

COOKIES AND PRIVACY POLICY

As the operators of the CBS International GmbH website www.cw-cbs.at ("**Website**") CBS International GmbH, registered in Austria under the Company Registration Number FN 611115 z, and having its registered office address at Schreyvogelgasse 2/1. OG, 1010 Vienna, Austria ("**We**", "**Us**", "**CBS**"), is dedicated to safeguarding and upholding your privacy with utmost care and diligence. This Cookies and Privacy Policy ("**Policy**") relates to services and information provided through our Website and services that are offered via the Website ("**Services**") and sets out the basis on which the Personal Data collected from you, or that you provide to Us will be processed by Us. "**Personal Data**" means any information that identifies or relates to a particular individual and includes information referred to as "personally identifiable information" or "personal information" under applicable data privacy laws, rules, or regulations (collectively the "**Data Protection Laws**"). This Policy does not cover the practices of companies We don't own or control or people We don't manage. For clarity, this Policy applies when CBS acts as a "**Controller**" (as defined in the General Data Protection Regulation (the "**GDPR**")). Note that we may also process Personal Data of our potential job applicants in connection with the posting of a job offer/s on our Website, in which case we are the Controllers of Personal Data. Please read carefully the following information to understand our views and procedures concerning your Personal Data and how We will treat it.

For the purpose of the GDPR:

- in respect of the Personal Data of visitors of the Website and users of the Services, business contacts and prospects of CBS, the Data Controller is CBS.

Sources of Personal Data

We collect Personal Data about you from the following sources:

- You:
 - when you provide such information directly to us, and
 - when Personal Data about you is automatically collected in connection with your use of our Website.
- Our subsidiaries and affiliates (together "**Affiliates**") when they provide Us with Personal Data about you.
- Third parties, when they provide Us with Personal Data about you ("**Third Parties**"). Third Parties that share your Personal Data with Us include:
 - Service providers. For example, We may use analytics service providers to analyze how you interact and engage with the Website, or third parties may help Us provide you with customer support.
 - Other websites connected to the Website. If you sign in to the Website through a third-party site or service, you understand some content and/or information in those accounts may be transmitted into your interaction with our Website.
 - Advertising partners. We receive information about you from some of our service providers who assist Us with marketing or promotional services related to how you

interact with our Website, applications, products, services, advertisements or communications.

Information we collect from you

We collect and process some or all of the following types of information from you:

- Information that you provide by filling in forms on the Website. This includes information provided at the time of access and/or registration to use the Website (if applicable), subscribing to our Services and or newsletters, posting material or requesting further information or services. We may also ask you for information when you report a problem with the Website.
- If you contact Us, We may keep a record of that correspondence.
- We may also ask you to complete surveys that We use for research purposes, although you do not have to respond to them.
- Details of all actions that you carry out through the Website and of the provision of services to you.
- Details of your visits to the Website including, but not limited to, traffic data, location data, weblogs and other communication data, the site that referred you to our Website and the resources that you access.

The provision of your full name and email address, your employer and/or your place of work and the URL of the business that you work for is required from you when you register to use our Services (for newsletters marketing and promotional materials etc.). We will inform you at the point of collecting information from you, whether you are required to provide the information to Us.

Categories of Personal Data We Collect

The following chart details the categories of Personal Data that we collect and have collected over the past twelve (12) months. Throughout this Privacy Policy, we will refer to the categories of Personal Data listed in this chart (for example, "Category A. Personal identifiers").

| Personal Data Collected (including Categories) | Purposes of Use | What is the source of this Personal Data? | Categories of third parties to whom we disclose the information for business purposes |
|---|--|--|---|
| A. Personal identifiers Real name, postal address, unique personal identifier, | <ul style="list-style-type: none">• Provide the Services• Create your Account on the Website• Communicate with you and | You Affiliates Third Parties | <ul style="list-style-type: none">• Service Providers• Our Affiliates• Other Individuals, Services, and |

| | | | |
|---|--|---|--|
| <p>online identifier, Internet Protocol (IP) address, email address, account name, telephone number, social profile URL</p> | <p>provide customer service</p> <ul style="list-style-type: none"> • Personalize your experience • Send you newsletters, or other marketing communications • Improve the Services and/or Website • Our Marketing and Third Party Marketing and Advertising Purposes • Bug detection and error reporting • Auditing Consumer Interactions • Security, Fraud and Legal Compliance | | <p>Partners at your Request</p> <ul style="list-style-type: none"> • Entities for Legal Purposes • Employers |
| <p>B. Internet or other similar network activity information</p> <p>Browsing history, search history, information interaction with the Website.</p> | <ul style="list-style-type: none"> • Our Marketing and Third-Party Marketing and Advertising Purposes • Auditing Consumer Interactions • Communicate with you and provide customer service • Improve the Services and/or Website | <p>You</p> <p>Affiliates</p> <p>Third Parties</p> | <ul style="list-style-type: none"> • Service Providers • Our Affiliates |

