protiviti®
Face the Future with Confidence

Privacy Notice

This Privacy Policy provides information on how Protiviti GmbH (hereinafter also referred to as "Protiviti" or "we"/"us") processes personal data. This applies to all interactions with us, including the use of the website and participation in webinars. It also informs you how your data is protected and what rights you have under the GDPR. Details of the data collected and how it is used can be found in the section "Processing your personal data".

The applicant and employee privacy notice can be found here.

Our services, including our website, are not aimed at children.

Date: January 8th, 2025

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I. Controller and external data protection officer

Controller
Protiviti GmbH
Mainzer Landstraße 50
60325 Frankfurt am Main
privacy-emea@protiviti.com

Data Protection Officer
Attorney-at law Olga Stepanova
C/O bytelaw Koch Stepanova Veeck
Partnerschaft von Rechtsanwälten mbB
Bockenheimer Landstraße 51-53
60325 Frankfurt am Main
stepanova@byte.law

II. Processing your personal data

1. Website visitors

The following section explains how we process your personal data when you use our website and its functions in general. Please also note the special information for candidates, applicants, customer contacts, supplier/service provider contacts and on-site visitors.

a. Use of our website for informational purposes

When you use our website for informational purposes, the browser used on your device sends information for technical reasons.

Processed data categories: technical data (IP address, device type and model, operating system, browser type and version, time zone and language setting, access date and time and the referrer URL - the website from which you came)

Purposes of processing: We process the aforementioned categories of data in order to provide you with the content of the websites you access and to ensure the security of our IT systems. We do not use this data for any other purpose, in particular for advertising purposes.

Source of data: This data is collected directly from you

Obligation to provide the data: There is neither a statutory nor a contractual obligation to provide this data. However, if this data is not provided, the website cannot be displayed and used in its full functionality.

Legal basis: The processing is based on the so-called legitimate interest according to Art. 6 par. 1 lit f. GDPR. Our legitimate interest in the processing is the provision of the website and ensuring the security of the IT systems used for this provision.

Retention period: The data is only stored temporarily for the duration of the session. They are deleted after the end of the respective session.

Category of recipients: None

Location of recipients: -

Safeguards for data transfer to third countries: -

b. Receiving marketing communication

You have the option of registering on our website via the contact form to receive marketing communications. Upon registration you will receive marketing information from us.

Processed data categories: Master data (first name, surname), contact data (telephone number, e-mail address), professional data (job title), geographical data (country) and technical data (IP address, date and time of your registration)

Purposes of processing: Personalization of marketing information by name, geography and profession. We process your IP address and the time of registration to ensure that you have registered, to prevent identity fraud and to prove that you have given your consent.

Source of data: This data is collected directly from you via the registration form provided and via the technical data transmitted by your browser.

Obligation to provide the data: There is neither a statutory nor a contractual obligation to provide this data. However, marketing communications cannot be sent and received if the data is not provided.

Legal basis: The processing takes place on the basis of the consent obtained from you by means of the so-called double opt-in procedure in accordance with Art. 6 par. 1 lit a. GDPR. The double opt-in procedure is used to register and authenticate your email address. Based on this procedure, the IP addresses are compared by your website visit and the confirmation of your e-mail address by a confirmation link.

Retention period: We store your data until you unsubscribe from our newsletter. You can easily unsubscribe by clicking on the unsubscribe link contained in every newsletter. If we have also received and processed your name and e-mail address for purposes other than sending the newsletter, your data will only be deleted at your express request or if all purposes of processing have already been achieved and your data is no longer subject to any statutory retention obligations. If you wish to unsubscribe, you will no longer receive newsletters; your data will continue to be stored for other purposes.

Category of recipients: Software providers, cloud storage providers

Location of recipients: EU and Non-EU

Safeguards for data transfer to third countries: EU standard contractual clauses (SCC)

Withdrawing consent: You can withdraw your consent to the processing of the personal data you provided when contacting us at any time with effect for the future in accordance with Art. 7 par. 3 GDPR. To do so, please contact privacy-emea@protiviti.com. The legality of the processing carried out up to that point on the basis of the consent remains unaffected by the withdrawal.

c. Feedback

You can give us suggestions and feedback on our services, our website or its content on a voluntary basis via e-mail to contact@protiviti.de.

Processed data categories: Contact data (e-mail address), communication data (content of your message), other information that you provide to us voluntarily

Purposes of processing: Processing your feedback

Source of the data: We collect this data directly from you

Obligation to provide the data: There is neither a statutory nor a contractual obligation to provide this data. However, if you do not provide this data, we will not be able to receive your feedback.

Legal basis: We process this data on the basis of our legitimate interest pursuant to Art. 6 para. 1 lit f. GDPR. Our legitimate interests are receiving your feedback and optimizing our services, website and its content.

