

Privacy Policy

Preamble

With the following privacy policy we would like to inform you which types of your personal data (hereinafter also abbreviated as “data”) we process for which purposes and in which scope. The privacy statement applies to all processing of personal data carried out by us, both in the context of providing our services and in particular on our websites, in mobile applications and within external online presences, such as our social media profiles (hereinafter collectively referred to as “online services”).

The terms used are not gender-specific.

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Controller

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Legal Notice: <https://www.mpcnet.de/impressum/>

Contact information of the data protection officer

datenschutz@mpcnet.de

Overview of processing operations

The following table summarises the types of data processed, the purposes for which they are processed and the concerned data subjects.

Categories of Processed Data

- Inventory data (e.g. names, addresses).
- Job applicant details (e.g. Personal data, postal and contact addresses and the documents pertaining to the application and the information contained therein, such as cover letter, curriculum vitae, certificates, etc., as well as other information on the person or qualifications of applicants provided with regard to a specific job or voluntarily by applicants).
- Content data (e.g. text input, photographs, videos).
- Contact data (e.g. e-mail, telephone numbers).
- Meta/communication data (e.g. device information, IP addresses).
- Usage data (e.g. websites visited, interest in content, access times).
- Contract data (e.g. contract object, duration, customer category).
- Payment Data (e.g. bank details, invoices, payment history).

Categories of Data Subjects

- Job applicants.
- Business and contractual partners.
- Prospective customers.
- Communication partner (Recipients of e-mails, letters, etc.).
- Customers.
- Users (e.g. website visitors, users of online services).

Purposes of Processing

- Job Application Process (Establishment and possible later execution as well as possible later termination of the employment relationship).
- Office and organisational procedures.
- Contact requests and communication.
- Provision of contractual services and customer support.
- Managing and responding to inquiries.

Legal Bases for the Processing

In the following we inform you about the legal basis of the General Data Protection Regulation (GDPR), on the basis of which we process personal data. Please note that, in addition to the regulations of the GDPR, the national data protection regulations may apply in your country or in our country of residence or domicile. If, in addition, more specific legal bases are applicable in individual cases, we will inform you of these in the data protection declaration.

- **Consent (Article 6 (1) (a) GDPR)** - The data subject has given consent to the processing of his or her personal data for one or more specific purposes.
- **Performance of a contract and prior requests (Article 6 (1) (b) GDPR)** - Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- **Compliance with a legal obligation (Article 6 (1) (c) GDPR)** - Processing is necessary for compliance with a legal obligation to which the controller is subject.
- **Legitimate Interests (Article 6 (1) (f) GDPR)** - Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.
- **Job application process as a pre-contractual or contractual relationship (Article 9 (2)(b) GDPR)** - If special categories of personal data within the meaning of Article 9 (1) GDPR (e.g. health data, such as severely handicapped status or ethnic origin) are requested from applicants within the framework of the application procedure, so that the responsible person or the person concerned can carry out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law, their processing shall be carried out in accordance with Article 9 (2)(b) GDPR, in the case of the protection of vital interests of applicants or other persons on the basis of Article 9 (2)(c) GDPR or for the purposes of preventive health care or occupational medicine, for the assessment of the employee's ability to work, for medical diagnostics, care or treatment in the health or social sector or for the administration of systems and services in the health or social sector in accordance with Article 9 (2)(d) GDPR. In the case of a communication of special categories of data based on voluntary consent, their processing is carried out on the basis of Article 9 (2)(a) GDPR.

National data protection regulations in Germany - In addition to the data protection regulations of the General Data Protection Regulation, national regulations apply to data protection in Germany. This includes in particular the Law on Protection against Misuse of Personal Data in Data Processing (Federal Data Protection Act - BDSG). In particular, the BDSG contains special provisions on the right to access, the right to erase, the right to object, the processing of special categories of personal data, processing for other purposes and transmission as well as automated individual decision-making, including profiling. Furthermore, it regulates data processing for the purposes of the employment relationship (§ 26 BDSG), in particular with regard to the establishment, execution or termination of employment relationships as well as the consent of employees. Furthermore, data protection laws of the individual federal states may apply.

Security Precautions

We take appropriate technical and organisational measures in accordance with the legal requirements, taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, in order to ensure a level of security appropriate to the risk.

