
Sarooma GmbH

**Data protection declaration for the use
of the website**

Document version September 2023

Sarooma

Sarooma GmbH | Bauseweinallee 68d | 81247 München

Telephone +49 (0) 89 244 187 060 | info@sarooma.de

1. Basic information

This data protection declaration is intended to inform about the nature, scope and purpose of the collection and use of personal data by the Sarooma GmbH in relation to the homepage.

Sarooma GmbH takes the protection of personal data very seriously and treats it confidentially and in accordance with the statutory provisions. As new technologies and the constant development of procedures and methods of data processing may result in changes to this data protection declaration, we recommend that you read it again at regular intervals.

Definitions of the terms used (e.g., "personal data" or "processing") can be found in Art. 4 GDPR.

2. How to contact us

Sarooma GmbH is responsible for the collection and processing of your personal data and thus also for compliance with data protection regulations. Our contact details are as follows:

Responsible person in the sense of the GDPR

Dipl.-Inf. (FH) Florian Fordermaier (Managing Director)

Dipl.-Math (FH) Michael Gillé (Managing Director)

Dipl.-Ing. (FH) Jochen Schaal (Managing Director)

Sarooma GmbH

Bauseweinallee 68d

81247 München

Telephone: +49 (0) 89 244 187 060

E-Mail: info@sarooma.de

3. Type of data collected/purpose of data collection

Access data

Data about accesses to the website are not logged.

Contact form

Requests can be sent to us via the contact form. The following data can be entered via the form: Name, e-mail, subject, message. These data are transmitted to our administration. There it will be decided who will process the request and it will be forwarded including contact data to the respective internal employee. The data will not be forwarded to third parties outside the company.

Use of Cookies

Our website does not use so-called cookies. These are small text files that are stored on your terminal device with the help of the browser. They do not cause any damage. The location of the cookies is determined by the user's browser settings.

External Links

Our offer contains links to external websites of third parties, on whose contents we have no influence. Therefore, we cannot assume any liability for them. The respective provider or operator of the pages is always responsible for the content of the linked pages. The linked pages were checked for possible legal violations at the time of linking. Illegal contents were not recognizable at the time of linking. However, a permanent control of the contents of the linked pages is not reasonable without concrete evidence of a violation of the law. If we become aware of any infringements, we will remove such links immediately.

Web analysis using MATOMO Analytics

Web analysis using MATOMO Analytics

On this website, data is collected and stored using the web analytics software Matomo (www.matomo.org), a service of the provider InnoCraft Ltd, 150 Willis St, 6011 Wellington, New Zealand, ("Matomo") based on our legitimate interest in the statistical analysis of user behaviour for optimization and marketing purposes pursuant to Art. 6 (1) lit. f GDPR. Pseudonymized user profiles can be created and evaluated from this data for the same purpose.

The evaluation takes place exclusively without the use of cookies.

The data collection is anonymous. You also have the option of preventing actions you take from being analysed and linked. This is done via an opt-out and can be activated or deactivated on the homepage under data protection (<https://sarooma.com/en/privacy/>).

4. Legal basis

For access data and contact form, the lawfulness of the collection of personal data results **from Article 6 of the GDPR paragraph 1 lit. a**

"... the data subject has given consent to the processing of personal data concerning him or her for one or more specific purposes."

For MATOMO Analytics, the lawfulness derives **from Article 6 of the GDPR paragraph 1 lit. f** to protect the legitimate interests of the controller.

5. Legitimate interests of the responsible party

In the case of MATOMO Analytics, this is done based on a legitimate interest.

The web analysis serves to optimize our website and to learn more about which topics and content are of interest to visitors. By anonymizing the IP address, we ensure that it is not possible to draw conclusions about individual visitors within the scope of the analyses. The visitor of the website can deactivate the web analysis by taking the measures mentioned under point 3.

6. Internal and external disclosure of your personal data

An internal transfer of your personal data will only take place within the framework of the purposes defined under point 3 of this data protection declaration in accordance with the principle of data economy and other principles of data protection.

External disclosure of your personal data may take place under the following circumstances.

- Assignment of support services for which access to your personal data is necessary or at least cannot be completely ruled out. This includes, for example, IT support services.
- Your personal data will only be passed on to other network partners with your consent.

7. Transfer of your data to a third country (outside the European Union) or an international organization

Wir übermitteln Ihre personenbezogenen Daten nicht an ein EU-Drittland oder an eine international tätige Organisation. Sollte dies notwendig sein, würden wir Sie hierrüber im Vorfeld informieren und alle notwendigen Maßnahmen zur Einhaltung eines angemessenen Datenschutzniveaus sicherstellen.

