to the YouTube privacy policy: https://policies.google.com/privacy.

objected to the processing.

data.

Persons whose data are stored at Paragon Software have the following rights: • Persuant to Article 15 GDPR the right to information about stored personal data. You have the right to ask for a copy of personal data we hold about you and to check we are dealing with it lawfully by asking for information about how we process it. This includes information about the aim of dealing with personal data, the categories of personal data, the categories of persons to whom personal data can be transferred to, the maximum storage time, the origin of data not collected by us, the existence of automated decision-making incl. profiling (in detail, if necessary), your right to correct, delete, limit or object to the processing of personal data, and your right to appeal. • Persuant to Article 16 GPDR the right to correction of inaccurate or incomplete personal data immediately. • Persuant to Article 17 GDPR the right to deletion of your personal data stored at our company. We may reject requests for certain reasons, including if the request may infringe the exercise of freedom of expression and information, our complying to legal obligations, reasons of public interest, or the establishment, exercise or defense of legal claims.

• Persuant to Article 18 GPDR the right to restriction of processing of your personal data if you contest to the accuracy of an

item of personal data, or if the processing is unlawful but you object to the deletion of the personal data although we no

longer need them because you need them to assert, exercise or defend legal claims persuant to Article 21 GPDR after having

• Persuant to Article 20 GPDR you have the right to ask us to transfer your personal data to you, or to a third party. We will

• Persuant to Article 7 (3) GPDR you have the right to withdraw at any time the consent you gave to our use of your personal

• Persuant to Article 77 GPDR the right of appeal to a supervisory authority. File your complaint with the supervisory authority

8. Right of Objection

provide the data in a structured machine-readable format as used by common word processors.

of your residence or place of employment or of our registered office.

purposes of direct marketing. In the latter case, you have the right to object without limitation. If you want to object, please send an email to dsba2018@paragon-software.com. 9. Data security

When visiting our website your data will be protected by SSL encryption technology (Secure Socket Layer) in conjunction with

the highest level of encryption that is supported by your browser. Usually this is a 256-bit encryption protection. In case your

browser does not support the 256-bit encryption, we make use of the 128-Bit v3 technology instead. A single page of our

website is transmitted encrypted, if you can see the closed exposition of a key and key symbol respectively in the lower status

bar of your browser. We use appropriate technical and organizational security measures to protect your personal data stored

by us against manipulation, partial or complete loss and against unauthorized access by third parties. Our security measures

If we process your personal data in accordance with our legitimate interests persuant to Article. 6 (1)(1)(f) GPDR you have the

right to object to this processing persuant to Article 21 GPDR, for reasons relating to your particular situation or for the

# are continuously improved in line with technological developments.

10. Topicality and Amendment of the Data Protection Declaration This data protection declaration is currently valid and dated 2018, May. This Privacy Policy may change from time to time for reasons of further development of our website and services, or due to a change in laws or regulations. Please check our

The Data Protection Policy was updated on June 11th, 2018.

website regularly for the latest version here: www.paragon-software.com/privacy/.

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**Technology Solutions** 

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STAY CONNECTED

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