

## **Simm Spielwaren GmbH privacy policy for online meetings, conference calls and webinars via “Microsoft Teams”.**

In the following we would like to inform you about the processing of personal data in connection with the use of "**Microsoft Teams**".

### **Purpose of processing**

We use the "Microsoft Teams" tool to hold telephone conferences, online meetings, video conferences and/or webinars (hereinafter "online meetings"). "Microsoft Teams" is a service from the Microsoft Corporation.

### **Data controller**

The **data controller** responsible for the data processing that takes place in direct connection with the implementation of online meetings is the company: Simm Spielwaren GmbH, Wallersbacher Weg 2, 91154 Roth, Germany, info@simm-spielwaren.com, +49 (0)9171 954-0

**Note:** As soon as you visit the "Microsoft Teams" website, the provider of "Microsoft Teams" is responsible for the data processing. Visiting the website is only required to download the software necessary to use “Microsoft Teams”.

If you do not want to or cannot use the "Microsoft Teams" app, you can also use "Microsoft Teams" via your browser. The service is then also provided via the “Microsoft Teams” website.

### **What data is processed?**

Different types of data are processed when using "Microsoft Teams". The scope of the data also depends on the data you provide before or during participation in an "online meeting".

The following personal data is processed:

**Information about the user:** e.g. display name, email address where applicable, profile picture (optional), preferred language

**Meeting metadata:** e.g. date, time, meeting ID, phone numbers, location

**Text, audio and video data:** you may have the option of using the chat function in an "online meeting". In this respect, the text entries you type are processed in order to display them in the online meeting. In order to enable the display of video and the playback of audio, data from your device's microphone and video camera will be processed accordingly during the meeting. You can switch off the camera or mute the microphone at any time when using the "Microsoft Teams" applications.

## **Scope of processing**

We use "Microsoft Teams" to conduct online meetings. If we want to record online meetings, we will inform you transparently in advance and – if necessary – ask for your consent.

If necessary for the purpose of logging the results of an online meeting, we will log the chat content. However, this will usually not be the case.  
Automated decision-making within the meaning of Art. 22 GDPR is not used.

## **Legal basis of data processing**

Insofar as personal data is processed by Simm Spielwaren employees, § 26 of the Federal Data Protection Act (*Bundesschutzgesetz*, BDSG) is the legal basis for data processing. If, in connection with the use of "Microsoft Teams", personal data is not required for the establishment, implementation or termination of the employment relationship, but is an elementary component in the use of "Microsoft Teams", Art. 6 para. 1 lit. f) GDPR is the legal basis for data processing. In these cases, our interest is in the effective implementation of online meetings.

Apart from this, the legal basis for data processing when conducting online meetings is Art. 6 para. 1 lit. b) GDPR, insofar as the meetings are held in the context of contractual relationships.

If there is no contractual relationship, the legal basis is Art. 6 para. 1 lit. f) GDPR. Here, too, our interest is in the effective implementation of online meetings.

## **Recipients of data/disclosure of data**

Personal data processed in connection with participation in online meetings is generally not passed on to third parties unless it is intended to be passed on. Please note that content from online meetings as well as from personal meetings is often used to communicate information to customers, interested parties or third parties and is therefore intended to be passed on.

Other recipients: The provider of "Microsoft Teams" necessarily receives knowledge of the above data, insofar as this is specified in our order processing contract with "Microsoft Teams".

## **Data processing outside the European Union**

Data processing does not take place outside the European Union (EU), as we have limited our storage locations to data centres within the European Union. However, we cannot rule out that data is routed via internet servers that are located outside the EU. This can be the case in particular if participants in an online meeting are in a third country.

However, the data is encrypted while it is being transported over the internet and is therefore protected against unauthorised access by third parties.

## **Data protection officer**

We have appointed a data protection officer.

Their contact details are as follows:

Projekt 29 GmbH & Co. KG Ostengasse 14 in 93047, Regensburg, Germany

Tel. +49 (0)941-2986930 Email: anfragen@projekt29.de

## **Your rights as a data subject**

You have the right to request **information** about the personal data we have stored about you. You can contact us for information at any time.

In the case of a request for information that is not made in writing, we ask for your understanding that we may then require proof from you that you are the person you claim to be.

Furthermore, you have a right to request the **rectification** or **deletion** of data about you, or to request the **restriction** of its processing, insofar as you are legally entitled to do so.

Furthermore, you have the **right to object** to processing within the framework of legal requirements.

A right to **data portability** also exists within the framework of data protection regulations.

## **Deletion of data**

We generally delete personal data if there is no need for further storage. A storage requirement can exist in particular if the data is still required to fulfil contractual services, to check warranty claims and, if applicable, guarantee claims and to be able to grant or defend them. In the case of statutory retention requirements, deletion can only be considered after the respective retention obligation has expired.

## **Right to lodge a complaint with a supervisory authority**

You have the right to complain to a **supervisory authority** about our processing of your personal data.

## **Changes to this privacy policy**

We revise this privacy policy in the event of changes to data processing or other occasions that make this necessary. The current version can always be found on this website.

Version: 15.09.2020