

Privacy policy

We are pleased that you are visiting our website. The protection and security of your personal information when using our website is very important to us. We would therefore like to take this opportunity to inform you which of your personal data we collect when you visit our website and for what purposes it is used.

This privacy policy applies to our website, which is accessible under this domain and the various subdomains („our website“).

Objection to advertising e-mails

We hereby object to the use of the contact data published in the legal notice, the data protection notice and other contact data published on the website for sending unsolicited advertising and information material. The operators of the website expressly reserve the right to take legal action in the event of the unsolicited sending of advertising information, such as spam e-mails.

Who is responsible and how can I reach you?

Person responsible

for the processing of personal data within the meaning of the EU General Data Protection Regulation (GDPR):

FREY & Co. GmbH
Papyrerstraße 12,
83661 Lenggries-Fleck

Data Protection Officer:

Stephan Krischke, datenschutz@frey-systeme.de

What is it about?

This privacy policy fulfills the legal requirements for transparency in the processing of personal data. This is any information relating to an identified or identifiable natural person. This includes, for example, information such as your name, age, address, telephone number, date of birth, e-mail address, IP address or user behavior when visiting a website. Information for which we cannot (or only with disproportionate effort) establish a connection to your person, e.g. through anonymization, is not personal data. The processing of personal data (e.g. the collection, retrieval, use, storage or transmission) always requires a legal basis and a defined purpose.

Stored personal data will be deleted as soon as the purpose of the processing has been achieved and there are no legitimate reasons for further storage of the data. We will inform you about the specific storage periods or criteria for storage in the individual processing operations. Irrespective of this, we store your personal data in individual cases for the assertion, exercise or defense of legal claims and in the event of statutory retention obligations..

Who receives my data?

Your personal data will not be transferred to third parties for purposes other than those listed below.

We only pass on your personal data to third parties if:

- you have given us your express consent to do so in accordance with Art. 6 para. 1 lit. a GDPR,
- the disclosure is permitted in accordance with Art. 6 para. 1 lit. f GDPR to protect our legitimate interests

and there is no reason to assume that you have an overriding interest worthy of protection in not disclosing your data,

- in the event that there is a legal obligation for disclosure pursuant to Art. 6 para. 1 lit. c GDPR, and
- this is legally permissible and necessary for the processing of contractual relationships with you in accordance with Art. 6 para. 1 lit. b GDPR.

In order to protect your data and, if necessary, to enable us to transfer data to third countries (outside the EU/EEA), we have concluded data processing agreements based on the European Commission's standard contractual clauses. If the standard contractual clauses are not sufficient to establish an adequate level of security, your consent may serve as the legal basis for the transfer to third countries in accordance with Art. 49 para. 1 lit. a) GDPR. This does not apply in the case of data transfers to third countries for which the European Commission has issued an adequacy decision pursuant to Art. 45 GDPR.

As part of the processing operations described in this Privacy Policy, personal data may be transferred to the USA. In particular, US investigative authorities may oblige US companies to hand over or disclose personal data without the data subjects being able to take effective legal action against this. This means that there is a fundamental possibility that your personal data will be processed by US investigative authorities. We have no influence on these processing activities. Data is transferred to the USA in accordance with Art. 45 para. 1 GDPR on the basis of the European Commission's adequacy decision. The US companies involved and/or their US subcontractors are certified in accordance with the EU-U.S. Data Privacy Framework (EU-U.S. DPF). In cases where no adequacy decision of the European Commission exists (including US companies that are not certified under the EU-U.S. DPF), we have agreed other appropriate safeguards with the recipients of the data within the meaning of Art. 44 et seq. GDPR have been agreed. Unless otherwise stated, these are standard contractual clauses of the EU Commission in accordance with Implementing Decision (EU) 2021/914 of June 4, 2021. You can view a copy of these standard contractual clauses at <https://eur-lex.europa.eu/legal-content/DE/TXT/HTML/?uri=CELEX:32021D0914&from=DE>. If the standard contractual clauses are not sufficient to establish an adequate level of security or if it is not possible to conclude the standard contractual clauses, your consent may serve as the legal basis for the transfer in accordance with Art. 49 para. 1 lit. a) GDPR..

