

DACH Marcom Services Privacy Policy (Status March 2020)

For translation purposes only /
Only the German version is legally binding



This privacy policy for Marcom Services describes how Tech Data processes your personal data ("data") in connection with Marcom Services. This Privacy Policy applies to competitions and campaigns, virtual events, in particular online seminars, provision of content and similar matters ("Marcom Service(s)"). Marcom Services can supplement them with specific data privacy information.

1. Who is the data controller for your data?

The controller within the meaning of the data privacy laws for data processing within the framework of your registration and participation in the Marcom Service is the hosting Tech Data company ("Tech Data" or "we") as set out in the Marcom Service Terms and Conditions, including the General Terms and Conditions for Marcom Services and the Marcom Service(s) website.

2. What personal data is processed in connection with the Marcom Service(s) and for what purposes? On what legal basis?

Unless otherwise expressly described below, the legal basis for the respective processing of your personal data is Art. 6 para. 1 S. 1 lit. b) GDPR (the fulfillment of the participation contract concluded with you for the provision of the corresponding Marcom Service(s) and functions).

a. Registration and participation

We use the registration data to organize your participation and to carry out the Marcom Service(s) in order to be able to provide you with contents and functions of Marcom Services. Depending on Marcom Service(s), we will contact you by email or phone before the program to confirm your registration if there are questions or to provide you with any other relevant information about and in connection with the program.

Once you have successfully registered for a Marcom Service, you can use the contents and functions of the Marcom Service(s) you have registered for. We process registration data in this regard in order to be able to authenticate you as a registered participant.

Upon completion of a Marcom Service(s), we will contact you by email or phone for your feedback on the program in order to review the acceptance of our Marcom Service(s), to improve our services and performance and to answer any questions you may have. The legal basis is Art. 6 para. 1 S. 1 lit. f) GDPR (for balancing interests, our interest is to get an idea of the topic dealt with in the Marcom Service and to constantly further optimize our offer and our services and to adapt to customer needs).

b. Chat and other communication functions

Insofar as you use the chat, email, audio or video functions offered within the scope of Marcom Service(s), in particular during online seminars or other virtual events, and refrain from using an alias, for the technical processing of communications ("communication data"), we process your name, your email address, audio and video material as far as relevant within the scope of the function, time of communication, recipients (one or more visitors and their names), type and content of communication, and the profile data you share.

If personal data are processed within the framework of recordings, this is done on the basis of your previously granted consent (Art. 6 para. 1 S. 1 lit. a) GDPR).

c. Function for retrieving contents/ attending virtual Marcom Service(s)

Depending on the Marcom Service(s), we present content on technical topics or also on products and services of Tech Data or our suppliers or business partners, e.g. in the form of online seminars or other virtual events, via download option or video, or in the form of virtual presentations via links.

If you use these functions, we process the following data from you ("retrieved data"): Your name, date, time and duration of the retrieval of contents or attendance at an online seminar or virtual event; description of the retrieved content; number of your retrievals.

The processing of this data is done to enable you to use the aforementioned functions, i.e. to enable you to participate in an online seminar or to display a presentation by video.

For online seminars or virtual events, we use communication or video conferencing providers such as Zoom, Cisco Webex, Google Meet or MS Teams to provide our Marcom Service(s) services. These are US companies.

The basis for data processing in connection with these companies is Art. 49 para. 1 (b) GDPR (data transfer is necessary for the implementation of the participation contract with you).

d. Participation in contests, campaigns or similar promotions

If you participate in a competition, campaign or similar promotion offered by us, such as a contest or awarding of give-aways, we process the personal data required to verify your eligibility to participate in accordance with the respective promotion-related terms and conditions of participation, in addition to your name and the contact details provided by you (for example, your answers to quiz questions, your Marcom Service(s) registration

and participation, your retrieval of Marcom Service contents), and to determine whether you have won according to the respective conditions.

If this is the case, we will use your contact details to inform you about the winnings, prize or give-aways. We will only use the address you have entered to send you the winnings, give-away or prize.

e. Participation in surveys

If you participate in a survey offered by us, we collect the data requested there for the survey purposes mentioned there, i.e. your suggestions for further optimization of our Marcom Service(s). The purpose and data categories required for this differ depending on the survey.

The legal basis is Art. 6 para. 1 S. 1 lit. f) GDPR (for balancing interests, our interest is gaining an idea of the subject matter queried in the survey and constantly optimizing our Marcom Service(s) offer and our services and adapting to customer needs).

f. Sponsoring/Abrechnung

Some Marcom Service(s) are financially supported by our suppliers. We process your registration data, retrieved data and participation data for internal preparation of the billing with the suppliers.