Retention period: -

Category of recipients: Software providers, cloud service providers, Protiviti employees

Location of recipients: EU and Non-EU

Safeguards for data transfer to third countries: EU standard contractual clauses (SCC)

d. Contacting us

You have the option of contacting us by telephone or via the inquiry form on our website.

Processed data categories: Master data (Your full name); contact data (Your phone number or e-mail address, depending on your mean of contact; company name), communication data (Content of your message), professional data (Job title- and level), geographic data (Your country)

Purposes of data processing: Receiving and answering your inquiry

Sources of data: We collect this data directly from you via your chosen mean

of contact

Obligation to provide data: There is neither a legal nor a contractual obligation to provide this data. However, if you do not provide this data, we will not be able to receive your feedback.

Legal basis: We process this data on the basis of our legitimate interest in accordance with Art. 6 para. 1 lit f. GDPR. Our legitimate interest lies in receiving your feedback and optimizing our services, website and its content.

Retention period: We retain your data for the duration of the processing of your feedback.

Recipient category: Software providers, cloud storage providers, Protiviti employees

Location of recipients: EU and non-EU

Safeguards for data transfer to third countries: Standard Contractual Clauses (SCC) of the EU

e. Whistleblowing system

We have established an appropriate compliance concept to ensure adherence to legal requirements. In addition to guidelines, the monitoring of existing and new processes and other prevention and response measures, this also includes the complete investigation of suspected breaches of regulations. The clarification measures also include the establishment of a whistleblower system, which employees and external parties can use to report suspected violations to us. Further general information on our whistleblower system can be found (here).

Processed data categories:

Whistleblower: master data (first name, surname); contact data (email address, telephone number, postal address - if provided voluntarily); communication data (content of the report)

Accused person (if necessary to investigate the suspected violation and/or provided by the whistleblower): Master data (first name, surname,
professional data (position, title); company contact data (e-mail address, telephone number, postal address); factual data (information on the facts as provided by the whistleblower); communication data (e-mail content of accused employees); other company documents from or about accused employees; special categories of personal data within the meaning of Article 9 GDPR (if provided by the whistleblower)

Purpose of processing: Plausibility check of the information, clarification of possible violations, implementation of any necessary measures in the event of identified violations, preventive measures against future misconduct, assertion and/or defense against asserted legal claims, exoneration of accused persons,

fulfillment of any obligations to cooperate in investigations by law enforcement and/or other authorities involved within the legally permissible framework.

Source of the data: This data is collected directly from you, provided by the whistleblower or, if necessary for the investigation, is also collected from superiors, colleagues or third parties.

Obligation to provide the data: The whistleblower is under no legal or contractual obligation to report a suspected violation via the whistleblower system. If the facts of the case are investigated, the accused party may have a legal and/or contractual obligation to provide personal data. In this case, we will inform you accordingly upon request.

Legal basis: The processing is carried out to fulfill legal obligations, Art. 6 para. 1 lit c. GDPR in conjunction with Sections 13, 14 of the Whistleblower Protection Act. If you voluntarily provide us with your personal data in the whistleblower form, you give us your consent in accordance with Art. 6 para. 1 lit a. GDPR for the processing of this data. Furthermore, the processing is based on our legitimate interest pursuant to Art. 6 para. 1 lit f. GDPR. The legitimate interests are the defense against legal claims, the support of the accused in the event of exoneration and the anonymization of data to improve preventive measures.

Retention period: We retain the personal data involved for as long as this is necessary for the investigation and to take appropriate measures and beyond that until the expiry of statutory retention periods. The whistleblower's identification and contact data will be deleted immediately if consent is withdrawn. We reserve the right to store certain information beyond this period if this serves to improve preventive measures. In this case, we will anonymize the information in advance to such an extent that it is no longer possible to draw conclusions about the persons involved.

Recipient category: Software provider, cloud storage provider

Location of recipients: EU and non-EU

Safeguards for data transfer to third countries: Standard Contractual Clauses (SCC) of the EU

f. Registration for Protiviti Webinars

You can register for Protiviti webinars via our website.

Processed data categories: Master data (surname, first name); communication data (business email address); professional data (your company, your industry, your job title); geographical data (your country, your region if applicable), content of the questions you ask us during the webinar or in advance if applicable, your marketing preference, registration data (time and date).

Purposes of data processing: Registration for our webinars

Source of the data: We collect this data directly from you.

Obligation to provide the data: There is neither a legal nor a contractual obligation to provide this data. However, it is not possible to register for our webinars without providing this data.

Legal basis: We process your master and communication data for the execution of a contractual relationship in accordance with Art. 6 para. 1 lit b. GDPR. We process your professional and geographical data, as well as the content of your questions, on the basis of our legitimate interest pursuant to Art. 6 para. 1 lit. f. GDPR. Our legitimate interest lies in the optimization of our webinars.