Do you use cookies?

Cookies are small text files that are sent by us to the browser of your end device and stored there when you visit our website. As an alternative to the use of cookies, information can also be stored in the local storage of your browser. Some functions of our website cannot be offered without the use of cookies or local storage (technically necessary cookies). Other cookies, on the other hand, enable us to carry out various analyses, so that we are able, for example, to recognize the browser you are using when you visit our website again and to transmit various information to us (non-essential cookies). With the help of cookies, we can, among other things, make our website more user-friendly and effective for you, for example by tracking your use of our website and determining your preferred settings (e.g. country and language settings). If third parties process information via cookies, they collect the information directly via your browser. Cookies do not cause any damage to your end device. They cannot execute programs or contain viruses.

We provide information about the respective services for which we use cookies in the individual processing operations. Detailed information on the cookies used can be found in the cookie settings or in the Consent Manager of this website.

What rights do I have?

Under the conditions of the statutory provisions of the General Data Protection Regulation (GDPR), you have the following rights as a data subject:

- **Information** in accordance with Art. 15 GDPR about the personal data stored about you in the form of meaningful information on the details of the processing and a copy of your data;
- **Correction** in accordance with Art. 16 GDPR of incorrect or incomplete data stored by us;
- **Deletion** in accordance with Art. 17 GDPR of the data stored by us, unless the processing is necessary to exercise the right to freedom of expression and information, to fulfill a legal obligation, for reasons of public interest or to assert, exercise or defend legal claims;
- **restriction of** processing pursuant to Art. 18 GDPR if the accuracy of the data is contested, the processing is unlawful, we no longer need the data and you oppose the erasure of the data because you need it for the establishment, exercise or defense of legal claims or you have objected to processing pursuant to Art. 21 GDPR.
- **Data portability** pursuant to Art. 20 GDPR, insofar as you have provided us with personal data on the basis of consent pursuant to Art. 6 para. 1 lit. a GDPR or on the basis of a contract pursuant to Art. 6 para. 1 lit. b GDPR and these have been processed by us using automated procedures. You will receive your data in a structured, commonly used and machine-readable format or we will transmit the data directly to another controller if this is technically feasible.
- **Objection** pursuant to Art. 21 GDPR to the processing of your personal data, insofar as this is carried out on the basis of Art. 6 para. 1 lit. e, f GDPR and there are reasons for this arising from your particular situation or the objection is directed against direct advertising. The right to object does not exist if overriding, compelling legitimate grounds for the processing can be demonstrated or the processing is for the establishment, exercise or defense of legal claims. If the right to object does not exist for individual processing operations, this is indicated there.
- **Revocation** pursuant to Art. 7 para. 3 GDPR of your consent with effect for the future.
- **Complaint** pursuant to Art. 77 GDPR to a supervisory authority if you believe that the processing of your personal data violates the GDPR. As a rule, you can contact the supervisory authority of your usual place of residence, your workplace or our company headquarters

How is my data processed in detail?

Below we inform you about the individual processing operations, the scope and purpose of the data processing, the legal basis, the obligation to provide your data and the respective storage period. There is no automated decision-making in individual cases, including profiling.

Provision of the website

Type and scope of processing

When you access and use our website, we collect the personal data that your browser automatically transmits to our server. The following information is temporarily stored in a so-called log file:

- IP address of the requesting computer
- Date and time of access
- Name and URL of the retrieved file
- Website from which the access is made (referrer URL)
- Browser used and, if applicable, the operating system of your computer, as well as the name of your access provider

Our website is not hosted by us, but by a service provider who processes the aforementioned data on our behalf in accordance with Art. 28 GDPR.

