**BEGINNING: Implementation & processing instructions**

(Please delete the implementation / processing instructions before using the following sample.)

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| **Implementation** and **processing instructions** |
| Sample  **Data Protection Statement (DPS) / Privacy Policy**  **for Facebook Fanpage** |
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Dear Sir or Madam,

most companies maintain social media channels such as f**acebook** to present their products and services and to provide an opportunity to contact them. When operating a facebook fanpage and the associated **tools**, certain **measures** must be implemented and regularly monitored.

One of these measures is the provision of a **data protection statement (short: DPS)** / **privacy policy** for your facebook fanpage, both on facebook itself and on your website. The DPS fulfils the information obligations on a website according to **Art. 13, 14 GDPR**. It must therefore provide all the information mentioned there, in particular the persons responsible for the website, the rights of visitors to the website and the competent supervisory authority.

Below we have prepared a sample DPS for you to have available on your fanpage and website as a privacy statement for your facebook presence.

Please do not hesitate to contact us if you have any further questions.

Best regards

Your

**netvocat® GmbH – external data protection and seminars**

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**END: Implementation & processing instructions**

(Please delete the implementation / processing instructions before using the following sample.)

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| Privacy Policy Facebook Fanpage |

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| Privacy Policy Facebook Fanpage | |
| Name of the company / companies taking part in the processing | *Please specify* |
| Date of last change | *Please specify* |
| Link | *Please specify Facebook Fanpage* |

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| **Beginning of text** Privacy Policy Facebook Fanpage |

**Controller**

We operate a so-called fanpage on the social media platform Facebook in order to communicate with the users (= fans) active there who have marked our fanpage with "Like" and to inform them about our products and services, among other things.

We have concluded an agreement with Facebook on joint responsibility in accordance with Art. 26 GDPR, which regulates the distribution of data protection obligations (<https://www.facebook.com/legal/terms/page_controller_addendum>).

In particular, Facebook assumes the obligations to inform users, to ensure data security and to report data breaches and is considered primarily as a contact for exercising the rights of the persons concerned.

**Contact details of the jointly responsible persons:**

Facebook Ireland Ltd.

4 GRAND CANAL SQUARE

GRAND CANAL HARBOUR

D2 Dublin IRELAND

Name of the company:

Street:

Postcode, City:

Phone:

Fax:

E-Mail:

**Data protection requests/ Data protection officer**

If you have any questions or need assistance in exercising your rights vis-à-vis Facebook, please contact us using the following contact details:

Name of the company:

Street:

Postcode, City:

Phone:

Fax:

E-Mail:

**Legal bases for the processing of personal data**

The data processing during the operation of the fan page is based on our legitimate interest according to Art. 6 (1) 1 (f) GDPR (information about our products and services; communication with users). If Facebook obtains the consent of users to data processing (e.g. by placing a check mark in a checkbox (checkbox) or clicking a button), the legal basis for data processing is Art. 6 (1) 1 (a) GDPR.

**Purpose of the processing**

The processing of the information generated by Insights is intended to enable us to obtain statistics that Facebook compiles on the basis of visits to our fanpage in order to control the marketing of our activity. This enables us to gain knowledge of the profiles of visitors and their usage behaviour of applications on our fanpage. This enables us to provide more relevant content and features, both within and outside of Facebook, that may be of greater interest to you.

To help us understand how our fanpage can better achieve our business goals, we also use the information we collect to analyze and share demographic and geographic data. We may use this information to display personalized advertisements without immediately knowing the identity of the visitor. If visitors use Facebook on multiple devices, the collection and analysis can also be carried out across devices if they are registered and logged in to their own profile.

Within the settings for advertising preferences, users can influence the extent to which information about their usage behavior when visiting our Facebook page may be collected (<https://www.facebook.com/ads/preferences>).

We also use our fanpage to communicate with our customers, interested parties and Facebook users and to inform them about our range of services. In this context we may receive additional information, e.g. due to user comments, private messages or because you follow us or share our content. This information is processed solely for the purpose of communication and interaction with you.