Retention period: We retain your data until the end of the standard limitation period under civil law (3 years).

Recipient category: Software provider, cloud storage provider

Location of recipients: EU and non-EU

Safeguards for data transfer to third countries: Standard Contractual Clauses (SCC) of the EU

g. Consent-Management

We use a consent management service for cookie management on our website.

Processed data categories: Date and time of the visit, browser information, information on consent, information on the end device, IP address of the requesting end device.

Purpose of processing: The purpose of data processing is to offer visitors to our website the opportunity to consent to the use of cookies. The documentation of such consent is required in accordance with the accountability obligation under Art. 5 para. 2 GDPR and is necessary to ensure the revocation of consent and to control the setting of cookies.

Source of the data: This data is collected directly from you.

Obligation to provide the data: There is neither a legal nor a contractual obligation to provide this data.

Legal basis: The processing of the above data is based on a legal obligation under Art. 6 para. 1 sentence 1 lit. c GDPR i.V.m. Section 25 para. 1 of the Telecommunications Digital Services Data Protection Act.

Retention period: We delete your personal data when it is no longer required to achieve the purpose for which it was processed. This is usually the case after three years, starting at the end of the year in which the data was collected.

Recipient category: Software provider

Location of the recipients: EU

Safeguards for data transfer to third countries: Standard Contractual Clauses (SCC) of the EU

h. Use of web analytics tools

We use web analytics tools to gain insights into the use of our website so that we can measure and improve the performance, content or functionality of our website. As data protection is important to us and to improve the protection of your personal data, we also use data protection technologies. By using these, we prevent the third-party providers used from drawing conclusions about visitors to our website. As part of the web analysis services, we rely on server-side tracking, which means that the tracking is outsourced to our servers. This improves the protection of your privacy and allows us to carry out analyses without identifying you through this data.

We use server-side tracking provided by Tealium Inc (9605 Scranton Rd., Ste. 600, San Diego, CA 92121), a service provider based in the USA. The cookie used is called "TAPID" and can be rejected at any time via our cookie settings, which you can access at any time by clicking on the green symbol displayed at the bottom left. However, the data processing takes place exclusively in Germany. Tealium does not store the analysis data it processes. After transmitting the anonymized data to the analysis service provider, Google Inc. 1600 Amphitheatre Pkwy, Mountain View, CA 94043, United States, Tealium Inc. deletes the processed data. This service uses server-side tracking with first-party cookies, and the anonymized analysis data is transmitted to Google without visitors being able to be identified.

These cookies are only used if you have previously given your consent to their use. Further information on the use of cookies can be found in the corresponding section below.

Processed data categories: Technical data (IP address, device type and model, operating system, browser type and version, time zone and language setting; access date and time and the referrer URL - website from which you came)

Purpose of processing: Measuring the interaction with our website and the success of our online offering and improving our web offering

Source of the data: This data is collected directly from you through the use of cookies.

Obligation to provide the data: There is neither a legal nor a contractual obligation to provide this data.

Legal basis: The processing is based on your consent pursuant to Art. 6 para. 1 lit a. GDPR and Section 25 para. 1 of the Telecommunications Digital Services Data Protection Act.

Storage period: We delete your personal data when it is no longer required to achieve the purpose for which it was processed. This is usually the case after three years, starting at the end of the year in which the data was collected.

Recipient category: Software provider

Location of the recipients: EU

Safeguards for data transfer to third countries: -

Withdrawing consent: In accordance with Art. 7 para. 3 GDPR, you have the right to revoke your consent at any time and without giving reasons with effect for the future. To do so, please use our Consent Management menu on our website.

2. Client contacts

a. Consultation request

You have the option of contacting us by telephone or using the inquiry form on our website. You are of course free to choose how to contact us.

Processed data categories: Master data (first name, surname); contact data (telephone number and/or e-mail address, depending on the form of contact, company name); communication data (your request, content of your message); professional data (job level and title); geographical data (country)

Purposes of data processing: Receiving and responding to your contact.

Source of the data: We collect this data directly from you via the contact medium you have selected.

Obligation to provide the data: There is neither a legal nor a contractual obligation to provide this data. However, if you do not provide this data, we will not be able to process your contact request.

Legal basis: If pre-contractual measures are initiated by the message or contact is made as part of an existing contractual relationship, the data in question is processed in accordance with Art. 6 I lit b. GDPR. In all other cases, the processing is carried out on the basis of a legitimate interest in accordance with Art. 6 I lit. f. GDPR. Our legitimate interest in processing is receiving and responding to your contact.

Retention period: If no further cooperation results from the establishment of contact, we will only retain your data until your inquiry has been answered or the correspondence with you has been concluded; if further cooperation results from the initial contact, the corresponding storage periods of the listed processing operations apply. As a rule, your data will be deleted after expiry of the limitation period. The standard limitation period for civil law claims is three years, beginning at the end of the year in which the contractual relationship

was terminated.