The legal basis for this is Art. 6 para. 1 S. 1 lit. f) GDPR (we are interested in correctly preparing supplier invoices).

g. Use of your data for advertising purposes

Through us: If we request your consent during registration or at a later date, or you have to submit it in return for the retrieval of content, and you provide it, we will use your data within the framework of your consent (under data privacy law and for direct marketing purposes) to send you marketing offers, newsletters, surveys and invitations by email, text messages, telephone calls and postal mail as described in the wording of the respective declaration of consent. The legal basis is Art. 6 para. 1 S. 1 lit. a) GDPR.

In relation to the retrieval of our Marcom Services, we process your registration data in order to inform you by postal mail, telephone or email about news in connection with the Marcom Service(s) during the course of a Marcom Service(s), as well as upcoming events and changes in this regard, but also about offers or promotions of the suppliers or about us in connection with the respective Marcom Service, as well as the contents of (a) newly discontinued Marcom Service(s). After completion of a Marcom Service(s), we also process these data to inform you by email, telephone call or postal mail about new upcoming Marcom Service(s) on the same topic or similar topics. To be able to design this as individually and personally as possible, it is necessary for us to process your admission and retrieved data in addition to your registration data for the appropriate selection and the most personalized compilation possible.

The legal basis for this processing of your personal data for selection and personalization is Art. 6 para. 1 S. 1 lit. f) GDPR (for the balancing of interests, we are interested in compiling and providing information that is as suitable and customized as possible for you).

The legal basis for reaching out you by email or text message, if applicable, is your consent, or in Germany Section 7 para. 3 of the German Unfair Competition Act (UWG) and corresponding national law in Austria and Switzerland. You have a right to object to the use of your email address for advertising purposes.

By third parties: If you have given your express consent, we will pass on your data (company, address, business email, telephone, last name and first name) to suppliers and/or our business partners for direct marketing purposes. A meaningful allocation for you and our partners is sometimes only possible after completion of a Marcom Service(s). In this case, we will provide you with the information upon request after completion of the Marcom Service(s). Otherwise, you will find the information about third parties in the respective consent. Data processing by third parties takes place in accordance with their data privacy information. The legal basis is Art. 6 para. 1 S. 1 lit. a) GDPR.

Deregistration of direct marketing

- ▶ Follow the instructions in the respective Marcom Service (you can find an email address there where you can unsubscribe).
- ▶ Use the unsubscribe link in our newsletters
- ▶ If you have a Tech Data customer account, change the settings for your account in the preference center

h. Internal evaluations

We use all the aforementioned data categories for our internal evaluations, including personal data, in order to draw conclusions on the utilization and success of a Marcom Service(s), to be able to optimize these and future Marcom Service(s) further, and to determine customer needs and market requirements.

We will compare your registration data with our database to find out if you or the company you are working for are already a Tech Data customer or have already taken part in (a) Marcom Service(s). For this purpose, we also access any data stored about you by us, as well as data about your usage behavior in relation to our websites (with your consent if this information is collected by cookies or similar technologies), and combine and analyze these in order to better understand your position and your preferences and to obtain an overview of what offers and opportunities could be of interest to you. This is done by evaluating data to identify patterns in usage and purchasing behavior. We also anonymize your data for statistical evaluations. The legal basis for this is Art. 6 para. 1 S. 1 lit. f) GDPR (for the balance of interests, our interest is the improvement of our Marcom Service(s), their functionalities and our associated services, as well as financed content and promotions).

3. How are cookies and similar technologies used?

Use of cookies

Tech Data uses cookies on its websites. Cookies are small text files required for the proper functioning of a website or used by websites to make the user experience more efficient. In accordance with statutory law, Tech Data may store cookies on your device if they are absolutely necessary for the operation of a Tech Data page. We require your permission for all other cookie categories. In addition, cookies can be either "permanent" cookies or "session cookies". A permanent cookie consists of a text file that is sent from a web server to a web browser. This is saved by the browser and remains valid until its set expiry date. Of course, the user can also delete it before the expiry date. On the other hand, a session cookie expires at the end of the user session when the web browser is closed.

Tech Data uses both absolutely necessary as well as statistical and marketing cookies on its websites. The necessary cookies cannot be disabled, because they are required for the proper functioning of the website and for compliance with legal regulations or for the security of our systems. The statistical cookies help us to understand how visitors interact with our websites by collecting and reporting information anonymously. The marketing cookies are used to better understand visitor behavior and to optimize our offers accordingly. The intention is to display only those ads that are also really relevant and appealing to the individual user. The statistics and marketing cookies are only set if you actively agree to their use.