The measures include, in particular, safeguarding the confidentiality, integrity and availability of data by controlling physical and electronic access to the data as well as access to, input, transmission, securing and separation of the data. In addition, we have established procedures to ensure that data subjects' rights are respected, that data is erased, and that we are prepared to respond to data threats rapidly. Furthermore, we take the protection of personal data into account as early as the development or selection of hardware, software and service providers, in accordance with the principle of privacy by design and privacy by default.

SSL encryption (https) - In order to protect your data transmitted via our online services in the best possible way, we use SSL encryption. You can recognize such encrypted connections by the prefix <https://> in the address bar of your browser.

Data Processing in Third Countries

If we process data in a third country (i.e. outside the European Union (EU), the European Economic Area (EEA)) or the processing takes place in the context of the use of third party services or disclosure or transfer of data to other persons, bodies or companies, this will only take place in accordance with the legal requirements.

Subject to express consent or transfer required by contract or law, we process or have processed the data only in third countries with a recognised level of data protection, on the basis of special guarantees, such as a contractual obligation through so-called standard protection clauses of the EU Commission or if certifications or binding internal data protection regulations justify the processing (Article 44 to 49 GDPR, information page of the EU Commission: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection_en).

Commercial Services

We process data of our contractual and business partners, e.g. customers and interested parties (collectively referred to as “contractual partners”) within the context of contractual and comparable legal relationships as well as associated actions and communication with the contractual partners or pre-contractually, e.g. to answer inquiries.

We process this data in order to fulfil our contractual obligations, safeguard our rights and for the purposes of the administrative tasks associated with this data and the business-related organisation. We will only pass on the data of the contractual partners within the scope of the applicable law to third parties insofar as this is necessary for the aforementioned purposes or for the fulfilment of legal obligations or with the consent of data subjects concerned (e.g. telecommunications, transport and other auxiliary services as well as subcontractors, banks, tax and legal advisors, payment service providers or tax authorities). The contractual partners will be informed about further processing, e.g. for marketing purposes, as part of this privacy policy.

Which data are necessary for the aforementioned purposes, we inform the contracting partners before or in the context of the data collection, e.g. in online forms by special marking (e.g. colors), and/or symbols (e.g. asterisks or the like), or personally.

We delete the data after expiry of statutory warranty and comparable obligations, i.e. in principle after expiry of 4 years, unless the data is stored in a customer account or must be kept for legal reasons of archiving (e.g., as a rule 10 years for tax purposes). In the case of data disclosed to us by the contractual partner within the context of an assignment, we delete the data in accordance with the specifications of the assignment, in general after the end of the assignment.

If we use third-party providers or platforms to provide our services, the terms and conditions and privacy policies of the respective third-party providers or platforms shall apply in the relationship between the users and the providers.

Agency Services - We process the data of our customers within the scope of our contractual services, which may include e.g. conceptual and strategic consulting, campaign planning, software and design development / consulting or maintenance, implementation of campaigns and processes, handling, server administration, data analysis / consulting services and training services.

Project and Development Services - We process the data of our customers and clients (hereinafter uniformly referred to as “customers”) in order to enable them to select, acquire or commission the selected services or works as well as associated activities and to pay for and make available such services or works or to perform such services or works.

The required information is indicated as such within the framework of the conclusion of the agreement, order or equivalent contract and includes the information required for the provision of services and invoicing as well as contact information in order to be able to hold any consultations. Insofar as we gain access to the information of end customers, employees or other persons, we process it in accordance with the legal and contractual requirements.

Software and Platform Services - We process the data of our users, registered and any test users (hereinafter uniformly referred to as “users”) in order to provide them with our contractual services and on the basis of legitimate interests to ensure the security of our offer and to develop it further. The required details are identified as such within the context of the conclusion of the agreement, order or comparable contract and include the details required for the provision of services and invoicing as well as contact information in order to be able to hold any further consultations.

- **Processed data types** - Inventory data (e.g. names, addresses), Payment Data (e.g. bank details, invoices, payment history), Contact data (e.g. e-mail, telephone numbers), Contract data (e.g. contract object, duration, customer category).
- **Data subjects** - Prospective customers, Business and contractual partners.
- **Purposes of Processing** - Provision of contractual services and customer support, Contact requests and communication, Office and organisational procedures, Managing and responding to inquiries.
- **Legal Basis** - Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Compliance with a legal obligation (Article 6 (1) (c) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

Payment Service Provider

In addition to banks and credit institutions, we use other payment service providers on the basis of our interests in efficient and secure payment procedures, whose platforms users and we can use to perform payment transactions.

