

Privacy Notice

1 Privacy notice

This privacy notice explains the nature, scope and purpose for processing the personal data (hereinafter referred to as “data”) of our website visitors, interested parties, customers and suppliers, event participants, and applicants. With regard to the terms used, such as “processing” or “controller”, we refer to the definitions given in Art. 4 of the General Data Protection Regulation (GDPR).

1.1 Controller

The GANTNER Group company with which you maintain a business relationship or to which you transfer your data is responsible for processing your data. A list of GANTNER Group companies can be found on our website in the company / locations area.

GANTNER Electronic GmbH, named in the imprint, is responsible for data collection on this website. Should you have any questions regarding the processing of your data or wish to assert your rights and remedies with regard to data protection, please email [privacy\(@\)gantner.com](mailto:privacy(@)gantner.com).

1.2 Data protection officer

Belgium / Netherlands / England:

GANTNER NV
Ter Waarde 50/4A
8900 Ypres, Belgium
Contact: privacy@gantner.be

Germany:

Riske IT GmbH
Pascal Riske
Keldenicher Straße 23
50389 Wesseling, Germany
Contact: datenschutz@riske-it.de

Austria:

Graf Consultings GmbH
Karwendelstr. 7
86949 Windach, Germany
Contact: datenschutz@gc-gmbh.com

1.3 Types of data processed:

- Contact data (e.g. name, email, telephone numbers)
- Usage data (e.g. websites visited, interest in content, access times)
- Meta/communication data (e.g. device information, IP addresses)

1.4 Categories of data subjects

Visitors and users of the online content.

1.5 Purpose of processing

- Provision of the online content, its functions and content
- Responding to contact inquiries and communication with users
- Security measures

1.6 Terms used

"Personal data" refers to any information relating to an identified or identifiable natural person (hereinafter "data subject"); a natural person is considered as identifiable if they can be identified directly or indirectly, in particular by means of assignment to an identifier such as a name, to an identification number, to location data, to an online identifier (e.g. cookie), or to one or more particular characteristics that are the expression of the physical, physiological, genetic, mental, economic, cultural, or social identity of this natural person. "Processing" refers to any process carried out with or without the use of automated procedures or any such series of processes in connection with personal data. The term is applied broadly and includes practically any handling of data.

2 Relevant legal basis

In accordance with Art. 13 GDPR, we would like to inform you about the legal basis for our data processing. If the legal basis is not specified in the privacy notice, the following applies: The legal basis for obtaining consent is Article 6 Para. 1 (a) and Art. 7 GDPR, the legal basis for processing in the performance of our services and the execution of contractual measures, as well as for responding to inquiries, is Art. 6 Para. 1 (b) GDPR, the legal basis for processing in order to fulfill our legal obligations is Art. 6 Para. 1 (c) GDPR, and the legal basis for processing in order to safeguard our legitimate interests is Article 6 Para. 1 (f) GDPR. In the event that crucial interests of the data subject or any other natural person require the processing of personal data, Art. 6 Para. 1 (d) GDPR serves as the legal basis.

2.1 Cooperation with contractual processors and third parties

If, as part of our processing, we disclose data to other persons and companies (order processors or third parties), transmit data to them, or otherwise grant access to the data, this is done only on the basis of a legal permission (e.g. if a transmission of the data to third parties, or to payment service providers, pursuant to Art. 6 Para. 1 (b) GDPR is necessary to fulfill a contract), which you have granted, a legal obligation requires this, or on the basis of our legitimate interests (e.g. when commissioning agents, web hosters, etc.). Provided that we commission third parties to process data on the basis of so-called "order processing agreements", this is carried out on the basis of Art. 28 GDPR.

2.2 Transmissions to third countries

If we process data in a third country (meaning outside the European Union (EU) or the European Economic Area (EEA)) or in the context of using third party services or disclosing or transmitting data to third parties, this will only be done to fulfill our (pre)contractual obligations, on the basis of your consent, on the basis of a legal obligation, or on the basis of our legitimate interests. Subject to legal or contractual allowances, we will process data in a third country only if the special conditions of Art. 44 (ff) GDPR exist. This means that processing will only occur on the basis of specific guarantees, such as the officially recognized level of EU data protection or in compliance with officially recognized special contractual obligations (so-called "standard contractual clauses").

