

Website Data Protection Policy

The following policy describes how GSK STOCKMANN Rechtsanwälte Steuerberater Partnerschaftsgesellschaft mbB, with registered office in Munich, Munich Local Court, No. 533 (hereinafter also referred to as “GSK STOCKMANN”, “we”, “us”) processes your (and possibly third parties’) personal data in connection with the website www.gsk.de (“website”).

We take the confidentiality and protection of your personal data very seriously. For this reason, we process your personal data exclusively insofar as this is legally admissible, in particular on the basis of the requirements of the EU General Data Protection Regulation (“GDPR”) and the German Federal Data Protection Act (“BDSG”).

The following provides an overview of what personal data we collect from you when using our website, how and for what purposes we use this data and what rights you are entitled to. Please note that the website may contain links to websites of other providers over which we have no control and to which this data protection policy does not apply.

1. Processing of your data

a) Visiting the website

aa) In principle, you can visit our website without providing us with any personal data. As is usual with most websites, our systems automatically record every access or retrieval of our website and store this temporarily in log files. The data stored in this context includes in particular:

- IP address of the requesting computer;
- name and URL of the accessed file;
- date and time of access;
- access status/HTTP status code;
- amount of data transferred in each case;
- identification data of the browser used.

bb) As a matter of principle, we cannot assign this data to a specific person. Personal user profiles are also not created – unless mentioned elsewhere in this data protection policy. The aforementioned processing of data takes place for the purpose of enabling the use of the website (establishing a connection; session control) and for internal system-related purposes (technical administration, system security). Data is stored in log files in order to ensure the functionality of



the website. In addition, this data is used to optimise the website and to ensure the security of our systems.

Insofar as the processing of data in connection with visiting the website involves personal data, the legal basis for this data processing is Art. 6 para. 1 sentence 1 lit. f) GDPR (legitimate interest). The legitimate interest is derived from the above-mentioned purposes.

b) Contact by e-mail

- aa) There are various ways of contacting us by e-mail on the website. If you contact us in this way or send us an enquiry, the personal data you provide will be processed by us in order to respond to your enquiry. This data is used by us exclusively for the purpose of processing the enquiry.
- bb) The legal basis for the processing of the aforementioned personal data is Art. 6 para. 1 sentence 1 lit. f) GDPR (legitimate interest). The legitimate interest is derived from the fact that we can only carry out the action desired by the user (e.g. responding to enquiries) by processing the user's data accordingly. If you are contacting us with the aim of potentially becoming a client of ours or entering into some other kind of business relationship or employment contract, a further, or alternative basis for processing is Art. 6 para. 1 sentence 1 lit. b) GDPR (performance of contract and pre-contractual measures).

c) Newsletter and other information by e-mail

- aa) On our website, you have the option of registering for our free newsletter and receiving other similar information by e-mail. If you have consented, we will send you our newsletter or similar information on a regular basis to the e-mail address that you provide to us for this purpose. The users' e-mail addresses are processed for the purpose of sending the requested e-mails. We will only store your e-mail address for this purpose until you unsubscribe from the newsletter or object to receiving similar information by e-mail.

For your registration to be effective, we require a valid e-mail address from you. In order to verify that you are the person who registered for the newsletter, we use a "double opt-in" procedure to obtain your consent. This means that you need to confirm your initial registration in a second step. For this purpose, you will receive an e-mail (confirmation e-mail) with a request for confirmation of the contact e-mail address provided.

You can revoke your consent to receive such messages at any time with effect for the future. Each newsletter contains an "Unsubscribe" link. You can also let us know that you wish to revoke your consent by using the contact option provided at the end of this data protection policy (see below under Section 5).



- bb) The legal basis for the processing of personal data to send out the newsletter and the other aforementioned data processing by us is Art. 6 para. 1 sentence 1 lit. a) GDPR (consent of the user).

d) Use of cookies

We use cookies on this website. Cookies are small text files that are stored in the memory of your browser.