Recipient category: Software providers, cloud storage providers, Protiviti employees

Location of recipients: EU and non-EU

Safeguards for data transfer to third countries: Standard Contractual Clauses (SCC) of the EU

b. Provision of services

In the context of our business activities, the term "provision of services" refers to all measures that are necessary to fulfill the obligations arising from a contract with you, as well as statutory accounting obligations.

Processed data categories: Master data (surname, first name); contact data (business e-mail address, business telephone number); professional data (job title, position, level); payment data, marketing preference; other data depending on the consulting service

Purposes of data processing: Provision of consulting services, fulfillment of legal obligations in connection with our services

Source of the data: We generally collect this data directly from you. However, your personal data may also be provided to us by your organization.

Obligation to provide the data: There is no legal or contractual obligation to provide the data. However, we cannot conclude a contract with you or your organization without the provision of data.

We process your data in order to fulfill the contract with you or your organization, Art. 6 para. 1 lit b. GDPR. Furthermore, we process your data based on our legitimate interest pursuant to Art. 6 para. 1 lit f. GDPR. Our legitimate interest lies in the growth of our company, in the development and improvement of our business strategy, in the effective provision of services and in maintaining the effective and lawful operation of our company. Insofar as we are legally obliged to process data due to accounting obligations, we process your data to fulfill a legal obligation pursuant to Art. 6 para. 1 lit c. GDPR in conjunction with Sections 238 of the German Commercial Code and 140 of the German Fiscal Code.

Retention period: We generally store your data until the end of the standard limitation period under civil law (3 years), unless we are legally obliged to store it for longer.

Recipient category: Protiviti employees, software providers, cloud storage providers

Location of recipients: EU and non-EU

Safeguards for data transfer to third countries: Standard Contractual

Clauses (SCC) of the EU

c. Assertion of and/or defense against legal claims

If necessary, we also process your personal data to assert and/or defend against legal claims.

Processed data categories: All relevant personal data stored by us about you that is necessary for the assertion and/or defense against legal claims and may be processed for this purpose within the framework of legal requirements, i.e. is not subject to any prohibitions on processing.

Purpose of processing: Assertion and/or defense against legal claims.

Source of the data: We collect this data directly from you

Obligation to provide the data: There is neither a legal nor a contractual obligation to provide this data.

Legal basis: We process this data based on our legitimate interest pursuant to Art. 6 para. 1 lit. f. GDPR. Our legitimate interest is the assertion of and/or defense against legal claims.

Storage period: We store this data for as long as it is necessary for the assertion and/or defense against legal claims. As a rule, this is the case until the end of the three-year limitation period, starting at the end of the year in which the contractual relationship was terminated.

Recipient category: Software providers, cloud storage providers, law firms, authorities, courts

Location of recipients: EU and non-EU

Safeguards for data transfer to third countries: Standard Contractual Clauses (SCC) of the EU

3. Supplier/service provider contacts

a. Procurement

In the context of our business activities, the term "procurement" refers to all processes associated with the purchase of goods and services. This includes pre-contractual measures such as contract negotiations and the corresponding communication on purchasing. The personal data listed here is processed for the identification and evaluation of potential suppliers/service providers and the subsequent contract negotiations.

Processed data categories: company master data (first name, surname, company name); company contact data (email address, telephone number, postal address of the company); contract data

Purpose of processing: Implementation of pre-contractual measures, in

particular contract negotiations and corresponding communication

Source of the data: We collect this data directly from you.

Obligation to provide the data: There is neither a legal nor a contractual obligation to provide this data. If the data is not provided, it may not be possible to conclude a supplier/service contract.

Legal basis: If you personally are a potential supplier/service provider, we process the data to carry out pre-contractual measures in accordance with Article 6 para. 1 lit. b. GDPR. If you are not personally our potential supplier/service provider (e.g. you are an employee), our legal basis is the so-called legitimate interest pursuant to Article 6 para. 1 lit. f GDPR. Our legitimate interest is the implementation of pre-contractual measures with the potential supplier/service provider or its representative.

Retention period: As soon as we no longer need your personal data for the aforementioned purpose, it will be deleted or restricted immediately and only stored for the purpose of asserting or defending legal claims until the expiry of the three-year limitation period, starting at the end of the year in which the contractual relationship was terminated. In addition, we are obliged to store the data until the end of the statutory retention period, which can be 6 to 10 years.

Recipient category: Software provider, cloud storage provider

Location of the recipients: EU and non-EU

Safeguards for data transfer to third countries: Standard Contractual Clauses (SCC) of the EU

b. Contract performance

In the context of our business activities, the term "contract performance" refers to all measures that are necessary to fulfill the obligations arising from a contract and to demand the fulfillment of the contract by the supplier/service provider. Personal data is processed in order to provide/claim/accept services, process payments and ensure communication in connection with the performance of the contract.