2.3 Rights of the data subject

You have the right to request confirmation on whether related data is processed as well as information on this data and further information on copies of the data in accordance with Art. 15 GDPR. According to Art. 16 GDPR, you have the right to request completion of data that pertains to you or correction of incorrect data that pertains to you. According to Art. 17 GDPR, you have the right to request the immediate erasure of data that pertains to you, or, according to Art. 18 GDPR, request a limitation on processing this data. You have the right to demand that data pertaining to you, which you have provided to us, be obtained in accordance with Art. 20 GDPR and request its transmission to other responsible parties. You also have the right, according to Art. 77 GDPR, to submit a complaint to relevant regulatory authorities.

You can exercise your rights at any time by emailing the following address: [privacy\(@\)gantner.com](mailto:privacy(@)gantner.com). or [privacy\(@\)gantner.be](mailto:privacy(@)gantner.be).

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2.4 Right of revocation

You have the right, according to Art. 7 Para 3. GDPR, to revoke consent given with effect for the future.

2.5 Right of objection

You can refuse the future processing of data pertaining to you at any time according to Art. 21 GDPR. In particular, you may object to processing for purposes of direct advertising.

2.6 Cookies and right of refusal for direct advertising

Cookies are small files that are saved to a user's computer. Various pieces of information can be stored in cookies. A cookie primarily serves to save information on a user (or the device on which the cookie is stored) during or after a user makes use of online content. Temporary cookies, or session cookies or transient cookies, are cookies that are erased after a user leaves a website and closes their browser. Such a cookie may contain, for example, the contents of a shopping cart on an online shop or a login status. "Permanent" or "persistent" cookies remain saved even after the browser is closed. This allows the login status to be saved if the user visits again after several days. These cookies can also contain the user's interests, which are used to measure reach or for marketing purposes. Third-party cookies are cookies that are provided by parties other than the data controller administering the online content (otherwise, when speaking of just the controller's cookies, the term "first-party cookie" is used). We use temporary and permanent cookies and provide an explanation of such as part of our privacy notice. If the user does not want their cookies to be saved to their device, we request that they deactivate the corresponding option in their browser settings. Saved cookies can be deleted in your browser's settings. Preventing the use of cookies can lead to limited functionality with respect to this online content. Various services provide information on how to make a general objection to the use of cookies used for online marketing purposes, especially in the case of tracking: via the US website <http://www.aboutads.info/choices/> or the EU site <http://www.youronlinechoices.com/>. In addition, you can turn off the saving of cookies in your browser settings. Please note that this may prevent you from making full use of this online content.

2.7 Erasure of data

We erase the data we process, or limit the processing of such, in accordance with Art. 17 and 18 GDPR. Unless explicitly stated in this privacy statement, the data we store will be deleted as soon as it is no longer necessary for its intended purpose and this deletion does not conflict with any statutory storage requirements. If this data is not deleted because it is required for other and legally-permitted purposes, its processing will be limited. This means that the data will be locked and not used for other purposes. This also applies to data that must be stored for commercial or tax reasons. According to legal requirements in Germany, this storage period is 6 years in particular according to § 257 Para. 1 HGB (trading books, inventories, opening balance sheets, annual financial statements, commercial letters, accounting documents, etc.) and 10 years according to § 147 Abs. 1 AO (books, records, management reports, accounting documents, commercial and business letters, tax documents, etc.). According to legal requirements in Austria, this storage is 7 years in particular according to § 132 Para. 1 BAO (accounting documents, receipts/invoices, accounts, documents, business papers, statement of income and expenses, etc.), 22 years in connection with real estate, and 10 years in the case of documents related to electronically supplied services, telecommunications, broadcasting and television services provided to non-EU companies in EU Member States for which the Mini-One-Stop-Shop (MOSS) is used.

2.8 Hosting

The hosting services we utilize serve to provide the following services: Infrastructure and platform services, computing capacity, storage space, and database services, security services, as well as technical maintenance services that we utilize for the purpose of administering this online content. Here, we, or our hosting providers, process inventory data, contact data, content data, contract data, usage data, and meta and communication data of customers, interested parties, and visitors to this online content on the basis of our legitimate interests in the efficient and secure provision of this online content pursuant to Art. 6 Para. 1 (f) GDPR in connection with Art. 28 GDPR (closing of order processing agreement).