| | | | |
|--|---|--|---|
| | <ul style="list-style-type: none"> • Bug detection and error reporting • Security, Fraud and Legal Compliance | | |
| C. Geolocation data Physical location (calculated from IP address) | <ul style="list-style-type: none"> • Provide the Services • Security, Fraud and Legal Compliance | You Affiliates Third Parties | <ul style="list-style-type: none"> • Service Providers • Our Affiliates |
| D. Job applicants information Employment and educational history, professional certifications and affiliations, and any other information included in CV-s/resumés, online professional profiles, information about criminal offense, conviction, pending investigations and administrative sanctions You can learn more about this in our separate candidate privacy notice. — <i>"Privacy Notice Staff-Related Personel Data"</i> | <ul style="list-style-type: none"> • Provide the Services • Carrying out the recruitment procedure • Communication with you regarding the recruitment process and recruitment requirements • Security, Fraud and Legal Compliance | You Affiliates Third Parties | <ul style="list-style-type: none"> • Service Providers • Our Affiliates • Other Individuals, Services, and Partners at your Request • HR and headhunting agencies • Entities for Legal Purposes • Employers |

The following section provides additional information about how we collect your Personal Data.

Lawful Basis for Processing

Under the GDPR the lawful bases we rely on for processing of your personal data could be:

Legitimate Interest: We may process your personal data based on our legitimate interest, which includes without limitation our legitimate interest to provide and improve the Services, our legitimate interest to improve the Website, our legitimate interest to assist Job applicants find employment within CBS (via the listed job openings on our Website), our legitimate interest in advertising our product and services, unless you have provided your prior consent as required.

Contract: We may process Personal Data, for Us to provide the services and meet our contractual obligations towards you, when We have a contract with you.

Consent: On a few occasions, We may rely on your consent for the processing of your Personal Data. In any such case, we will indicate this and ask for your specific informed consent, e.g. when you sign up to receive marketing communications etc.

Legal Obligation: We may process your Personal Data to comply with a legal or regulatory obligation such as e.g. detecting, preventing or investigating crime or fraud including working with law enforcement agencies.

Your Rights

Subject to local data protection laws (namely The Austrian data protection act (Datenschutzgesetz, short DSG)) and in particular under the General Data Protection Regulation (GDPR), you have a number of important rights free of charge. In summary, those include rights to:

- access to your Personal Data and to certain other supplementary information that this Policy is already designed to address;
- require Us to correct any mistakes in your information which We hold;
- require the erasure of Personal Data concerning you in certain situations;
- receive the Personal Data concerning you which you have provided to Us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations;
- object at any time to processing of Personal Data concerning you for direct marketing;
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you;
- object in certain other situations to our continued processing of your Personal Data;
- otherwise restrict our processing of your Personal Data in certain circumstances; and
- claim compensation for damages caused by our breach of any data protection laws.

For further information on data protection and each of those rights, including the circumstances in which they apply, please see the website of the Austrian Data Protection Authority at:
<http://www.dsb.gv.at/>.

If you would like to exercise any of those rights, please:

- contact Us using our Contact details below;
- let Us have enough information to identify you;
- let Us have proof of your identity and address. Where you are a user of our Services (by subscription to newsletters, promotional and other marketing submissions) you should email Us from the email address that you used to register with CBS. Receipt of an email from this address will usually be sufficient to confirm your identity. In all other cases we may request one or more identification documents, such as a copy of your ID or passport; and
- let Us know the information to which your request relates.

For clarity, the above rights apply to EU data subjects, as required under applicable law, but also any other user of the Website and the Services, regardless of location may exercise any of these rights.

Uses made of your information

Where you are using Our Services on behalf of our client, we rely on legitimate interests in performing our contract with our client as the lawful basis on which We collect and use your Personal Data.

We use information held about you in the following ways:

- To ensure that content from the Website is presented in the most effective manner for you and for your computer.
- To provide you with information, products or services that you request from Us or which we feel may interest you.
- To notify you about changes to our Services and provide you with information that is relevant to your use of the Services.
- Where you are a prospective client, to provide you with information about our Services for marketing purposes.

