

## **Privacy Notice for HCM-Platform**

The following privacy notice applies to the online service HCM-Platform available at [www.safe-drone.com](http://www.safe-drone.com) and [hcm.safe-drone.com](http://hcm.safe-drone.com).

The Controller is Lufthansa Technik AG, Weg beim Jäger 193, 22335 Hamburg, Germany, E-Mail: [dsb@dlh.de](mailto:dsb@dlh.de), in the following referred to as "we" or "us".

### **1. Collection and Processing of Personal Data**

#### **1.1 General**

Personal data means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

The usage of the HCM Platform requires you to provide personal data, e.g. registration. Mandatory fields are generally denoted with an \*.

#### **1.2 Registration**

If you wish to use the HCM Platform we will ask you to register by using your SafeDrone login details (user name and password). If you have no registered account for SafeDrone yet you must register at SafeDrone first (for SafeDrone a separate Privacy Notice applies). It is not necessary to state further details while registering for the HCM Platform.

#### **1.3 Use of HCM**

In order to make use of the monitoring features of the HCM Platform you may have to enter data relating to your unmanned aerial vehicle ("UAV"). This may include basic data, such as type, serial number, registration code of the UAV ("UAV Data") as well as Flight and Sensor Data of your UAV.

Flight and Sensor Data may include technical information about accelerometers, gyroscopes, actual UAV orientation (throttle, roll, pitch, yaw), User input (throttle, roll, pitch, yaw, camera settings, landing gear status, flight mode status), airspeed,

ambient pressure, ambient temperature, barometric altitude, , information per brushless motor (PWM-signal, RPM, current, temperature) compass information (magnetic field, offsets), GPS information (VDOP, HDOP, latitude, longitude, altitude, no. of received satellites, GPS time), battery information (total voltage, voltage per cell, current, temperature, charging cycles), PID-values, S/N of components, current time, software related settings, software identifier, internal failures and events.

Furthermore, Flight and Sensor Data may include GPS-data relating to the movement of your UAV which might also allow to draw conclusions regarding the geographic position of the UAV's operator.

Apart from processing the UAV Data and Flight and Sensor Data for the purpose of providing the online service, we will only use your UAV Data and Flight and Sensor Data in an anonymized form for own analytical purposes and for the purpose of optimizing the HCM Platform.

#### **1.4 Purposes of Processing and Legal Basis for the Processing**

We process your personal data for the following purposes, based on the legal bases listed:

- Providing this online service and performance of contract following our terms of use (available at [hcm.safe-drone.com/#/tandc/terms](https://hcm.safe-drone.com/#/tandc/terms))

(Legal basis: Performance of a contract).

- Own and third party advertising as well as market research and reach measurement to the legally allowed extent or based on consent.

(Legal basis: legitimate interests; there is a legitimate interest in direct marketing as long as marketing occurs while complying with data protection and fair trade laws).

- Dispatch of an email newsletter.

(Legal basis: legitimate interests; there is a legitimate interest in direct marketing as long as marketing occurs while complying with data protection and fair trade laws).

## **1.5 Data Transfer to Third Parties, Service Providers**

### **Data Transfer to Third Parties**

Your personal data is generally only being transferred to third parties as far as this is necessary for performance of the contract, if we or the third party have legitimate interests in transferring or if you have consented to this. If data is transferred to third parties based on legitimate interests, this will be explained in this privacy notice.

Furthermore, data may be transferred to third parties as far as we are obligated to do so under statutory provisions or an enforceable decision made by an authority or a court.

### **Service Providers**

We reserve the right to use service providers in collecting or processing data. Service providers are only given personal data that is necessary for their concrete task. This means that your email address may be forwarded to a service provider so you can receive a newsletter that you ordered. Service providers may also be assigned to provide server capacity. Service providers are generally involved as so-called processors which may only process users' personal data based on our instructions.

## **1.6 Data Transfer to Non-EEA Countries**

We may also forward personal data to third parties or processors who are located outside EEA countries. In such cases we ensure prior to the transfer that the transfer is subject to appropriate safeguards (e.g., by self-certification of the recipient for the EU US Privacy Shield or by having agreed upon so-called standard data protection clauses of the European Union with the recipient) or sufficient user consent is given.

You may receive an overview of third country recipients and a copy of the appropriate or suitable safeguards in place. Please use the details provided in the contact section below.

## **1.7 Duration of Storage; Retention Periods**

We store your personal data as long as it is necessary to provide the HCM Platform and the services connected with it or as long as we have a legitimate interest in continued storage. In all other cases, we delete your personal data with the exception

of such data that we are required to retain for the purpose of contractual or statutory (e.g., taxation or commercial law) retention periods (e.g., invoices). At this point, contractual retention periods may also result from contracts with third parties.

Personal data that is only retained because it is subject to a retention period is restricted from processing until the period expires and will then be deleted.

Please note that we might **store UAV Data and Flight and Sensor Data** in an anonymized form for a longer period of time.

## **2. Log Files**

Every time you use the internet, your internet browser automatically transmits certain information which is then saved by us in log files.

We save log files for the purposes of determining disruptions and for security reasons (e.g. to investigate attack attempts) for a period of 7 to 10 days and delete them thereafter. Log files which have to remain stored for evidence purposes are excluded from deletion until the respective incident has been finally resolved and may be forwarded to investigating authorities on a case-by-case basis.

Log files contain especially the following information:

- IP address (internet protocol address) of the terminal device which is used to access the online service;
- Internet address of the website from which the online service is accessed (so-called URL of origin or referrer URL);
- Name of the service provider through which access to the online service occurs;
- Name of accessed file or information;
- Date and time and duration of access;
- Amount of data transmitted;
- Operating system and information on the internet browser used, including add-ons installed (e.g., for the Flash Player);

- http status code (e.g. “request successful” or “file not found”).