When you access individual pages of the website, “technically necessary” cookies may be used to help navigate the website, support the use of basic functions and ensure the security of the website; these cookies do not collect information about you for marketing purposes nor do they store information on which webpages you have visited. The legal basis for the use of these technically necessary cookies is Art. 6 para. 1 sentence 1 lit. f) GDPR (legitimate interest; the legitimate interest is based on the above-mentioned purposes, in particular session control and ensuring website security).

If and to the extent that we also use other non-technically necessary cookies in relation to your visit to the website, then we will always obtain your consent in advance (via a consent management tool) regarding such cookies on the website. Unless you give your consent, such cookies will not be used when you visit the website. The legal basis for the personal data processing associated with such cookies is Art. 6 para. 1 sentence 1 lit. a) GDPR (consent).

Most standard browsers can be configured so that no cookies are stored. However, fully deactivating cookies may mean that you will be unable to make (full or uninterrupted) use of all the functions of our website.

e) Google

aa) Google Analytics

The website uses Google Analytics (including the Google Optimize and Google Universal Analytics functions), a web analytics service provided by Google. If you do not consent to the use of this tool when (first) accessing the website, none of your personal data will be processed using this tool. This service enables us to evaluate the use of our website and collect information about the needs of users in order to improve the quality and user-friendliness of our online presence. In order to be able to carry out these evaluations, predominantly aggregated and anonymous statistical data is collected. Google Analytics uses “cookies”, which are text files placed on your computer, to help the website analyse how users use the site.

The information generated by the cookie about your use of the website is generally transmitted to a Google server in the USA and stored there. However, as this website uses IP anonymisation,



your IP address will be truncated beforehand by Google within Member States of the European Union or in other EEA signatory states. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and truncated there. On behalf of this website's operator, Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity and providing other services relating to website use and internet usage to the website operator. The IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data.

You can prevent such cookies from being stored by changing the settings in your browser software or by deactivating the use of Google Analytics for our website with regard to your personal data in the consent management tool on our website (you can access the consent management tool for the website at the bottom of the data protection website (www.gsk.de/en/privacy) under "Privacy settings" and change the settings there). However, we would like to point out that if you do this you may not be able to use all the functions of the website to their full extent. You can also prevent the data generated by the cookie and related to your use of the website (including your IP address) being collected and processed by Google by downloading and installing the browser plugin available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=en> .

You can find more information about Google Analytics here:

<https://www.google.com/analytics/terms/default.html>

<http://www.google.com/intl/analytics/learn/privacy.html>

<https://policies.google.com/privacy?hl=en-US>

The legal basis for the processing of personal data described above is Art. 6 para. 1 sentence 1 lit. a) GDPR (in conjunction with Sec. 25 para. 1 of the German Telecommunications and Telemedia Data Protection Act ("TTDSG")); consent).

bb) Google Maps

On this website, we use "Google Maps" from Google. If you do not consent to the use of this tool when (first) accessing the website, none of your personal data will be processed with the help of or in connection with this tool. Every time "Google Maps" is accessed, a cookie is set by Google in order to process user settings and data when displaying the page in which "Google Maps" is integrated for the purpose of ensuring the functionality and improvement of the Maps functions by Google. As a rule, this cookie is not deleted by closing the browser, but expires after a certain period of time, unless you manually delete it beforehand. If you do not consent to your data being processed in this way, you have the option of deactivating the Google Maps service and thus preventing the transfer of data to Google. To do this, you can deactivate the Java Script function in your browser. You can also deactivate the use of Google Maps on our website with regard to



your personal data in the consent management tool on our website. However, we would like to point out that you will not be able to use Google Maps, or use may be restricted, if you deactivate this function.

For more information on the purpose and scope of data collection and processing by Google, please refer to the relevant Google privacy policy. There you will also find further information on your rights in this regard and setting options for protecting your privacy: <https://policies.google.com/privacy>.