Aggregate Data

We may use anonymized and/or aggregate data collected through your use of the Website for statistical purposes, for improvement of the Services, to conduct research, or any other lawful purpose. Aggregate Data is not considered personal data.

Disclosure of your information

We may disclose your personal information to any member of the CBS Group if considered justified, which means our subsidiaries, our shareholders, ultimate ownership company and their affiliate

companies and subsidiaries. Where any such member of the CBS Group is outside the EU this transfer will be on the basis of a contract, as described below in accordance with the Data Protection Laws.

We may disclose your personal information to third parties:

- if we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation or in order to enforce or apply our Website Terms and Conditions and other agreements, but we will endeavor to minimize such disclosure to only that reasonably necessary and, where possible, to provide you with notice of such disclosure; and/or
- to protect the rights, property, or safety of CBS, the Website, our users and any third party we interact with to provide the Website.

We disclose your Personal Data to service providers and other parties for the following business purposes:

- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- Debugging to identify and repair errors that impair existing intended functionality.
- Performing services on our behalf, including software hosting and cloud computing, Website Management, email sending, logging, storing client data, maintaining or servicing accounts, providing customer service, processing or fulfilling orders, verifying customer information, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.
- Undertaking internal research for technological development and demonstration.
- Undertaking activities to verify or maintain the quality or safety of a service or functionality that we provide, own, manufacture, or control.

We disclose your Personal Data to the following categories of service providers and other parties:

- Service providers, including:
 - Ad networks.
 - Security and fraud prevention consultants.
 - Hosting and other technology and communications providers.
 - Analytics providers.
 - Email sending providers.
 - Customer service software providers.
- Our Affiliates.
- Parties who acquire your Personal Data through an acquisition or other change of control.
 - Personal Data may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part).
- Other parties at your direction.
 - Other users (where you post information publicly or as otherwise necessary to effect a transaction initiated or authorized by you through the Services).

- Social media services (if you intentionally interact with them through your use of the Services).
- Other parties authorized by you.

How we store your Personal Data

Security

We take appropriate measures to ensure that all Personal Data is kept secure including security measures to prevent Personal Data from being accidentally lost, or used or accessed in an unauthorized way, for the duration of your use of our Website and Services. We limit access to your Personal Data to those who have a genuine business need to know it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where We are legally required to do so.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Data, we cannot guarantee the security of your data transmitted to the Website, therefore any transmission remains at your own risk. Once we have received your information, we will use strict procedures and security features to prevent unauthorized access.

Keeping your Personal Data up to date

If your personal details change you may update them by accessing the relevant page of the Website, or by contacting Us at office@cw-cbs.at.

We will endeavor to update your Personal Data within thirty (30) days of any new or updated Personal Data being provided to Us, in order to ensure that the Personal Data We hold about you is as accurate and up to date as possible.

Where we store your Personal Data

The data that We collect from you and process as a result of your use of the Website may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for Us or for one of our suppliers. Such staff may be engaged in, among other things, the provision of support services. By submitting your Personal Data, you agree to this transfer, storing or processing.

In particular, your data may be accessible to i) CBS's staff in the Republic of Croatia and Republic of Serbia or ii) may be stored by CBS's hosting service provider on servers in the Republic of Serbia. A Data Processing and Transfer Agreement has been signed between the entities of the CBS Group of

Companies, and between CBS and each of its data processors. These Data Processor Agreements are designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your Personal Data.

If you would like further information, please contact Us (see 'Contact' below). We will not otherwise transfer your Personal Data outside of the EEA or to any organization (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

How long we keep your Personal Data

We pledge to keep your Personal Data only for the duration required for the intended purpose of its collection, and within the boundaries set by relevant regulations. We undertake measures to ensure that once your personal information serves its purpose, we either eliminate it from our databases and records or render it anonymous, preventing any further identification (except in cases where legal or regulatory obligations necessitate its retention).

Third Party Websites

The Website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and terms of use and that we do not accept any responsibility or liability for these policies and terms of use. Please check these policies before you submit any Personal Data to these websites.

Cookie Notice – Automatic Data Collection

We use cookies and similar technologies on our Website and our cookie preference center allows you to restrict our use of cookies other than Required Cookies.

1. What is a Cookie

A cookie is a small text file that a website stores on your personal computer, telephone, or any other device, with information about your navigation on that website. Cookies serve various purposes such as allowing you to navigate between pages efficiently, remembering your preferences, analyzing the use of our Website, generally improving the user experience, and ensuring that the advertisements you see online are more relevant to you and your interests. A cookie contains the name of the server it came from, the expiry of the cookie, a value – usually a randomly generated unique number as well as other data relating to your use of our Website. Depending on the applicable data protection law such information and data may qualify as personal information.