2.9 Collection of access data and log files

We, or our hosting provider, collects data on every access to the server on which this service is located (so-called server log files) on the basis of our legitimate interests in the sense of Art. 6 Para. 1 (f) GDPR. This access data includes the name of the web page retrieved, file, date, and time of retrieval, amount of data transferred, notification of successful retrieval, browser type and version, the user's operating system, referrer URL (the page previously visited), IP address, and the requesting provider. Log file information is stored for security purposes (e.g. to investigate abusive or fraudulent activities) for a maximum of 7 days and then deleted. Data whose further storage is required for evidence purposes is excluded from erasure until the incident is finally resolved.

3 Making contact

When contacting us (e.g. via the contact form, email, telephone, or social media), the user's information is processed in order to handle and settle the contact request in accordance with Art. 6 Para. 1 (b) GDPR. The user's information may be saved in a customer relationship management system ("CRM-System") or similar inquiry organization system. We delete requests as soon as they are no longer required. We review their necessity every two years. In addition, legal archiving obligations apply.

4 Support request

You can submit your request to our support department using the support form on our website.

4.1 Categories of data processed

When submitting the support form, all the data you have entered will be stored. This includes:

- Name
- Email
- Telephone
- Company
- Message

4.2 Purpose of processing and legal basis for processing

The data is processed in a service management system in order to handle your support request and to contact you in this regard. If you do not provide us with all the necessary information, we may not be able to process your request.

The legal basis for data processing in connection with your support request is our legitimate interest (Art. 6 Para. 1 lit. f GDPR) in the processing of support requests and in the maintenance of the business relationship with you.

4.3 Recipient of data

In order to satisfy the purpose of processing described above, your data may also be transferred to GANTNER Group companies. If data processing tasks are carried out by GANTNER Group companies outside the EU or the EEA, the appropriate level of data protection results from an adequacy decision by the European Commission pursuant to Art. 45 GDPR or from measures pursuant to Art. 44 ff. GDPR.

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4.4 Retention period

Your personal data will be deleted insofar as it is no longer required to fulfill the purpose of storage and no statutory retention obligations (e.g. commercial and tax retention obligations) or the assertion of legal claims prevent this deletion.

5 Partner login / registration

GANTNER partners can register for the partner login on our website in order to gain access to all information related to the technical and marketing details of our products.

5.1 Categories of data processed:

As part of the registration process, all the data you have entered (*mandatory fields*) will be saved. This includes:

- *Email*
- *Password*
- *Form of address*
- *First and last name*
- *Company*
- *Address (street, town, state, postcode)*
- *Country*
- *Telephone*
- *GANTNER contact person*

5.2 Purpose of processing and legal basis for processing

The data is used to manage your partner account and give you access to the information provided. For important changes, for example to the scope of the offer or for technically necessary changes, we use the email address provided during registration in order to inform you of such. If you do not provide us with all the necessary information (mandatory fields), we may not be able to check whether you are authorized to register for the partner login.

The legal basis for data processing with regard to handling your partner request is our overriding legitimate interest in accordance with Art. 6 Para. 1. lit. f) in maintaining the business relationship with you.

5.3 Retention period

The personal data collected in connection with registering for the partner login is stored for the duration of the registration and then deleted. In addition, only data that is absolutely necessary due to applicable legal provisions or retention obligations is stored.

6 Partner request

Companies wishing to become GANTNER partners can send us their request using the corresponding form on the website.

6.1 Categories of data processed

When submitting the form for the partner request, all the data you have entered will be stored. This includes:

- *Company*
- *Form of address*
- *Contact details*

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- Company profile
- Number of employees in various departments
- References
- Geographic market
- Represented companies
- Revenue
- Reasons for integrating GANTNER products and solutions

6.2 Purpose of processing and legal basis for processing

The data is processed in order to process your partner request and to contact you in this regard. If you do not provide us with all the necessary information, we may not be able to process your request.

The legal basis for data processing with regard to handling your partner request is our overriding legitimate interest in accordance with Art. 6 Para. 1. lit. f) in maintaining the business relationship with you.