In addition to banks and credit institutions, we use other payment service providers on the basis of our interests in efficient and secure payment procedures, whose platforms users and we can use to perform payment transactions. The data processed by the payment service providers include inventory data, such as the name and address, bank details such as account numbers or credit card numbers, passwords, TANs and checksums as well as contract-, sum- and recipient-related information. The information is required to carry out the transactions. However, the data entered will only be processed and stored by the payment service providers. This means that we do not receive any account or credit card-related information, but only information with confirmation or negative information about the payment. Under certain circumstances, the data will be transmitted to credit agencies by the payment service provider. The purpose of this transmission is to check your identity and creditworthiness. We refer to the terms and conditions and the data protection information of the payment service providers.

The terms and conditions and data protection notices of the respective payment service providers, which can be called up within the respective websites or transaction applications, apply to payment transactions. We refer to these for the purpose of further information and assertion of rights of revocation and information as well as other data subjects rights.

- **Processed data types** - Inventory data (e.g. names, addresses), Payment Data (e.g. bank details, invoices, payment history), Contract data (e.g. contract object, duration, customer category), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects** - Customers, Prospective customers.
- **Purposes of Processing** - Provision of contractual services and customer support.
- **Legal Basis** - Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

Services and service providers being used

- **PayPal** - Payment service provider (e.g. PayPal, PayPal Plus, Braintree, Braintree); Service provider: PayPal (Europe) S.à r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg; Website: <https://www.paypal.com>; Privacy Policy: <https://www.paypal.com/de/webapps/mpp/ua/privacy-full>.

Contacting us

When contacting us (e.g. by contact form, e-mail, telephone or via social media), the data of the inquiring persons are processed insofar as this is necessary to answer the contact enquiries and any requested activities.

The response to contact enquiries within the framework of contractual or pre-contractual relationships is made in order to fulfil our contractual obligations or to respond to (pre)contractual enquiries and otherwise on the basis of the legitimate interests in responding to the enquiries.

- **Processed data types** - Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Content data (e.g. text input, photographs, videos).
- **Data subjects** - Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of Processing** - Contact requests and communication.
- **Legal Basis** - Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

Video Conferences, Online Meetings, Webinars and Screen-Sharing

We use third-party platforms and applications (hereinafter referred to as “third party providers”) for the purposes of conducting video and audio conferences, webinars and other types of video and audio meetings. When selecting third-party providers and their services, we observe the legal requirements.

In this context, data of the communication participants will be processed and stored on the servers of third parties, as far as these are part of communication processes with us. This data may include, but is not limited to, registration and contact details, visual and voice contributions, chat entries and shared screen content.

If users are referred to the third-party providers or their software or platforms in the context of communication, business or other relationships with us, the third-party provider processing may process usage data and metadata that can be processed by them for security purposes, service optimisation or marketing purposes. We therefore ask you to observe the data protection information of the respective third party providers.

Information on legal basis - If we ask the users for their consent to the use of third party providers or certain functions (e.g. permission to record conversations), the legal basis of the processing is consent. Furthermore, the processing can be a component of our (pre)contractual services, provided that the use of the third party was agreed within this context. Otherwise, user data will be processed on the basis of our legitimate interest in efficient and secure communication with our communication partners. In this context, we would also like to refer you to the information on the use of cookies in this privacy policy.

- **Processed data types** - Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Content data (e.g. text input, photographs, videos), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects** - Communication partner (Recipients of e-mails, letters, etc.), Users (e.g. website visitors, users of online services).
- **Purposes of Processing** - Provision of contractual services and customer support, Contact requests and communication, Office and organisational procedures.
- **Legal Basis** - Consent (Article 6 (1) (a) GDPR), Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

Services and service providers being used

- **Cisco WebEx** - Konferenz-Software; Service provider: Webex Communications Deutschland GmbH, Hansaallee 249, c/o Cisco Systems GmbH, 40549 Düsseldorf, parent company: Cisco Systems, Inc. 170 West Tasman Dr., San Jose, CA 95134, USA; Website: <https://www.webex.com>; Privacy Policy: <https://www.cisco.com/c/en/us/about/legal/privacy-full.html>.
- **GoToMeeting** - Konferenz-Software; Service provider: LogMeIn Ireland Limited, Bloodstone Building Block C 70, Sir John Rogerson's Quay Dublin 2, Ireland, parent company: LogMeIn, Inc., 320 Summer Street, Boston, MA 02210 320 Summer Street Boston, Massachusetts 02210, USA; Website: <https://www.gotomeeting.com/>; Privacy Policy: <https://www.logmeininc.com/legal/privacy>.
- **Microsoft Teams** - Messenger and conference software; Service provider: Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399 USA; Website: <https://products.office.com>; Privacy Policy: <https://privacy.microsoft.com/de-de/privacystatement>, Security information: <https://www.microsoft.com/de-de/trustcenter>.