Purpose and legal basis

Processing is carried out to safeguard our overriding legitimate interest in displaying our website and ensuring security and stability on the basis of Art. 6 (f) GDPR. The collection of data and storage in log files is absolutely necessary for the operation of the website. There is no right to object to the processing due to the exception under Art. 21 para. 1 GDPR. Insofar as further storage of the log files is required by law, the processing is carried out on the basis of Art. 6 para. 1 lit. c GDPR. There is no legal or contractual obligation to provide the data, but it is not technically possible to access our website without providing the data..

Storage duration

The aforementioned data is stored for the duration of the display of the website and - for technical reasons - for a maximum of 7 days thereafter.

Contact form

Type and scope of processing

Personal data is collected when you contact us (e.g. via contact form or email). Which data is collected in the case of a contact form can be seen from the respective contact form. You can also voluntarily provide additional information that you believe is necessary to process the contact request.

When using the contact form, your personal data will not be passed on to third parties.

Purpose and legal basis

The processing of your data by using our contact form is carried out for the purpose of communication and processing your request on the basis of your consent in accordance with Art. 6 para. 1 lit. a GDPR. Insofar as your request relates to an existing contractual relationship with us, the processing is carried out for the purpose of fulfilling the contract on the basis of Art. 6 para. 1 lit. b GDPR. There is no legal or contractual obligation to provide your data, but it is not possible to process your request without providing the information in the mandatory fields. If you do not wish to provide this data, please contact us by other means.

Storage duration

If you use the contact form on the basis of your consent, we will store the data collected for each inquiry for a period of three years, starting from the time your inquiry is dealt with or until you withdraw your consent.

If you use the contact form as part of a contractual relationship, we store the data collected for each inquiry for a period of three years from the end of the contractual relationship.

Contact form for applicants

Type and scope of processing

We collect and process the personal data of applicants. Corresponding data processing may also be carried out electronically, for example when applicants send us application documents by e-mail or via a web form on our website. On our website, we offer you the opportunity to send us applications for advertised vacancies by e-mail.

Your data will also only be stored in an applicant database beyond the current application process if you have given us your separate consent to do so.

Purpose and legal basis

The legal basis for the processing of your personal data in this application procedure is primarily Art. 6 para. 1 lit. b) GDPR. This permits the processing of data required in connection with the decision to establish an employment relationship. This also includes, if available, the use of the online application portal. If special types of personal data within the meaning of Art. 9 GDPR are processed (e.g. health data), the legal basis is Section 26 (3) BDSG or Art. 9 (2) (b) GDPR in conjunction with Art. 6 (1) (f) GDPR. Art. 6 para. 1 lit. b) GDPR. If your application documents are forwarded to third parties, in particular to companies affiliated with us, and if your data is stored beyond the current application procedure, your data will be processed on the basis of Art. 6 para. 1 sentence 1 lit. a GDPR in conjunction with Art. 26 para. 2 BDSG. § 26 para. 2 BDSG. There is no legal or contractual obligation to provide your data, but it is not possible to process your application without providing the information.

Storage duration

Applicant data will be deleted after 6 months in the event of rejection. In the event that you have consented to your personal data being stored further, we will transfer your data to our applicant pool. There the data will be deleted after 24 months.

Presence on social media platforms

We maintain so-called fan pages or accounts or channels on the networks listed below in order to provide

you with information and offers within social networks and to offer you further ways to contact us and find out about our offers. In the following, we will inform you which data we or the respective social network process in connection with your accessing and using our fan pages/accounts.

Data that we process from you

If you wish to contact us via Messenger or via Direct Message via the respective social network, we generally process your user name, which you use to contact us, and may store other data provided by you insofar as this is necessary to process/answer your request.

The legal basis is Art. 6 para. 1 sentence 1 f) GDPR (processing is necessary for the purposes of the legitimate interests pursued by the controller).

(Static) usage data that we receive from the social networks

We receive automated statistics regarding our accounts via Insights functionalities. The statistics include the total number of page views, likes, information on page activities and post interactions, reach, video views/views and information on the proportion of men/women among our fans/followers.