6.3 Retention period

The personal data collected in connection with the partner request is stored for the duration of the business relationship and then deleted. In addition, only data that is absolutely necessary due to applicable legal provisions or retention obligations is stored.

7 Newsletter

By subscribing to our newsletter, you provide your agreement to receive such and your agreement with the processes described. We send out newsletters, emails, and other electronic messages with advertising information (hereinafter "newsletter") only with the consent of the recipient or legal permission to do such. If the content of a newsletter is concretely described when subscribing to the newsletter, this content is decisive for the consent of the user. Apart from that, our newsletters contain information on us and our services.

Interested parties register for our newsletter via a so-called double out-in procedure. This means that, after registration, they receive an email requesting confirmation of their registration. This confirmation is necessary to prevent anyone from registering with email addresses that are not their own.

7.1 Categories of data processed

When registering for the newsletter, all you need to provide is your email address. We will also request that you optionally provide your name for the purpose of personally addressing the newsletter.

Registrations to the newsletter are logged in order to be able to prove the registration process in accordance with legal requirements. This includes saving the time of registration and confirmation as well as the IP address. Similarly, changes to your data stored with the dispatch provider will be recorded.

In addition, we analyse our newsletter campaigns with the help of a newsletter management system. For example, we can determine whether and when a newsletter was opened and how often a link in a newsletter was clicked. We use these analyses to be able to optimise the newsletter dispatch and the content of the newsletter. If you do not want any analysis, you must unsubscribe from the newsletter. You can unsubscribe by clicking on the "unsubscribe link" in the newsletter or by sending a corresponding message to [privacy\(@\)gantner.com](mailto:privacy(@)gantner.com)

7.2 Purpose of processing and legal basis for data processing

The dispatch of the newsletter and related data analysis is based on the recipient's consent according to Art. 6 Para. 1 (a), Art. 7 GDPR. The registration process is recorded on the basis of our legitimate interests according to Art. 6 Para. 1 (f) GDPR. Our interest is based on the use of a user-friendly and secure newsletter system that both serves our commercial interests and meets the expectations of the user, as well as allowing us to prove consent.

Cancellation/ Revocation

You can cancel the receipt, or revoke your consent, of our newsletter at any time. You can unsubscribe by clicking on the "unsubscribe link" in the newsletter or by sending a corresponding message to [privacy\(@\)gantner.com](mailto:privacy(@)gantner.com).

7.3 Recipient of data

For the distribution of the newsletter and the associated analyses we use an external service provider. We have obligated this service provider to comply with the applicable data protection regulation by concluding a data processing agreement in accordance with Art. 28 GDPR.

7.4 Retention period

We may save the email addresses provided for up to three years on the basis of our legitimate interests, before we erase them for the purpose of sending out the newsletter, in order to provide evidence of prior consent. The processing of this data is limited to the purpose of potential defense against claims. You may request an individual erasure at any time, provided the former existence of consent is confirmed at the same time.

8 Business relationships with interested parties, customers and suppliers

In the following explanations, we inform our interested parties, customers and suppliers about the processing of personal data as part of the business relationship.

8.1 Categories of data processed

Depending on our business relationship with you, we may process the following data:

- Master data of the company (e.g. company, industry)
- Bank details
- Contract data
- Invoice data
- Payment data, such as details required to process payment transactions or to prevent fraud
- Data related to tax liability and tax calculation
- Credit rating data
- Your contact person's data: professional contact details (e.g. name, professional contact address, professional telephone number and email address), function, powers of representation, business cases handled, image data from indicated video surveillance
- Other personal data whose processing is necessary for initiating, processing and managing (contractual) business relationships as well as for the maintenance of business relationships, or data that is provided voluntarily by you (e.g. orders placed, order details, requests made or project details, communication data, other data about the cooperation)

8.2 Purpose of processing and legal basis for data processing

Depending on your business relationship with us, we process your data for different purposes and on different legal bases:

a. Interested parties

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We process your data for the implementation of pre-contractual measures, including pre-contractual communication. The legal basis is our legitimate interest (Art. 6 Para. 1. lit. f GDPR) in the implementation of pre-contractual measures upon your request.

b. Customers / suppliers

We process your data for the fulfillment of contracts concluded with you, including contractual communication, exchanges of services, and payment processing in this context. Processing takes place on the basis of our legitimate interest (Art. 6 Para. 1 lit. f GDPR) in the fulfillment of these contracts.