Processed data categories: company master data (first name, surname, company name); company contact data (email address, telephone number, postal address of the company); contract data; bank details and billing and payment data

Purpose of processing: Contract fulfillment with our suppliers/service providers, including the processing and payment of invoices and the provision of any other contractual services on our part, as well as the demand for contract fulfillment by the supplier.

Source of the data: We collect this data directly from you.

Obligation to provide the data: There is neither a legal nor a contractual obligation to provide this data. However, if the data is not provided, we may not be able to fulfill or execute the contract.

Legal basis: In the event that you are personally a supplier/service provider, we process the data to fulfill the contract in accordance with Article 6 para. 1 lit. b. GDPR. If you are not personally our supplier/service provider (e.g. you are an employee), our legal basis is the so-called legitimate interest pursuant to Article 6 para. 1 lit. f GDPR. Our legitimate interest is the fulfillment of our contract with our supplier/service provider.

Retention period: We retain this data for the term of the contract and beyond until the expiry of statutory retention periods, which can be 6 to 10 years.

Recipient category: Software provider, cloud storage provider, payment service provider

Location of the recipients: EU and non-EU

Safeguards for data transfer to third countries: Standard Contractual Clauses (SCC) of the EU

c. Supplier due diligence

As part of the German Supply Chain Due Diligence Act (LkSG), we review our suppliers in order to prevent or minimize human rights or environmental risks or to remedy a violation in accordance with our due diligence obligations. We also process supplier data in order to check whether we have a conflict of interest or a restriction of independence when commissioning a supplier, as well as other legally required background checks

Processed data categories: operational master data of the contact person at the supplier (first name, surname); operational contact data of the contact person at the supplier (e-mail address, postal address); communication data (content of the communication together with documents and information provided).

Purpose of processing: Fulfillment of our due diligence obligations under the Supply Chain Due Diligence Act, verification of conflicts of interest, compliance with other legal obligations

Source of the data: We collect this data directly from you
Obligation to provide the data: There is neither a legal nor a contractual obligation to provide this data. However, in the event of non-provision, we may be forced to request the necessary documents via other contact channels or to terminate the cooperation with you as a supplier.

Legal basis: We process this data in accordance with Article 6 para. 1 lit. c. GDPR in conjunction with the due diligence obligations incumbent on us under Sections 3 and 10 of the German Supply Chain Due Diligence Act. Furthermore, we process this data on the basis of our legitimate interest

pursuant to Art. 6 para. 1 lit. f. GDPR. Our legitimate interests are the avoidance of conflicts of interest and the fulfillment of legal obligations.

Retention period: We store this data for the period of cooperation with our suppliers, but at least seven years after the documentation has been created. Should the contact person change, please let us know so that we can change the master and contact data accordingly.

Recipient category: Software providers, cloud storage providers, authorities (in case of legal obligation)

Location of recipients: EU and non-EU

Safeguards for data transfer to third countries: Standard Contractual Clauses (SCC) of the EU

d. Assertion of and/or defense against legal claims

If necessary, we also process your personal data to assert and/or defend against legal claims.

Processed data categories: All relevant personal data stored by us about you that is necessary for the assertion and/or defense against legal claims and may be processed for this purpose within the framework of legal requirements, i.e. is not subject to any prohibitions on processing.

Purpose of processing: Assertion and/or defense against legal claims.

Source of the data: We collect this data directly from you

Obligation to provide the data: There is neither a legal nor a contractual obligation to provide this data.

Legal basis: We process this data based on our legitimate interest pursuant to Art. 6 para. 1 lit. f. GDPR. Our legitimate interest is the assertion of and/or defense against legal claims.

Retention period: We store this data for as long as it is necessary for the assertion and/or defense against legal claims. As a rule, this is the case until the end of the three-year limitation period, starting at the end of the year in which the contractual relationship was terminated.

Recipient category: Software providers, cloud storage providers, law firms, authorities, courts

Location of recipients: EU and non-EU

Safeguards for data transfer to third countries: Standard Contractual Clauses (SCC) of the EU

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4. On-site visitors

a. Pre-registration

We would like to make your visit to one of our offices as uncomplicated and pleasant as possible. To save you having to fill out a form (see also visitor registration) at reception and to allow you to be greeted directly by your contact person, we may therefore ask you to register in advance.

Processed data categories: Master data (first name, surname); professional data (company name, function); contact data (e-mail address, telephone number); visit data (time and duration of your visit, address of the office visited); other information (vehicle license plate number when using our parking areas, any communicated information on special requirements such as accessibility)

Purpose of processing: Identification of visitors, ensuring the security of our premises and the facilities therein as well as our other property, our visitors and our employees. If specified, to ensure accessibility for your visit or, if this is not possible without disproportionate effort, to organize the visit to another office with guaranteed accessibility.