You can change your cookie settings at any time in the footer of the respective Tech Data page under "Cookie Settings".

For the purpose of optimizing our marketing activities, applications from third parties are also used on our websites with your corresponding consent. These are explained in more detail below.

Google Analytics

If you have given your consent, Google Analytics is used on this website, a web analysis service of Google Ireland Limited ("Google"). The usage includes the Universal Analytics operating mode. This makes it possible to assign data, sessions and interactions across several devices to a pseudonymous user ID and thus analyze the activities of a user across the various devices.

Google Analytics uses "Cookies", text files that are stored on your computer and enable an analysis of your use of the website. The information generated by the cookie about your use of this website is generally transmitted to a Google server in the USA and stored there. However, if IP anonymization is activated on this website, your IP address will first be shortened by Google within member states of the European Union or in other contracting states of the Agreement on the European Economic Area. We would like to point out that on this website, Google Analytics has been expanded by an IP anonymization to include an anonymized collection of IP addresses (called IP masking). The IP address transmitted by your browser within the framework of Google Analytics is not merged with other Google data. You can find more detailed information on the terms of use and data privacy at <https://www.google.com/analytics/terms/de.html> or at <https://policies.google.com/?hl=de>.

Purposes of processing

On behalf of the operator of this website, Google will use this information to evaluate your use of the website, to compile reports on website activities, and to provide other services related to website use and internet use to the website operator.

Legal basis

The legal basis for the use of Google Analytics is your consent pursuant to Art. 6 para. 1 S. 1 lit. a GDPR.

Recipients/categories of recipients

The recipient of the collected data is Google.

Duration of data storage

The data sent by us and linked with cookies, user credentials (e.g. user ID) or advertising IDs are automatically deleted after

14 months. Data whose retention period has been reached is deleted automatically once a month.

Rights of data subjects

You can revoke your consent at any time with future effect by preventing the storage of cookies by adjusting the settings of your browser software accordingly; however, we would like to point out that in this case, you may not be able to use all functions of this website in full.

You can also prevent the collection of data generated by the cookie and related to your use of the website (including your IP address) by Google and the processing of this data by Google by downloading and installing the browser add-on. Opt-out cookies prevent the future collection of your data when you visit this website. To prevent the collection by Universal Analytics across different devices, you must perform the opt-out on all systems used. When you click here, the opt-out cookie is set: [Disable Google Analytics](#).

Google Ads

Google Ads is a service of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. With the help of this service, Google and we can recognize that an ad placed by Google was clicked, and that it redirected to a page. When you click on the display shown, a cookie for conversion tracking is stored on the respective device.

These cookies are only valid to a limited extent, do not contain any personal data and are therefore not used for personal identification. In this context, Google only creates anonymized user profiles to be able to display personalized advertising. Each Google Ads customer receives a different cookie. It is thus excluded that cookies can be tracked via the websites of Ads customers. The information obtained with the help of the conversion cookie is used to create conversion statistics. We find out the total number of users who have clicked on one of our ads and have been redirected to a page marked with a conversion tracking tag. However, we do not receive any information with which we can personally identify users.

You have the option of either changing your cookie settings in the footer of our websites or deactivating cookies directly from the provider at the following URL:

<https://adssettings.google.com/authenticated>.

Google Tag Manager

Google Tag Manager is a service of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. We use Google Tag Manager to manage various web page tags through a browser user interface. Google Tag Manager is a cookieless domain and does not collect any personal data itself. It only triggers other tags that may collect data. Google Tag Manager does not access these data. No personal data are stored.

LinkedIn Analytics & LinkedIn Insight Tag

We use the conversion tracking technology and the retargeting function of LinkedIn Corporation on our website. LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland.

Using this technology, visitors to this website can display personalized ads on LinkedIn. It also provides the opportunity to create anonymous reports on the performance of the advertisements, as well as information on interaction with the

site. For this purpose, the LinkedIn Insight Tag is integrated on our websites, whereby a connection to the LinkedIn server is established, provided that you visit the respective website and are logged into your LinkedIn account at the same time.

These data are transmitted to LinkedIn, encrypted; the IP addresses are shortened, and the direct IDs of the LinkedIn members are removed within seven days to pseudonymize the data. These remaining pseudonymized data are deleted by LinkedIn within 90 days. LinkedIn does not share any personal data with us, but only provides summarized reports about the website target group and the performance of the ad.

You can find further information on data collection and data use, as well as the options and rights to protect your privacy, in the LinkedIn Privacy Policy:

<https://www.linkedin.com/legal/privacy-policy>.