The purpose of processing image data from video surveillance is to monitor locations subject to our authority. The legal basis for processing this image data arises from our overriding interest in the protection of property, responsibility, and prevention as well as in the fulfillment of general security standards.

c. Customer

In addition to processing data to handle requests and orders, we also use the data to carry out marketing measures in connection with products and services you have purchased, such as marketing campaigns with recommendations on products and services, customer surveys, market analyses and events, by email or by post. The purpose of processing personal data in this context is for us to inform you about current product-related developments. The legal basis for the processing arises from our overriding legitimate interest (pursuant to Art. 6 Para. 1. lit. f) to achieve the described purpose.

You may object to the use of personal data for advertising purposes at any time by emailing [privacy\(@\)gantner.com](mailto:privacy(@)gantner.com). Withdrawal of consent shall not affect the lawfulness of the processing carried out on the basis of consent until revocation.

8.3 Recipient of data

a. Interested parties

Your data may be transferred to GANTNER Group companies if this is necessary for the fulfillment of the purposes described above.

b. Customer

In the event of the conclusion of a contract, data may be transmitted to the following recipients as necessary:

- GANTNER Group companies, insofar as this is necessary to fulfill the purposes described above
- Tax consultants and auditors, insofar as this is necessary for the fulfillment of their duties
- Subcontractors / suppliers involved in the provision of our service insofar as this is necessary for the fulfillment of their respective duty
- Administrative and financial authorities
- Legal representatives in matters related to default and collection, insofar as this is necessary for the performance of their duties
- Courts
- IT service providers

c. Suppliers

We may share supplier data with the following recipients:

- GANTNER Group companies, insofar as this is necessary to fulfill the purposes described above
- Banks for processing payment transactions
- Tax consultants and auditors, insofar as this is necessary for the fulfillment of their duties
- Customers, as recipients of your services
- Administrative and financial authorities
- Legal representatives in matters related to default and collection, insofar as this is necessary for the performance of their duties
- Courts
- IT service providers

8.4 Retention period

Data that we process on the basis of your consent will be retained until we receive your withdrawal of consent and beyond this for as long as statutory periods stipulate.

Insofar as no explicit storage period is specified during collection, your personal data will be deleted, provided that it is no longer required to fulfill the purpose of storage and no statutory retention obligations (e.g. commercial and tax retention obligations) or the assertion of legal claims prevent erasure.

We do not store image data from video surveillance for longer than 72 hours, unless longer storage is necessary and proportionate (for example, criminal behavior has been recorded, which must be reported accordingly, cf. § 13 Para. 3 DSG).

9 Organization of GANTNER Academy events

The GANTNER Academy organizes events (e.g. technical training courses, webinars) to convey comprehensive, detailed and professional knowledge as well as know-how about GANTNER solutions and products. In order to carry out the events, the processing activity described below takes place in addition to the data processing described under point 8.

9.1 Categories of data processed

In order to organize GANTNER Academy events, we process the following personal data:

- Contact details of the event participant
- Information on the event participant's employment relationship (company, position)
- Voluntarily disclosed information (e.g. allergies, food intolerances) of the event participant
- If necessary, data for the organization of an overnight stay (e.g. arrival and departure dates, possible preferences and payment information, if applicable)
- Other personal data provided or arising in connection with the organization of and participation in the event (e.g. type of event, arrival and departure, correspondence)
- Image data from attendance at events

9.2 Purpose of processing and legal basis for data processing

Data is processed based on our legitimate interest (Art. 6 Para. 1. lit. f) in the organization and implementation of events. The disclosure of special categories of personal data (e.g. allergies) is optional. We process this data exclusively on the basis of your consent (Art. 6 Para. 1 lit. a).

With regard to image data from attendance at events, the purpose of the processing is public relations and publication on our website or social media channels or through our communications (e.g. newsletters). The processing of image data from participation in events is done on the basis of our legitimate interest in providing reports with images, unless the interests or fundamental rights and freedoms of the data subject, which require the protection of personal data, prevail (Art. 6 Para. 1 lit. f GDPR).

9.3 Recipient of data

We will not disclose the personal data we collect to third parties without your consent, unless this is necessary or legally/officially required to fulfill our obligations.