Source of the data: We collect this data directly from you. If your registration is made at your request by one of your employees or colleagues, the data is collected from these persons.

Obligation to provide the data: There is neither a legal nor a contractual obligation to provide this data. However, please note that on-site visitor registration may be necessary for security reasons and that failure to provide this data may result in you being prohibited from entering our premises for security reasons.

Legal basis: We process this data on the basis of our legitimate interest in making your visit to our office as uncomplicated as possible and ensuring smooth and secure operations in accordance with Art. 6 para. 1 lit. f. GDPR. GDPR. In addition, we also process the data used for identification as well as the time and duration of the visit due to our legal obligation to maintain an appropriate level of data security in accordance with Art. 6 para. 1 lit. c in conjunction with Art. 32 GDPR.

Retention period: We store this data until the end of your visit and for a further 4 weeks thereafter.

Recipient category: None

Location of the recipients: -

Safeguards for data transfer to third countries: -

b. Visitor registration

If we have not asked you to register in advance before visiting one of our offices or if you have declined to do so, we may ask you to register as a visitor at reception.

Processed data categories: Master data (first name, last name); professional data (company name, function); contact data (e-mail address, telephone number); visit data (time and duration of the visit, address of the office visited); other information (vehicle license plate number when using our parking areas, any communicated information on special requirements such as accessibility)

Purpose of processing: Identification of visitors, safeguarding the security of our premises and the facilities contained therein, as well as our other property, our visitors and our employees.

Source of the data: We collect this data directly from you.

Obligation to provide the data: There is no legal or contractual obligation to provide this data. However, please note that if you do not provide this data, you may be prohibited from entering our premises for security reasons.

Legal basis: We process this data on the basis of our legitimate interest in ensuring smooth and secure operations and the security of our property and our employees in accordance with Art. 6 para. 1 lit. f. GDPR. GDPR. Furthermore, we process this data on the basis of our legal obligation to maintain an appropriate level of data security in accordance with Art. 6 para. 1 lit. c. in conjunction with Art. 32 GDPR.

Retention period: We retain this data until the end of your visit and for a further 4 weeks thereafter.

Recipient category: Software provider, cloud storage provider

Location of the recipients: EU and non-EU

Safeguards for data transfer to third countries: Standard Contractual Clauses (SCC) of the EU

c. Assertion of and/or defense against legal claims

If necessary, we also process your personal data to assert and/or defend against legal claims.

Processed data categories: All relevant personal data stored by us about you that is necessary for the assertion and/or defense against legal claims and may be processed for this purpose within the framework of legal requirements, i.e. is not subject to any prohibitions on processing.

Purpose of processing: Assertion and/or defense against legal claims.

Source of the data: We collect this data directly from you

Obligation to provide the data: There is neither a legal nor a contractual obligation to provide this data.

Legal basis: We process this data based on our legitimate interest pursuant to Art. 6 para. 1 lit. f. GDPR. Our legitimate interest is the assertion of and/or defense against legal claims.

Retention period: We store this data for as long as it is necessary for the assertion and/or defense against legal claims. As a rule, this is the case until the end of the three-year limitation period, starting at the end of the year in which the contractual relationship was terminated.

Recipient category: Software providers, cloud storage providers, law firms, authorities, courts

Location of recipients: EU and non-EU

Safeguards for data transfer to third countries: Standard Contractual Clauses (SCC) of the EU

III. Cookies

We use so-called cookies on our website to ensure the functions of our website, to gain knowledge about the use of our website, to be able to show you personalized advertising and to enable the success of our advertising measures. Further information on the cookies used and their categorization can be found in this section under "List of cookies used". We only use cookies that are not technically necessary if you have given us your consent in accordance with Article 6 para. 1 lit. a. GDPR via our cookie banner.

1. General information about cookies

A cookie is a small data package (text file) that your browser stores on your device at the instruction of a website you visit in order to "remember" information about you, such as your language settings or login information. These cookies are set by us and are referred to as first-party cookies. We also use third-party cookies, which come from a different domain to the website you are visiting. We use these cookies to support our advertising and marketing efforts.

2. Management of the cookies used

You can manage your selection of cookies and thus the consent you have given at any time via the cookie settings. You can access these settings at any time from any subpage of our website by clicking on the green cookie symbol at the bottom left of the website.