You have the option of changing your cookie settings either in the footer of our websites or deactivating the data collection directly at LinkedIn at the following URL:

<https://www.linkedin.com/psettings/enhanced-advertising>.

Twitter Ads

We use the so-called "Twitter Pixel" on our websites, a service of Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA (hereinafter referred to as "Twitter").

With the help of the Twitter Pixel, we can track actions of users after they have seen or clicked on a Twitter advertisement in particular. This method is used to evaluate the effectiveness of Twitter ads for statistical purposes and for market research purposes and can help us to optimize future advertising measures.

Statistical, pseudonymous data are transmitted to Twitter to provide us with appropriate statistics on this basis and to be able to display interest-specific offers to you. These data are stored in a cookie. The data collected are anonymous to us, i.e. no conclusions can be drawn about the identity of the users. However, the data are stored and processed by Twitter so that a connection to the respective user profile is possible, and Twitter can use the data for its own advertising purposes in accordance with the Twitter Privacy Policy: <https://twitter.com/privacy>. We have no influence on the scope and further use of data that is collected through the use of Twitter Pixel by Twitter.

You can either deactivate the aforementioned recording by Twitter Pixel in the footer of our websites under "Cookie settings" or generally deactivate the use of your data to display Twitter ads directly on Twitter:

<https://twitter.com/settings/account/personalization>.

Outbrain Ads

We use the conversion tracking of Outbrain, a service of Outbrain UK Limited, 5 New Bridge Street, London, EC4V 6JAU (hereinafter "Outbrain") on our websites.

With the help of an "Outbrain Pixel", we can track activities of users who have interacted with an Outbrain advertisement. This serves to record the effectiveness of the Outbrain Ads, to evaluate them for marketing purposes and to optimize them in the future. The advertisements delivered by Outbrain are automatically adapted to the interests of the respective user based on the contents consumed so far and are accordingly "personalized".

For this purpose, Outbrain assigns a Universally Unique Identifier (UUID), which can identify users on an end device basis if they

visit a website on which the Outbrain widget is implemented. Information on the device source, browser type and an IP address completely anonymized by removing the last octet are also recorded here. The data collected are anonymous and do not allow any conclusions to be drawn about the identity of the user.

You have the option of changing your cookie settings either in the footer of our websites or deactivating the data collection directly at Outbrain at the following URL:

<https://my.outbrain.com/recommendations-settings/profile>

Social Media Function

Tech Data provides social media functions that allow you to share your information with your social networks and interact with Tech Data on a variety of social media sites. The use of these functions may result in information about you being collected or shared, depending on the function.

We recommend that you review the privacy statements and settings on the social media sites that you use to interact with us to ensure that you understand what information may be collected, used and shared by the sites. You can deactivate these functions at any time.

4. What data do you need to provide?

For successful registration and the conclusion of the participation contract, it is necessary that you provide the mandatory information, otherwise unfortunately no registration can take place. If you participate in an online seminar or another virtual event, you may need to enter your email address to be admitted; otherwise, you cannot participate.

Otherwise, there is no legal or contractual obligation to provide the service.

5. Who receives your data?

a. Internal data recipients.

Internally, those departments that handle the registrations and Marcom Service(s) technically and/or organizationally, as well as the company for which you work, have access to your data.

b. External recipients.

Supplier. In the case of supplier-financed Marcom Service(s), the suppliers have an interest in tracking the success of Marcom Service(s) and of content provided, including for the respective control of success and costs, as well as for anti-fraud and anti-corruption prevention.

For this purpose, we generally only transmit anonymized data and statistics about the type, number and scope of the retrievals of their contents to the suppliers.

Insofar as required for the above purposes for the supplier, we may also transmit the company, company address and your job position, if necessary your last name and first name and business email/telephone number to the suppliers in addition to this data if these data are required in the context of balancing interests. If you would like to be informed about which data has been transferred to suppliers, you can request this at any time by sending an e-mail to marcom-services@techdata.com and specifying the Marcom Service in question.

The legal basis for the transmission is Art. 6 para. 1 S. 1 lit. f) GDPR (for the balancing of interests, the interest of the respective supplier is the implementation of success and cost control with regard to the contents and promotions financed by it for Marcom Service(s) and for anti-fraud and anti-corruption prevention; our interest is to enable the supplier to do so, to be able to present content from this in the future, and to support our partners in complying with their legal obligations).

Third parties for marketing purposes. See above: Advertising use of your data.