Job Application Process

The application process requires applicants to provide us with the data necessary for their assessment and selection. The information required can be found in the job description or, in the case of online forms, in the information contained therein.

In principle, the required information includes personal information such as name, address, a contact option and proof of the qualifications required for a particular employment. Upon request, we will be happy to provide you with additional information.

If made available, applicants can submit their applications via an online form. The data will be transmitted to us encrypted according to the state of the art. Applicants can also send us their applications by e-mail. Please note, however, that e-mails on the Internet are generally not sent in encrypted form. As a rule, e-mails are encrypted during transport, but not on the servers from which they are sent and received. We can therefore accept no responsibility for the transmission path of the application between the sender and the reception on our server.

For the purposes of searching for applicants, submitting applications and selecting applicants, we may make use of the applicant management and recruitment software, platforms and services of third-party providers in compliance with legal requirements.

Applicants are welcome to contact us about how to submit their application or send it to us by regular mail.

Processing of special categories of data - If special categories of personal data within the meaning of Article 9 (1) GDPR (e.g. health data, such as severely handicapped status or ethnic origin) are requested from applicants within the framework of the application procedure, so that the responsible person or the person concerned can exercise his/her rights arising from labour law and social security and social protection law and fulfil his/her duties in this regard, their processing shall be carried out in accordance with Article 9 (1)(b) GDPR, in the case of the protection of vital interests of applicants or other persons pursuant to Article 9 (1)(c) GDPR or for the purposes of preventive health care or occupational medicine, for the assessment of the employee's ability to work, for medical diagnostics, care or treatment in the health or social sector or for the administration of systems and services in the health or social sector in accordance with Article 9 (1)(h) GDPR. In the case of a communication of special categories of data based on voluntary consent, their processing is carried out on the basis of Article 9 (1)(a) GDPR.

Ereasure of data - In the event of a successful application, the data provided by the applicants may be further processed by us for the purposes of the employment relationship. Otherwise, if the application for a job offer is not successful, the applicant's data will be deleted. Applicants' data will also be deleted if an application is withdrawn, to which applicants are entitled at any time. Subject to a justified revocation by the applicant, the deletion will take place at the latest after the expiry of a period of six months, so that we can answer any follow-up questions regarding the application and comply with our duty of proof under the regulations on equal treatment of applicants. Invoices for any reimbursement of travel expenses are archived in accordance with tax regulations.

Admission to a talent pool - Admission to an talent pool, if offered, is based on consent. Applicants are informed that their consent to be included in the talent pool is voluntary, has no influence on the current application process and that they can revoke their consent at any time for the future.

- **Processed data types** - Job applicant details (e.g. Personal data, postal and contact addresses and the documents pertaining to the application and the information contained therein, such as cover letter, curriculum vitae, certificates, etc., as well as other information on the person or qualifications of applicants provided with regard to a specific job or voluntarily by applicants).
- **Data subjects** - Job applicants.
- **Purposes of Processing** - Job Application Process (Establishment and possible later execution as well as possible later termination of the employment relationship).
- **Legal Basis** - Job application process as a pre-contractual or contractual relationship (Article 9 (2)(b) GDPR).

Planning, Organization and Utilities

We use services, platforms and software from other providers (hereinafter referred to as “ third-party providers”) for the purposes of organizing, administering, planning and providing our services. When selecting third-party providers and their services, we comply with the legal requirements.

Within this context, personal data may be processed and stored on the servers of third-party providers. This may include various data that we process in accordance with this privacy policy. This data may include in particular master data and contact data of users, data on processes, contracts, other processes and their contents.

If users are referred to the third-party providers or their software or platforms in the context of communication, business or other relationships with us, the third-party provider processing may process usage data and metadata that can be processed by them for security purposes, service optimisation or marketing purposes. We therefore ask you to read the data protection notices of the respective third party providers.

Information on legal basis - If we ask the users for their consent to the use of third party providers, the legal basis of the processing is consent. Furthermore, the processing can be a component of our (pre)contractual services, provided that the use of the third party was agreed within this context. Otherwise, user data will be processed on the basis of our legitimate interests (i.e. interest in efficient, economic and recipient friendly services). In this context, we would also like to refer you to the information on the use of cookies in this privacy policy.