3. List of cookies used

The following list informs you about the cookies we use. A distinction is made between strictly necessary cookies and non-essential cookies. Non-essential cookies are only loaded after you have given your consent. Protiviti Deutschland uses performance cookies and cookies for marketing purposes as non-necessary cookies.

a. Strictly necessary cookies

Strictly necessary cookies are always enabled as they enable core website functionality such as user logins, account management, privacy settings, form filling and switching between websites without losing any of your previous actions. Strictly necessary cookies are exempt from obtaining user consent as they are essential for the proper functioning of the website and for security purposes. We cannot switch off essential cookies in our systems, but you can set your browser to block or alert you about these cookies. If you choose to block strictly necessary cookies, some parts of the website may not work. These cookies do not usually store any personal data unless they are necessary to deliver the requested service, e.g. when you log in to our website. All other cookies and tracking technologies that are not classified as strictly necessary require the prior consent of website visitors.

b. Performance cookies

These cookies allow us to count visits and traffic sources so that we can measure and improve the performance of our website. They help us answer questions about which pages are most popular, which are least used and how visitors move around the site. All information collected by these cookies is aggregated and therefore anonymous. If you do not allow these cookies, we will not know when you have visited our website.

We use the following performance cookies:

Cookie domain	Cookies	Cookies used	Retention period
Protiviti.com	_gid , _ga , _gat_UA-nnnnnnn-nn , _ga_xxxxxxxxxx	First party	Few seconds, 398 days, few seconds, 398 days

c. Cookies for marketing purposes

These cookies may be set through our website by our advertising partners. They may be used by these companies to build a profile of your interests and show you relevant ads on other websites. They do not directly store personal data, but are based on a unique identification of your browser and internet device. If you do not allow these cookies, you will experience less targeted advertising. Our cookies for marketing purposes also include social media cookies. These cookies are set by a range of social media services that we use on the website to enable you to share our content with your friends and networks. These cookies are able to track your browser across other websites and build a profile of your interests. This may affect the content and messages you see on other websites. If you do not allow these cookies, you may not be able to use or see these sharing tools.

We use the following cookies for marketing purposes (incl. social media cookies):

Cookie subdomain	Cookies	Cookies used	Retention period
protiviti.com	__utmzzses , _gcl_au , _gat_UA-XXXXXX-X	First party	363 days, 88 hours, few seconds
youtube.com	VISITOR_INFO1_LIVE, VISITOR_PRIVACY_METADATA, YSC	Third party	179 days, 179 days, 364 days
on24.com	uid783829, avoidCachingSystem	Third party	362 days, 362 days
www.youtube.com	TESTCOOKIESENABLED	Third party	Few seconds
linkedin.com	AnalyticsSyncHistory,cf_bm, lidc, li_sugr, UserMatchHistory, bcookie, li_gc	Third party	29 days, few seconds, few seconds, 89 days, 29 days, 364 days, 179 days
gateway.on24.com	BIGipServerwccv_cache, BIGipServerwccorionprd_wl, JSESSIONID	Third party	362 days, 362 days, 362 days

IV. Automated decision making & use of artificial intelligence

We use artificial intelligence ("AI") for market research and to increase the efficiency of our internal processes and the provision of our services to customers.

We use Azure OpenAI, provided by Microsoft Corporation (One Microsoft Way, Redmont, WA 98052-6399, USA), in our closed cloud environment. The inputs (prompts), the outputs (responses) and our embeddings (documents uploaded to the AI):

- Are not available to other Azure customers
- Are not available to Microsoft
- Are not used to optimize/train the OpenAI models
- Not used to optimize/train Microsoft or third-party products and services
- Are not used for automated decision making or profiling; and
- Are not used to automatically optimize/train Azure OpenAI models for your use in your resource

Our employees in the EEA, UK and Switzerland are prohibited from using personal data in prompts. If the output generated by the AI contains personal data, our employees are instructed not to use the personal data and to delete the entire output after closing their session.

For more information about our AI tool, please contact

ProtivitiITAITeam@protiviti.com.

V. Recipients

As a globally operating group, we carry out some activities centrally for certain regions or worldwide in sister companies (recognizable by the company names "Robert Half" and/or "Protiviti"). You can obtain further information about our group companies using the contact details provided at the beginning of this statement, provided you are authorized to receive this information. Personal data may be transferred to these group companies in order to ensure efficient and consistent business operations and to maintain appropriate control over our business activities. In some business areas, there are also matrix structures, which means that superiors of our employees may be employed in other companies and may therefore obtain knowledge of personal data to ensure effective management and organization within the Group. In these cases, these group companies act as our processors under our instructions with regard to the processing of your personal data. We also use independent service providers who act as processors. These service providers include software providers, cloud providers, marketing agencies, financial service providers, subcontractors and technical support companies that are necessary for the fulfillment of our business purposes and help us to improve the quality of our services and offer innovative solutions. When working with these service providers, we bind them to data protection compliance by means of an order processing contract and do not allow them to process data for their own purposes. In addition, personal data may be passed on to independent controllers such as tax consultants, auditors, law firms, courts or authorities, insofar as this is permitted or we are legally obliged to do so in order to meet legal requirements, to ensure compliance and to assert or defend against legal claims. As part of our cooperation with processors and independent controllers, we attach great importance to compliance with the level of data protection in the European Union. For this purpose, these partners, if they are not already subject to EU data protection law, undertake to comply with EU data protection standards by means of the standard contractual clauses provided by the EU. Through this contractual agreement, we ensure that the transfer of personal data to third parties outside the EU or the European Economic Area is carried out in accordance with the strict requirements of EU data protection law. Further information on the transfer of your personal data can be found in this privacy policy under the individually listed processing purposes.