Tech Data companies. If a Marcom Service(s) is also directed at participants and in particular business partners of other Tech Data companies, we transmit your data to the Tech Data companies named in the registration so that they can process the data for the above purposes: Retrieved data, participation in surveys, participation in competitions and similar promotions, internal evaluations, billings and advertising use (subject to compatibility with national guidelines on direct marketing).

The legal basis for the transmission is Art. 6 para. 1 S. 1 lit. f) GDPR (for the balance of interests, our interest and the interest of the receiving company for the development of existing and future customer relationships. The special legal basis for the transmission of personal data to Tech Data (Switzerland) GmbH, to the extent relevant, is Art. 45 para. 1 GDPR (Switzerland is recognized by the EU under data privacy law as a secure third country).

Technical service providers. To ensure the technical requirements of our Marcom Service(s) and functions, we use external technical service providers that we have carefully selected, including other Tech Data companies. Since they may sometimes receive access to or process your personal data within the scope of their service provision, we have commissioned them within the framework of order processing (Art. 28 GDPR). They are strictly bound by our instructions and are monitored by us in accordance with the legal requirements. Use of US communication and videoconferencing providers such as Zoom, MS teams, etc. See also above under the function for content retrieval/attendance of virtual Marcom Service(s).

Other external data recipients within the framework of contests and similar promotions in particular are third parties who require the data to provide you with services under Marcom Service(s), e.g. hotels or travel agencies, organizers or suppliers.

International data transfer

It may be that a data recipient has its registered office in a country outside the EU/EEA for which there is no adequacy decision of the EU Commission on the level of data privacy there, such as the USA ("third country"). In this case, the level of data privacy there does not correspond to the level of the EU. We limit the transmission of personal data to the minimum that is necessary for the fulfillment of the contract and the provision of Marcom Service(s) and functions. In such cases, we have provided suitable safeguards for the protection of your transmitted data by concluding a data privacy contract (EU standard data privacy clauses) with the respective third party specified by the EU Commission.

The legal basis for the transfer of data to such a third country is Art. 49 para. 1 (b) GDPR (data transfer is necessary for the implementation of the participation contract with you, e.g. for the holding of a Zoom online seminar), Art. 49 para. 1 (a) GDPR if we obtain your explicit consent to the data transfer, and otherwise Art. 46 para. 2 lit. c) GDPR in conjunction with the EU data privacy standard clauses referred to above.

6. How long do we store your data?

We store your data for as long as it is necessary for the implementation of the respective Marcom Service and for as long as it is legally required for Tech Data (usually 10 years or the time required to enforce or defend legal claims.) Optional information such as data we have collected as part of the feedback process will be deleted within three months after the end of the Marcom Service. We store your data for direct marketing until we have received the withdrawal of your consent.

7. What data privacy rights do you have?

You have the following rights if the respective legal requirements are met:

Information about our processing of your personal data according to Art. 15 GDPR
Correction and/or completion of data concerning you (Art. 16 GDPR).

Deletion Personal data relating to you are deleted immediately if one of the reasons listed in Art. 17 GDPR applies in detail, e.g. if the data are no longer needed for the purposes pursued (right to deletion).

Restriction of processing if one of the conditions listed in Art. 18 GDPR is met.

Right of objection for reasons arising from your particular situation to object to the processing of personal data concerning you at any time, which is carried out on the basis of Art. 6 para. 1 e) or f) GDPR or for purposes of direct advertising (Art. 21 GDPR); see in detail below.

Data portability. You have the right to receive the data concerning you that you have provided to us from us in a structured, accessible and machine-readable format. You can also transfer these data to other locations or have it transmitted by us.

Withdrawal of consent. If we process your personal data on the basis of consent, you can revoke this with effect for the future from Tech Data at any time, i.e. by email to the email address specified in the consent form. The validity of the data processing on the basis of the consent until the time of revocation remains unaffected.

Complaint. You also have the right to lodge a complaint with a data privacy supervisory authority if you believe that the processing of your personal data violates the GDPR (Art. 77 GDPR).

Note on the right of objection under data privacy law:

You have the right of objection for reasons arising from your particular situation to object to the processing of personal data concerning you at any time, which is carried out on the basis of Art. 6 para. 1 S. 1 lit. f) GDPR (balancing of interests) or for purposes of direct advertising (Art. 21 GDPR); see in detail below. You can find out which data processing we rely on to balance interests in the above data privacy information.

We will no longer process the personal data after receipt of your objection, unless we can prove compelling legitimate reasons for the processing that outweigh your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

8. Data Protection Officer of Tech Data GmbH & Co. OHG (if responsible body of Marcom Services):

Dr. Selk - DSB_TechData@dsb-consulting.com