The legal bases for the aforementioned processing of your personal data are Art. 6 para. 1) sentence 1 lit. a) GDPR and Sec. 25 para. 1 TTDSG (consent).

cc) Google Tag Manager

The website uses the Google Tag Manager from Google regarding the use of the website by users – provided users have given their consent. The Google Tag Manager is a solution that allows marketers to manage website tags via an interface. The tool itself (which implements the tags) essentially does not collect any personal data (except for in some cases the user's IP address). The tool is used for the purpose of triggering other tags, which in turn may process personal data. This kind of data processing can be prevented by deactivating this function at domain or cookie level (or via our consent management tool). The legal basis for the processing of personal data by Google Tag Manager directly as described above is Art. 6 para. 1 sentence 1 lit. a) GDPR (consent). Data may also be processed by Google in the USA.

dd) Google Ads (incl. conversion tracking)

We use the Google Ads service (incl. conversion tracking) from Google to draw attention to our attractive range of services on external websites with the help of advertisements (Google Ads). We can determine how successful the individual advertising measures are in relation to the data of the advertising campaigns. We do this in the interest of showing you advertisements that are of interest to you in order to make our website more interesting for you and to be able to fairly calculate our advertising costs.

These advertisements are delivered by Google via "ad servers". For this purpose, we use ad server cookies, which can be used to measure certain success parameters, such as the display of ads or clicks by users. If you access our website via a Google ad, Google Ads will store a cookie on your PC. These cookies usually expire after 30 days and are not intended to identify you personally. The unique cookie ID, number of ad impressions per placement (frequency), last impression (relevant for post-view conversions) and opt-out information (indication that the user no longer wishes to be targeted) are usually stored as analysis values for this cookie.



These cookies enable Google to recognise your internet browser. If a user visits certain pages of an Ads customer's website and the cookie stored on their computer has not yet expired, Google and the customer can see that the user has clicked on the ad and been redirected to that page. A different cookie is assigned to each Ads customer. Cookies can therefore not be tracked across Ads customers' websites. As a matter of principle, we ourselves do not collect or process any personal data in connection with the aforementioned advertising measures. Google only provides us with statistical evaluations, which we use to identify which of our advertising measures are particularly effective. We do not receive any further data from the use of the advertisements; in particular, we cannot identify users on the basis of this information.

Due to the marketing tools used, your browser automatically establishes a direct connection with the Google server. We have no influence on the scope and further use of the data collected by Google through the use of this tool and therefore inform you according to the best of our knowledge as follows: Through the integration of ads, Google receives the information that you have accessed the corresponding part of our website or clicked on an ad from us. If you are registered with a Google service, Google can assign the visit to your account. Even if you are not registered with Google or have not logged in, it is possible that the provider may obtain and store your IP address.

You can opt out of this process in various ways: a) by adjusting your browser software accordingly – in particular disabling third-party cookies will result in you not receiving ads from third-party providers; b) by deactivating the interest-based ads of the providers that are part of the self-regulation campaign "About Ads" via the link <http://www.aboutads.info/choices>, though this setting will be deleted when you delete your cookies; c) by permanently deactivating them in the browsers Firefox, Internet Explorer or Google Chrome under the link <http://www.google.com/settings/ads/plugin>. We would like to point out that in this case you may not be able to use all functions of this service to their full extent.

The legal basis for the aforementioned processing of data by us (insofar as personal data is processed by us at all in this context) is Art. 6 para. 1 sentence 1 lit. a) GDPR (in conjunction with Sec. 25 para. 1 TTDSG; consent).

ee) YouTube

On this website, we may integrate YouTube videos from Google's online video platform "YouTube", which are stored on YouTube servers and can be played directly from our website. If you do not consent to the use of this tool when (first) accessing the website, none of your personal data will be processed using this tool.

The videos are integrated in "privacy-enhanced mode", which means that personal data about you as a user is only transmitted to YouTube when you play the videos. We have no influence over the transmission of this data. Data is transferred regardless of whether you are logged in via



a user account provided by YouTube or no such account exists. If you are logged in to Google at the same time, your data will be assigned directly to your account. If you do not wish the data to be associated with your YouTube profile, you must log out before activating the plugin. YouTube stores your data as usage profiles and uses them for the purposes of advertising, market research and/or tailoring its website to users' needs. Such analysis is carried out in particular (even for users who are not logged in) for the purpose of providing targeted advertising and informing other users of the social network about your activities on our website.