VI. Data security

We have put appropriate technical and organizational security measures in place to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we restrict access to your personal data to those employees, agents, contractors and other third parties who have a business need to know and are legally authorized to use it. We have put in place procedures to deal with any suspected personal data breach and will notify you and the relevant regulator of a breach where we are legally required to do so.

VII. Links to other websites

Our website contains links to other websites, plug-ins and applications from third-party providers. If you click on these links or activate these connections, these providers may receive and process data from you. We have no influence on the processing of your personal data by these third parties and ask you to inform yourself about their data protection information about the processing there.

VIII. Your rights

1. Right to withdraw consent – Article 7 para. 3 GDPR

If the processing is based on your consent, you can withdraw this consent at any time with effect for the future. This does not affect the lawfulness of the processing for the period prior to your withdrawal. Please note that if you withdraw your consent, we will no longer be able to offer you certain services, such as sending you our newsletter.

2. Right of access to the data subject – Article 15 GDPR

You have the right to request access at any time about how and which personal data we process about you. If you make such a request, you will also receive a copy of the personal data we have stored about you. If these copies contain confidential information or personal data of other data subjects, we will black them out accordingly or alternatively inform you which personal data is contained on these copies and for what purposes.

3. Right to rectification – Article 16 GDPR

If the personal data we have stored about you is incorrect or incomplete, you have the right to request immediate rectification and/or completion at any time.

4. Right to erasure – Article 17 GDPR

You have the right to request that we delete your personal data at any time. We will comply with this request immediately, unless we are subject to legal obligations that prohibit deletion at this time. This may be the case, for example, if we are obliged to store your data for a longer period for tax law reasons. If this applies to you, we will inform you of this upon your request for deletion, restrict processing for purposes other than storage and delete the data immediately after expiry of the statutory retention periods, without the need for any further request from you.

5. Right to restriction of processing – Article 18 GDPR

In addition to the right to erasure, you also have the right to request that we restrict the processing of your personal data if

- You dispute that the personal data we have stored about you is correct until we have had the opportunity to verify the accuracy of the data.

- our processing of your personal data is unlawful, but you oppose the erasure of the personal data and request the restriction of their use instead.

- We no longer need your personal data, but you need it for the establishment, exercise or defense of legal claims, or

- you object to the processing in accordance with your right under Article 21 GDPR and it has not yet been determined whether our interests outweigh yours.

6. Right to data portability – Article 20 GDPR

You have the right to receive the personal data you have provided to us in a structured, commonly used and machine-readable format, insofar as this is technically feasible. In addition, you have the right to request that we transmit this data to another controller without hindrance from us.

7. Right to object – Article 21 GDPR

You have the right to object under the conditions of Article 21 GDPR. You have the possibility to object to the processing based on Article 6 para. 1 lit. f. GDPR at any time for reasons arising from your particular situation. This also applies accordingly to profiling based on these provisions. The information as to whether processing is based on Article 6 para. 1 lit. f. GDPR can be found in the above descriptions of the processing operations.

8. Automated individual decision-making, including profiling – Article 22 GDPR

According to Art. 22 GDPR, you have the right not to be subject to a decision based solely on automated processing - including profiling - which produces legal effects concerning you or similarly significantly affects you. However, we do not currently use such methods.

9. Right to lodge a complaint with a supervisory authority – Article 77 GDPR

Independently of and in addition to the rights listed, you have the right to lodge a complaint with the supervisory authority if you believe that the processing of your personal data violates the GDPR. The following supervisory authority is responsible for us:

Der Hessische Beauftragte für Datenschutz und Informationsfreiheit
Gustav-Stresemann-Ring 1, 65189 Wiesbaden
Postbox 31 63, 65021 Wiesbaden
Telephone: 0611-1408 0
Telefax: 0611-1408 611
E-Mail: poststelle@datenschutz.hessen.de
Website: https://datenschutz.hessen.de

However, we ask you to give us the opportunity to discuss your concerns with you before making a complaint in order to find an uncomplicated and satisfactory solution for you. You can contact our data protection team at any

time by emailing privacy-emea@protiviti.com or by contacting our external data protection officer using the contact details provided at the beginning of this policy.