9.4 Retention period

Insofar as no explicit storage period is specified during collection (e.g. as part of a declaration of consent), your personal data will be deleted or anonymized, provided that it is no longer required to fulfill the purpose of storage and no statutory retention obligations (e.g. commercial and tax retention obligations) or the assertion of legal claims prevent erasure.

10 Applications

The data protection information for applications applies both to the application form on our website and to unsolicited applications or applications to us via another method. The GANTNER Group company named in the job advertisement is responsible for data processing.

10.1 Categories of data processed

We process the data of applicants who enter such in the application form or make such available to us in another way (e.g. by email) in the course of the application process. In particular, this includes master data, contact data, and data from application documents such as CVs, photos, or certificates.

The provision of data marked as mandatory fields (name, email, message) in the application form is required to process an application. This data is required to complete the application process.

10.2 Purpose of processing and legal basis for data processing

The data is used to conduct the application process, in particular to check applications, to contact the applicant, and to conduct interviews in order to select persons appropriate for the positions open at our company.

The lawfulness of data processing results from the pre-contractual measure associated with the applicant's request pursuant to Art. 6 Para. 1 lit. f GDPR.

10.3 Recipient of data

Some of the GANTNER Group companies mentioned above are located outside the EU or the EEA and process personal data there. However, we only transfer the applicant's personal data to countries which the EU Commission has decided have an adequate level of data protection. Alternatively, we implement measures pursuant to Art. 44 ff. GDPR in order to ensure that all recipients guarantee an adequate level of data protection.

We may also transfer personal data to our processors (e.g. IT service providers) in the EU during the application process.

10.4 Retention period

If an employment contract is concluded, your personal data for the performance of the employment relationship will be stored in compliance with statutory provisions.

Otherwise, the data will be stored by us for evidence purposes for the establishment, exercise or defense of any legal claims for a period of 7 months from the date of the refusal letter. The data will then be deleted, unless further storage would be necessary to defend against claims or if the applicant explicitly consents to further storage. The legal basis for retention for evidence purposes is our legitimate interest, pursuant to Art. 6 Para. 1 lit. f GDPR, in the exercise or defense of legal claims.

11 Links to other websites

This privacy notice applies only to our own internet presence. The web pages of this presence may contain links to third-party websites. Our privacy notice does not apply to these websites. When you leave our website, we recommend carefully reading the privacy policy of each individual website that collects personal data.

12 Online presences in social media

We maintain online presences on social networks and platforms in order to communicate there with active customers, interested parties, and users, and to inform them there of our services. When calling up the

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respective networks and platforms, the terms and conditions and data processing guidelines of the respective operators apply.

Unless otherwise specified in our privacy notice, we process user data if they communicate with us on social networks and platforms, e.g. if they submit posts on our online presence or send us messages.

13 Google Analytics

This website uses the service "Google Analytics", which is offered by Google Inc. (1600 Amphitheatre Parkway Mountain View, CA 94043, USA) to analyse website usage by users. The service uses "cookies" - text files that are stored on your device. The information collected by the cookies is usually sent to a Google server in the USA and stored there.

IP anonymisation is used on this website. The IP address of the user is shortened within the member states of the EU and the European Economic Area. This shortening eliminates the personal reference of your IP address. Under the terms of the data processing agreement between the website operators and Google Inc., Google Inc. uses the information collected to evaluate website usage and activity and to provide services relating to internet usage.

You have the option of preventing the cookie from being stored on your device by making the appropriate settings in your browser. It is not guaranteed that you will be able to access all functions of this website without restrictions if your browser does not allow cookies.

Furthermore, you can use a browser plug-in to prevent the information collected by cookies (including your IP address) from being sent to and used by Google Inc. The following link will take you to the corresponding plugin: <https://tools.google.com/dlpage/gaoptout?hl=en>

Here you will find further information on the use of data by Google Inc.: <https://support.google.com/analytics/answer/6004245?hl=en>

Alternatively, you can prevent Google Analytics from collecting data about you within this website by clicking on ` this link`. By clicking on the above link, you will download an "opt-out cookie". Your browser must therefore generally allow cookies to be stored for this purpose. If you delete your cookies regularly, you will need to click on the link again each time you visit this website.

Valid as of March 2021