The statistics only contain aggregated data that cannot be related to individual persons. They are not identifiable to us.

It is not possible for us to draw conclusions about individual users by means of the statistical information transmitted. We only use this information to respond to the interests of our users and to continuously improve our online presence and ensure its quality.

What data the social networks process from you

In order to view the content of our fan pages or accounts, you do not have to be a member of the respective social network and therefore no user account is required for the respective social network.

Please note, however, that the social networks also collect and store data from website visitors without a user account when the respective social network is accessed (e.g. technical data in order to be able to display the website to you) and use cookies and similar technologies, over which we have no influence whatsoever. Details on this can be found in the privacy policy of the respective social network (see the corresponding links above)

If you wish to interact with the content on our fan pages/accounts, e.g. comment on, share or like our posts/contributions and/or wish to contact us via messenger functions, you must first register with the respective social network and provide personal data.

We have no influence on the data processing by the social networks in the context of your use. To the best of our knowledge, your data is stored and processed in particular in connection with the provision of the services of the respective social network, as well as for the analysis of user behavior (using cookies, pixels/web beacons and similar technologies) on the basis of which advertising based on your interests is displayed both within and outside the respective social network. It cannot be ruled out that your data will also be stored by the social networks outside the EU/EEA and passed on to third parties.

Due to the fact that the actual data processing is carried out by the provider of the social network, our access options to your data are limited. Only the provider of the social network is authorized to have full access to your data. As a result, only the provider can directly take and implement appropriate measures to fulfill your user rights (request for information, request for deletion, objection, etc.). The most effective way to assert your rights is therefore to contact the respective provider directly.

Purpose and legal basis

We only collect your data via our profile in order to realize a possible provision for communication and interaction with us. This collection generally includes your name, message content, comment content and the profile information you provide „publicly“.

The processing of your personal data for the above-mentioned purposes is based on our legitimate business and communicative interest in offering an information and communication channel in accordance with Art. 6 (1) f) GDPR. If you as a user have given your consent to data processing to the respective provider of the social network, the legal basis for processing extends to Art. 6 para. 1 a), Art. 7 GDPR.

YouTube-channel

When you visit our YouTube channel, Google collects, among other things, your IP address and other information that is stored on your PC in the form of cookies. This information is used to provide us, as the operator of the YouTube channel, with statistical information about the use of the YouTube channel.

We are jointly responsible with Google for the personal content of the channel. Data subject rights can be asserted with Google Ireland Limited and with us.

We do not make any decisions regarding the processing of personal data and the storage duration of cookies on user end devices.

You can find further information directly on Google: <https://cloud.google.com/terms/data-processing-addendum>

For more information, including the exact scope and purposes of the processing of your personal data, the storage period/deletion and guidelines on the use of cookies and similar technologies in the context of registration and use, please refer to Google's privacy policy/cookie policy: <https://policies.google.com/privacy>.

The company is certified in accordance with the „EU-US Data Privacy Framework“ (DPF). The DPF is an agreement between the European Union and the USA that is intended to ensure compliance with European data protection standards for data processing in the USA. Every company certified under the DPF undertakes to comply with these data protection standards. Further information on this can be obtained from the provider at the following link: <https://www.dataprivacyframework.gov/s/participant-search/participant-detail?contact=true&id=a2zt000000001L5AAI&status=Active>.

LinkedIn-page

LinkedIn is a social network of LinkedIn Inc. based in Sunnyvale, California, USA, which enables the creation of private and professional profiles of natural persons and company profiles. Users can maintain their existing contacts and make new ones within the social network. Companies and other organizations can create profiles where photos and other company information can be uploaded to present themselves as employers and recruit employees. Other LinkedIn users have access to this information and can write their own articles and share this content with others. The focus of the network is on professional exchange on specialist topics with people who have the same professional interests.