- **Processed data types** - Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Content data (e.g. text input, photographs, videos), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects** - Communication partner (Recipients of e-mails, letters, etc.), Users (e.g. website visitors, users of online services).
- **Legal Basis** - Consent (Article 6 (1) (a) GDPR), Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

Services and service providers being used

- **Confluence** - Software for the creation and administration of Wiki & knowledge platforms; Service provider: Atlassian Inc. (San Francisco, Harrison Street Location), 1098 Harrison Street, San Francisco, California 94103, USA; Website: <https://www.atlassian.com/software/confluence>; Privacy Policy: <https://www.atlassian.com/legal/privacy-policy>.
- **Jira** - Web application for error management, troubleshooting and operational project management; Service provider: Atlassian Inc. (San Francisco, Harrison Street Location), 1098 Harrison Street, San Francisco, California 94103, USA; Website: <https://www.atlassian.com/de/software/jira>; Privacy Policy: <https://www.atlassian.com/legal/privacy-policy>.
- **Trello** - Project management tool; Service provider: Trello Inc., 55 Broadway New York, NY 10006, USA, parent company: Atlassian Inc. (San Francisco, Harrison Street Location), 1098 Harrison Street, San Francisco, California 94103, USA; Website: <https://trello.com/>; Privacy Policy: <https://trello.com/privacy>.

Erasure of data

The data processed by us will be erased in accordance with the statutory provisions as soon as their processing is revoked or other permissions no longer apply (e.g. if the purpose of processing this data no longer applies or they are not required for the purpose).

If the data is not deleted because they are required for other and legally permissible purposes, their processing is limited to these purposes. This means that the data will be restricted and not processed for other purposes. This applies, for example, to data that must be stored for commercial or tax reasons or for which storage is necessary to assert, exercise or defend legal claims or to protect the rights of another natural or legal person.

Further information on the erasure of personal data can also be found in the individual data protection notices of this privacy policy.

Changes and Updates to the Privacy Policy

We kindly ask you to inform yourself regularly about the contents of our data protection declaration. We will adjust the privacy policy as changes in our data processing practices make this necessary. We will inform you as soon as the changes require your cooperation (e.g. consent) or other individual notification.

If we provide addresses and contact information of companies and organizations in this privacy policy, we ask you to note that addresses may change over time and to verify the information before contacting us.

Rights of Data Subjects

As data subject, you are entitled to various rights under the GDPR, which arise in particular from Articles 15 to 21 of the GDPR:

- **Right to Object** - You have the right, on grounds arising from your particular situation, to object at any time to the processing of your personal data which is based on letter (e) or (f) of Article 6(1) GDPR, including profiling based on those provisions. Where personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of the personal data concerning you for the purpose of such marketing, which includes profiling to the extent that it is related to such direct marketing.
- **Right of withdrawal for consents** - You have the right to revoke consents at any time.
- **Right of access** - You have the right to request confirmation as to whether the data in question will be processed and to be informed of this data and to receive further information and a copy of the data in accordance with the provisions of the law.
- **Right to rectification** - You have the right, in accordance with the law, to request the completion of the data concerning you or the rectification of the incorrect data concerning you.
- **Right to Erasure and Right to Restriction of Processing** - In accordance with the statutory provisions, you have the right to demand that the relevant data be erased immediately or, alternatively, to demand that the processing of the data be restricted in accordance with the statutory provisions.
- **Right to data portability** - You have the right to receive data concerning you which you have provided to us in a structured, common and machine-readable format in accordance with the legal requirements, or to request its transmission to another controller.
- **Complaint to the supervisory authority** - You also have the right, under the conditions laid down by law, to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the GDPR.

Supervisory authority competent for us

Der Landesbeauftragte für den Datenschutz und die Informationsfreiheit
Königstrasse 10 a
70173 Stuttgart
Germany

Der Bundesbeauftragte für den Datenschutz und die Informationsfreiheit
Graurheindorfer Str. 153
53117 Bonn
Germany

Terminology and Definitions

This section provides an overview of the terms used in this privacy policy. Many of the terms are drawn from the law and defined mainly in Article 4 GDPR. The legal definitions are binding. The following explanations, on the other hand, are intended above all for the purpose of comprehension. The terms are sorted alphabetically.

- **Controller** - "Controller" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
- **Personal Data** - "personal data" means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- **Processing** - The term "processing" covers a wide range and practically every handling of data, be it collection, evaluation, storage, transmission or erasure.