### **3. Cookies**

#### **3.1 What are Cookies?**

Cookies are little text files that are sent when visiting an internet page and are stored in a user’s browser. In case the respective internet page is accessed once again, the user’s browser sends back the content of the cookies and, thus, allows for the recognition of the user. Certain cookies are automatically deleted upon ending the browser session (so-called session cookies), others are saved for a set time or permanently in the user’s browser and delete themselves thereafter (so-called temporary or persistent cookies).

#### **3.2 Which Files are Saved in the Cookies?**

Cookies generally do not contain personal data, but instead only an online ID.

#### **3.3 How can you Avoid the Usage of Cookies or Delete Cookies?**

You can deactivate the storage of cookies through your browser settings and you may delete cookies that have already been saved in your browser at any time. Please take note that this online service might not be functional without cookies or the functionality might be reduced.

Please take note that refusing to allow the creation of usage profiles partially works through „opt out cookies“. In case you delete all cookies, an objection might, under certain circumstances, no longer be considered or be valid and would have to be restated.

#### **3.4 What Cookies do we use?**

##### **Cookies Strictly Necessary for a Service**

Some cookies are strictly necessary so we can host our online service safely. This category includes, e.g.,

- Cookies which serve the purpose of identifying or authenticating our users;

- Cookies that temporarily store certain user entries (e.g., shopping basket content or content of an online form);
- Cookies that remember certain user preferences (e.g., search query and language settings);
- Cookies that store data to ensure the uninterrupted playback of video and audio content.

### **Analytics Cookies**

We use analytics cookies to record and statistically evaluate our users' usage behavior (e.g., clicked ad banners, visited subpages, search queries asked).

## **4. Web Analysis**

We need statistical information about the usage of our online service to design them to be user-friendlier and to perform reach measurements and market research. For this purpose, we use the web analysis tools described in this section.

The usage profiles created by these tools using analysis cookies or by evaluating log files are not combined with personal data. The providers of the tools (vendors) process data only as processors subject to our directives and not for their own purposes. The tools either do not use user IP addresses at all or shorten them immediately after obtaining them. You will find information on each tool's vendor and how you are able to object to the collection and processing of data that is done with the tool.

Please note that tools which use opt out cookies, the opt out function is related to a device or browser and is thus valid for the terminal device or browser used at this time. In case you use several terminal devices or browsers you must opt out on every device and in every browser used.

Additionally, you can generally avoid the creation of usage profiles by generally deactivating cookie usage.

### **Google Analytics**

Google Analytics is provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). We use Google Analytics with the additional function offered by Google to anonymize IP addresses. While doing so, Google already shortens IPs within the

EU in most cases and only does so in the United States in exceptional cases, while always saving shortened IPs only.

You may object to the collection or processing of your data by using the following link to download and install a browser plugin: <http://tools.google.com/dlpage/gaoptout?hl=en>.

## **5. Google Maps**

The HCM Platform may include third-party content from Google Maps to visualize geographical information. While using Google Maps Google may collect and process data relating to the use of Google Maps by you. We do not have any influence on the processing of data by Google. Further details regarding the processing of data by Google can be found here: <https://www.google.com/policies/privacy/>

## **6. Newsletter with Registration; Right of Revocation**

You may subscribe to our newsletter. You can withdraw your respective consent at any time. To do so, please use the unsubscribe link located at the end of each newsletter or contact us via the information provided in the contact section below.

## **7. Users' Rights (Rights of the Data Subject)**

You have the right to receive information as well as – under certain prerequisites – the rights to correction, deletion, restriction of processing or objection to personal data processing and – from 25 May 2018 onwards – the right to data portability.

### **Right to object against direct marketing and legitimate interest**

Additionally, you may at all times object to the processing of your personal data for advertising purposes ("advertisement objection"). Please take into account that, due to logistical reasons, there might be an overlap between your objection and the usage of your data within the scope of a campaign which is already running.

Furthermore, you may have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on the legal base legitimate interests.

In case you consented to the processing of your data, you can always revoke this consent at any time. The lawfulness of processing based on consent before its withdrawal remains unaffected.

To enforce your rights, please use the details provided in the contact section below. When doing so, please ensure that it is possible to clearly and unambiguously identify you.

Alternatively, you may use the settings in your user account to correct data stated at your registration or to declare your objection to direct marketing.

You may also delete your user account yourself by doing the following:

Register by using your login details (user name and password) on SafeDrone ([www.safedrone.com](http://www.safedrone.com)) and delete your user account in the profile management.

Please note that your data will be initially restricted from processing only if obligatory retention periods do not allow us to delete the data immediately.

## **8. Right to Complain with the Regulatory Authority**

You have the right to file a complaint with a data protection authority. You can appeal to the data protection authority, which is competent for your place of residence or your state or to the data protection authority which is competent for us. The latter is:

Der Hamburgische Beauftragte für Datenschutz und Informationsfreiheit

Klosterwall 6 (Block C), 20095 Hamburg

Tel.: (040) 4 28 54 - 40 40

E-Fax: (040) 4 279 - 11811

E-Mail: [mailbox@datenschutz.hamburg.de](mailto:mailbox@datenschutz.hamburg.de)

## **9. Contact**

We and our data protection officer are available for your inquiries and suggestions regarding data protection at the email address [dsb@dlh.de](mailto:dsb@dlh.de).

If you want to contact us, you can reach us as follows:

Lufthansa Konzerndatenschutz-Beauftragte: Dr. Barbara Kirchberg-Lennartz

Deutsche Lufthansa AG

Abt.: FRA/CGN RD



Airportring

60546 Frankfurt

E-Mail: [dsb@dlh.de](mailto:dsb@dlh.de)