2. Cookies Used by Us

a) How We Use Cookies

We use session cookies, which are temporary cookies that are erased from your device's memory when you close your Internet browser or turn your computer off, and persistent cookies, which are stored on your device until they expire, unless you delete them before that time. We group cookies on our Website into three categories.

Required cookies: These cookies are necessary to enable the basic features of this Website to function, such as identifying you as a valid user, ensuring that no one else can sign on simultaneously with your account from another computer and helping us serve you better based on your registration preferences. These cookies may also be used to remember and honor your cookie preferences via our cookie preference center.

Functional cookies: These cookies allow us to analyze your use of the Website to evaluate and improve our performance. They may also be used to provide a better customer experience on this Website. For example, providing us information about how our Website is used and helping us facilitate any promotions or surveys that we provide.

Advertising cookies: These cookies may be used to share data with advertisers so that the ads you see on our Website or on third party websites are more relevant to you, allow you to share certain pages with social networks, or allow you to post comments on our Website.

b) Type of Cookies We Use

Details on the cookies used on our Site are provided in the cookie preference center available via the link "Cookie Preferences" on the button of our Website. Please click on "Detailed Settings" in the sections on functional cookies and advertising cookies.

3. Consent Requirements

Depending on the applicable data protection law, we may only place and use functional cookies and advertising cookies if you have given your consent via our cookie banner. Our cookie preference center on our Website allows you to make further choices and/or withdraw a consent regarding our use of cookies (with the exception of Required Cookies).

4. Performance Tracking via Similar Tracking Technologies

We sometimes use performance tracking technologies, such as web beacons, pixel and tags, within our marketing emails or within advertisements displayed on our Website or third-party websites. These performance tracking technologies may be provided by Us or by third parties and they help Us to track whether an email recipient has clicked on advertisement for example. Further information on the performance tracking technologies used in our marketing emails and on our Website or third-party websites are available via the link "Cookie Preferences" on the button of our Website. Please click on "Detailed Settings" in the sections on functional cookies and advertising cookies.

5. Managing Your Cookie Preferences

a) Cookie Preference Center

Our cookie preference center on our Website allows you to make choices regarding our use of cookies (with the exception of Required Cookies). If you use our cookie preference center on a mobile device, we process your device's advertising identifier to honor your choices via our cookie preference center. If you make choices in our cookie preference center for cookies (e.g., if you reject a certain cookie), persistent cookies will be set by the ad networks listed in our cookie preference center to honor your preferences.

If you clear your cookies in your browser settings, this will remove all cookies including the opt-out cookies set to honor your choices made in our cookie preference center. You will need to re-access the cookie preference center to reset your preferences. Additionally, if you are located in the EEA you will also be presented with the cookie banner on the Website to re-consent to cookies where required.

b) Do Not Track

We currently do not respond to "Do Not Track" signals from your browser. Our use of tracking technologies may instead be controlled through our cookie preference center.

c) Disabling and Preventing Further Use of Cookies

In addition to restricting cookies in our cookie preference center, you may restrict, block or delete the cookies from this Website at any time by changing the configuration of your browser. You can find out how to do this, and find more information on cookies, at <https://www.allaboutcookies.org>. In addition, while each browser has different settings and configurations, cookies settings can typically be adjusted in the "Preferences" or "Tools" menu of your browser. Your browser's "Help" menu may provide additional information. Note, however, that deleting or blocking Required Cookies will cause the Website to not function properly.

How to complain

We aim to address and resolve any questions or concerns you may have regarding Our use of your information.

The [General Data Protection Regulation](#) also gives you rights to lodge a complaint with a supervisory authority, in particular (under the GDPR) in the European Union (or EEA) state where you work, normally live or where any alleged infringement of data protection laws occurred.

The supervisory authority in Austria is the Austrian Data Protection Authority, which may be contacted at Call Centre: +43 1 52 152-0 or via e-mail: dsb@dsb.gv.at

Changes to the Policy

We reserve the right to modify this Policy at any time. Any changes we may make to our Policy in the future will be notified of and made available to you using the Website. Your continued use of the Website shall be deemed your acceptance of the varied Policy.

Contact

If you have any questions about this Policy or want to report a potential data breach, please reach out to Us at: office@cw-cbs.at.

Last updated on 15 May 2024.

You may print a copy of the previous version of Privacy Policy by clicking [here](#).