When using or visiting the network, LinkedIn automatically collects data from users or visitors, such as user name, job title and IP address. This is done with the help of various tracking technologies. LinkedIn provides users with information, offers and recommendations based on the data collected in this way, among other things.

We are jointly responsible with LinkedIn for the personal content of our company profile. Data subject

rights can be asserted with LinkedIn Inc. as well as with us.

We do not make any decisions regarding the data collected on the LinkedIn site using tracking technologies.

If you wish to deactivate LinkedIn advertising cookies, please use the following link: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.

You can find more information about LinkedIn at: <https://about.linkedin.com>.

Further information on data protection at LinkedIn can be found at: <https://www.linkedin.com/legal/privacy-policy>.

Further information on storage duration/deletion as well as guidelines on the use of cookies and similar technologies in the context of registration and use at LinkedIn can be found at: https://de.linkedin.com/legal/cookie-policy?trk=homepage-basic_footer-cookie-policy.

Data transfer to the USA is based on the standard contractual clauses of the EU Commission. Details can be found at: <https://www.linkedin.com/legal/l/dpa> and <https://www.linkedin.com/legal/l/eu-sccs>.

Technology

SSSL/TLS encryption

This site uses SSL or TLS encryption to ensure the security of data processing and to protect the transmission of confidential content, such as orders, login data or contact requests that you send to us as the operator. You can recognize an encrypted connection by the „https://“ in the address line of the browser instead of „http://“ and by the lock symbol in your browser line.

If SSL or TLS encryption is activated, the data you transmit to us cannot be read by third parties.

Google APIs

Type and scope of processing

We use Google APIs from Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, to access additional services and data from Google Ireland Limited. Your IP address will be transmitted to Google Ireland Limited. Please note that there is a separate section in this privacy policy for each additional service we use from Google Ireland Limited.

Purpose and legal basis

The use of Google APIs is based on our legitimate interests, i.e. interest in optimizing our online offer in accordance with Art. 6 para. 1 lit. f. GDPR.

Storage duration

The specific storage period of the processed data cannot be influenced by us, but is determined by Google Ireland Limited. Further information can be found in the privacy policy for Google APIs: <https://policies.google.com/privacy>.

Google Analytics

Type and scope of processing

We use Google Analytics from Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, as an analysis service for the statistical evaluation of our online offering. This includes, for example, the number of visits to our online offering, subpages visited, and the length of time visitors spend on our website.

Google Analytics uses cookies and other browser technologies to evaluate user behavior and recognize users.

This information is used, among other things, to compile reports on website activity.

Purpose and legal basis

The use of Google Analytics is based on your consent in accordance with Art. 6 para. 1 lit. a. GDPR and § 25 para. 1 TDDDG.

Storage duration

The specific storage period for the processed data cannot be influenced by us but is determined by Google Ireland Limited. Further information can be found in the privacy policy for Google Analytics: <https://policies.google.com/privacy>.

Google CDN

Type and scope of processing

We use Google CDN to properly provide the content of our website. Google CDN is a service of Google Ireland Limited, which acts as a content delivery network (CDN) on our website.

A CDN helps to make the content of our online offering, in particular files such as graphics or scripts, available more quickly with the help of regionally or internationally distributed servers. When you access this content, you establish a connection to the servers of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, whereby your IP address and possibly browser data such as your user agent are transmitted. This data is processed exclusively for the above-mentioned purposes and to maintain the security and functionality of Google CDN.

Purpose and legal basis

The use of the Content Delivery Network is based on our legitimate interests, i.e. interest in the secure and efficient provision and optimization of our online offer in accordance with Art. 6 para. 1 lit. f. GDPR.

Storage duration

The specific storage period of the processed data cannot be influenced by us but is determined by Google Ireland Limited. Further information can be found in the privacy policy for Google CDN: <https://policies.google.com/privacy>.

Google Fonts

Type and scope of processing

We use Google Fonts from Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, as a service to provide fonts for our online offering. To obtain these fonts, you establish a connection to the servers of Google Ireland Limited, whereby your IP address is transmitted.