**Types of data processed**

The data processed when operating a fanpage depends on the individual settings of the user. In general, Facebook processes data that the person concerned provides himself/herself (e.g. posts, comments, activities), device information (e.g. browser type, mouse movement, GPS location) as well as information from partners who use social plug-ins or Facebook pixels, for example. In any case, unique user codes can be created from the processed data to collect and link such data.

During the operation of a fanpage, the following user behaviour in particular is recorded:

* calling up a page or a contribution or a video from a page
* Subscribe or unsubscribe to a page
* Mark a page or a post with "I like" or "I don't like it anymore"
* Recommend a page in a post or comment
* Comment, share or react to a page post (including the type of reaction)
* Hide a page contribution or report it as spam
* From another page on Facebook or from a website outside of Facebook, click a link that takes you to that page
* Move the mouse over the name or profile picture of a page to see a preview of the page contents
* Click on the web page, phone number, "Plan route" button or any other button on a page
* Information about whether you are logged in via a computer or mobile device while visiting or interacting with a page or its content

The visitor statistics created via Facebook Insights are only transmitted to us in anonymised form. We have no access to the underlying data.

**Cookies and Insights**

Facebook uses cookies and other comparable storage technologies in connection with visits to our fan page. Further information on the use of cookies by Facebook can be found at <https://www.facebook.com/policies/cookies/>.

Facebook offers the possibility to remove cookies by opting out: <https://www.facebook.com/settings?tab=ads>.

It is possible for Facebook to create entries in Local Storage, a web storage facility that allows Javascript web pages and apps to store data in the browser that is retained even after the browser window is closed. This allows more data to be stored on the device without an expiration date than when using cookies. This can reduce the data flow between client and server and thus improve the performance of applications.

**Other tools**

When operating our fan page, we use functions and tools on the basis of our legitimate interest in accordance with Art. 6 (1) 1 (f) GDPR to analyse visitor behaviour and to optimise our business model accordingly.

In detail, this involves the following functions and tools:

* Groups
* Events
* Apps
* Games
* Sweepstakes
* Newsletter
* Goods / services offered
* Facebook Business
* Analyses
* lead ads
* custom audiences
* Workplace Premium
* Other:

**Duration of storage**

Facebook stores data until it is no longer needed to provide the services and Facebook products, or until the user account is deleted, whichever comes first. This is a case-by-case determination and depends on such things as the type of data, why it is collected and processed, and relevant legal or operational storage needs.

**Recipient of personal data**

User data may be processed outside the European Union. However, Facebook is certified under the Privacy Shield Agreement and thus offers a guarantee to comply with European data protection law (<https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active>).

Further information on the purpose and scope of data collection and its processing, as well as on your rights as a data subject within the meaning of the GDPR and your options for objection and adjustment in order to protect your personal data on Facebook, can be found in the Facebook privacy statement:

Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland - Privacy Policy: <https://www.facebook.com/about/privacy/>.

**Your rights as a data subject**

If requests for information or other rights of affected persons are asserted under the GDPR, we would like to point out that these can be most effectively asserted on Facebook itself. As the operator of the fanpage, we generally have no access to the data that is processed by Facebook. Only Facebook alone can access the data of the users and therefore fully provide information or implement other measures, such as requests for deletion by users. Facebook offers a form for these purposes (<https://www.facebook.com/help/contact/367438723733209>). We can be contacted at any time to support the exercise of the rights of those affected.

Complaints can be addressed to the responsible data protection supervisory authorities (see Art. 77 GDPR):

Competent data protection authority of Facebook within the EU:

Data Protection Commission

Canal House, Station Road, Partarlington, Co. Laois, R32 AP23, Ireland

Phone: [+353 (0761) 104 800](tel:00353761104800)

LoCall: [1890 25 22 31](tel:1890252231)

Fax: +353 57 868 4757

E-Mail: [info@dataprotection.ie](mailto:info@dataprotection.ie)

Competent data protection authority of 123GmbH

Name of the company:

Street:

Postcode, City:

Phone:

Fax:

E-Mail:

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| **End of text** Privacy Policy Facebook Fanpage |

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