You can also deactivate the use of YouTube on our website with regard to your personal data in the consent management tool on our website.

In connection with the processing of data described above, processing may also take place in the USA (see below under ff).

The legal basis for the aforementioned processing of data by us (insofar as personal data is processed by us at all in this context) is Art. 6 para. 1 sentence 1 lit. a) GDPR, the consent of the user.

ff) Further information on Google

The responsible service provider of the aforementioned Google services is Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland).

Data may be processed by Google also in the USA (cf. already above). There is currently a (restricted) adequacy decision from the European Commission in place regarding data protection in the USA; Google LLC has obtained certification in accordance with this decision. In addition, standard data protection clauses within the meaning of Article 46 (2) (c) GDPR will be used (by Google) (Google can provide you with the corresponding documentation on the standard data protection clauses).

See also <https://www.google.com/intl/en/policies/privacy>.

f) Applicant site career.gsk.de

If you contact us via our careers site (career.gsk.de), e.g. to apply for a position with us, we will use the data and documents you provide for the purpose of communicating with you or for the application process (interviews, etc.). The personal data that you provide to us in this context will not be used beyond this scope, unless you expressly consent to this and subject to the other statements in this data protection policy. The legal basis for the aforementioned processing of personal data is Art. 6 para. 1 sentence 1 lit. b) GDPR (performance of contract or precontractual measures).



2. Disclosure of data to third parties

Personal data collected from you while using the website will not be disclosed or otherwise transferred to third parties without your consent, except in other cases expressly described in this data protection policy.

Exceptions to this are transfers of personal data in cases where there is a legal obligation to disclose (for example to state institutions and authorities), insofar as we are legally obliged to do so. The legal basis for this processing of your personal data is Art. 6 para. 1 sentence 1 lit. c) GDPR (fulfilment of a legal obligation).

For the operation of the website and the services offered on the website (for example, hosting the website or sending the newsletter), we may use external service providers who process your personal data on our behalf. These service providers process the data exclusively in accordance with our instructions. The legal basis for such data processing is Art. 28 GDPR (commissioned data processing).

3. Duration of the retention of your personal data

Insofar as the other provisions of this data protection policy do not specify any other storage period, we will only store your personal data that we obtain in connection with your use of the website for as long as this is necessary to fulfil the corresponding processing purpose (e.g. to process your requests or enquiries to us) and thereafter only to the extent and insofar as we are obliged to do so in accordance with the statutory storage obligations. If we no longer require your data for the purposes described above, then it will only be stored for the respective statutory retention period and will not be processed for other purposes.

4. Your rights

You have the right to request information from us at any time about the personal data we hold about you. Insofar as the legal requirements are met, you also have the right to demand that we correct, delete or restrict the processing of the relevant data, the right to object to the processing of your data by us and the right to receive the personal data relating to you from us in a structured, commonly used and machine-readable format. If you have given your consent to the use of your personal data, you can revoke this consent at any time.

If you believe that our processing of personal data concerning you violates applicable data protection law, then you may lodge a complaint with a competent data protection supervisory authority.



5. Contact

If you have any questions on the subject of data protection (including the assertion of your rights in accordance with Section 4), you can contact us at GSK STOCKMANN, Mohrenstr. 42, 10117 Berlin and via berlin@gsk.de, telephone: +49 30 203907-0, fax: +49 30 203907-44. You can also contact our Data Protection Officer directly at any time via the contact details for GSK STOCKMANN provided above as well as at christian.szidzek@thales-datenschutz.de.

6. Data security

GSK maintains up-to-date technical measures to ensure data security, in particular to protect your personal data from risks during data transmission and against third-party access. These are adapted to the current state of the art.

7. Amendments to the data protection policy

It may be necessary to amend this data protection policy from time to time, for example due to further enhancements to our website or legal changes. We therefore reserve the right to amend the data protection policy at any time with effect for the future. We therefore recommend that you reread this data protection policy at regular intervals.

Version dated: January 2024