Purpose and legal basis

The use of Google Fonts is based on your consent in accordance with Art. 6 para. 1 lit. a. GDPR and § 25 para. 1 TDDDG.

Storage duration

The specific storage period of the processed data cannot be influenced by us, but is determined by Google Ireland Limited. Further information can be found in the privacy policy for Google Fonts: <https://policies.google.com/privacy>.

Google Maps

Type and scope of processing

We use Google Maps to create directions. Google Maps is a service provided by Google Ireland Limited, which displays a map on our website.

When you access this content on our website, you establish a connection to servers of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, whereby your IP address and possibly browser data such as your user agent are transmitted. This data is processed exclusively for the above-mentioned purposes and to maintain the security and functionality of Google Maps.

Purpose and legal basis

The use of Google Maps is based on your consent in accordance with Art. 6 para. 1 lit. a. GDPR and § 25 para. 1 TDDDG.

Storage duration

The specific storage period of the processed data cannot be influenced by us, but is determined by Google Ireland Limited. Further information can be found in the privacy policy for Google Maps: <https://policies.google.com/privacy>.

Google reCAPTCHA

Type and scope of processing

We have integrated Google reCAPTCHA components on our website. Google reCAPTCHA is a service of Google Ireland Limited and enables us to distinguish whether a contact request comes from a natural person or is automated by means of a program. When you access this content, you establish a connection to the servers of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, whereby your IP address and possibly browser data such as your user agent are transmitted. Furthermore, Google reCAPTCHA records the time spent on the website and the user's mouse movements in order to distinguish automated requests from human requests. This data is processed exclusively for the above-mentioned purposes and to maintain the security and functionality of Google reCAPTCHA.

Purpose and legal basis

The use of Google reCAPTCHA is based on your consent in accordance with Art. 6 para. 1 lit. a. GDPR and § 25 para. 1 TDDDG.

Storage duration

The specific storage period of the processed data cannot be influenced by us, but is determined by Google Ireland Limited. Further information can be found in the privacy policy for Google reCAPTCHA: <https://policies.google.com/privacy?hl=en-US>.

YouTube Video

Type and scope of processing

We have integrated YouTube Video on our website. YouTube Video is a component of the video platform of YouTube, LLC, on which users can upload content, share it over the Internet and receive detailed statistics.

YouTube Video enables us to integrate content from the platform into our website.

YouTube Video uses cookies and other browser technologies to evaluate user behaviour, recognize users and create user profiles. This information is used, among other things, to analyze the activity of the content listened to and to create reports. If a user is registered with YouTube, LLC, YouTube Video can assign the videos played to the profile.

When you access this content, you establish a connection to the servers of YouTube, LLC, Google Ireland Limited, Gordon House, Barrow Street Dublin 4 Ireland, whereby your IP address and possibly browser data such as your user agent are transmitted.

Purpose and legal basis

The use of the service is based on your consent in accordance with Art. 6 para. 1 lit. a. GDPR and § 25 para. 1 TDDDG.

Storage duration

The specific storage period of the processed data cannot be influenced by us, but is determined by YouTube, LLC. Further information can be found in the privacy policy for YouTube Video: <https://policies.google.com/privacy>.

etracker

Type and scope of processing

We use etracker from etracker GmbH, Erste Brunnenstraße 1 20459 Hamburg Germany, as an analysis service for the statistical evaluation of our online offer. This includes, for example, the number of visits to our website, subpages visited and the time spent by visitors.

etracker uses cookies and other browser technologies to evaluate user behavior and recognize users.

This information is used, among other things, to compile reports on website activity.

Purpose and legal basis

The use of etracker is based on your consent in accordance with Art. 6 para. 1 lit. a. GDPR and § 25 para. 1 TDDDG.

Storage duration

The specific storage period of the processed data cannot be influenced by us, but is determined by etracker GmbH. Further information can be found in the privacy policy for etracker: <https://www.etracker.com/datenschutz/>.

08/2025