8. Storage period and deletion of your personal data

The legislator has enacted many retention periods, which we observe with the utmost care and seek advice in order to comply with these obligations. Generally, we will only store your personal data for as long as permitted by the defined purposes or as required by law for reasons of proof. Should we wish to store your data for longer than previously described, we would ask you to confirm this as part of a voluntary declaration of consent.

9. Your rights

You are generally entitled to the following rights regarding your personal data:

Right of information (Art. 15 GDPR)

You have the right to request confirmation from us as to whether personal data concerning you are being processed. If this is the case, you have the right to information about this personal data and the following information:

- the purposes of processing.
- the categories of personal data that are processed.
- the recipients or categories of recipients to whom your personal data have been or will be disclosed, in particular in the case of recipients in third EU countries or international organizations.
- if possible, the planned duration for which your personal data will be stored or, if this is not possible, the criteria for determining this duration.
- the existence of a right to rectification or erasure of personal data concerning you or to restriction of processing by us or a right to object to such processing.
- the existence of a right of appeal to a supervisory authority.

- if the personal data are not collected from the data subject, any available information on the origin of the data.
- in the event of automated decision-making, including profiling (meaningful information about the logic involved and the scope and intended effects of such processing for your person).

If your personal data is transferred to a third country or to an international organization, you have the right to be informed about the appropriate "safeguards" in relation to ensuring an adequate level of data protection in connection with the transfer.

We will provide you with one free copy of the personal data that is the subject of the processing. For any additional copies you request, we may charge a reasonable fee based on administrative costs. If you make the request electronically, you will be provided with the information in a commonly used electronic format unless you specify otherwise.

Right of rectification (Art. 16 GDPR)

In case of inaccurate personal data, you have the right to rectification without delay. Considering the purposes of the processing, you have the right to request the completion of incomplete personal data - also by means of a supplementary declaration.

Right to deletion (Art. 17 GDPR)

You have the right to have your personal data stored by us deleted, insofar as certain criteria are met. These are for example:

- The personal data is no longer required for the fulfilment of the agreed purpose.
- You withdraw a voluntary declaration of consent that you have given.
- Your personal data have been processed unlawfully so far.
- There is a legal obligation to delete.

Details on criteria and restrictions can be found in GDPR Art. 17.

Right to restriction of processing (Art. 18 GDPR)

You have the right to restrict the processing of your personal data stored by us, insofar as certain criteria are met. These are for example:

- The accuracy of the personal data is disputed by you for a period that allows us to verify the accuracy of the personal data.

- The processing is unlawful, and you refuse the erasure of your personal data and instead request the restriction of the use of your personal data.
- If we no longer need your personal data for the purposes of processing, but you need it for the assertion, exercise, or defence of legal claims.
- If you have objected to processing until it has been determined whether our legitimate grounds override yours.

Details and further regulations on this can be found in GDPR Art. 18.

Right to data transferability (Art. 20 GDPR)

You have the right to receive the personal data we have stored about you, insofar as this is processed in an automated procedure, in a structured, common, and machine-readable format.

You also have the right to transfer this data to another controller without hindrance from us to whom the personal data has been provided.

When exercising your right to data portability, you have the right to obtain that your personal data be transferred directly from us to another controller, where this is technically feasible.

The right to data portability may be restricted insofar as the rights or freedoms of other persons are affected by the exercise of this right.

Right of withdrawal and objection with regard to processing

If we process personal data about you based on a declaration of consent, you have the right to revoke the consent given. However, the lawfulness of the processing carried out based on the consent up to the revocation remains unaffected by this. Regarding compliance with storage periods, point 8 of this data protection declaration must also be observed in this respect.

Right of complaint to the supervisory authorities

If you believe that the processing of your data violates data protection law or your data protection rights have been violated in any other way, you are free to complain to the supervisory authority.

The supervisory authority responsible for us:

State Commissioner for Data Protection and Freedom of Information Bavaria

<https://www.datenschutz-bayern.de/>

10. Obligatory submission of your personal data and possible consequences in case of refusal to submit the data

In order to maintain the functionality and continuous improvement of our Internet offer, we require the data mentioned under point no. 3 of this data protection declaration. Without this data collection, a correct use of our internet offer is not possible.

11. Automated decision-making and profiling

There is no automated decision making in relation to your person. No "profiling" is carried out using the personal data collected from you.

12. Change of purpose

If we intend to change the purpose for which your personal data was originally collected, we will inform you of this in advance in a detailed and transparent manner. In this case, we will of course provide you with all the information required by law. If the change of purpose involves the processing of personal data on the legal basis of a voluntary declaration of consent, we will inform you accordingly and ask for your formal consent.

13. Open questions, complaints, or suggestions

You are welcome to contact us with any questions, complaints, or suggestions regarding data protection. If necessary, you are welcome to contact our data protection officer (see point no.2 of this data protection declaration) for this purpose.

As of: September 22, 2023