Data Privacy and Data Security Concept of Trebbau direct media GmbH

Controller:

Trebbau direct media GmbH

Schönhauser Str. 21

50968 Cologne

– hereinafter referred to as Trebbau –

Managing directors: Simone Heger, Jörg Hennig, Gerd Kölzer - Adviser: Karl-Peter Trebbau

Our data protection officer can be reached at:

Helsper & Helsper – Attorneys
Mr. Rudolf Helsper
Am Kielshof 18
51105 Cologne

Tel.: +49 221 9834240 – email: helsper@helsper-koeln.de

Preamble

Trebbau operates as lettershop as well as data-processing company within the framework of order processing. On the basis of this field of operation, Trebbau is subject to the 2016/79 EU Regulation on the protection of individuals with regard to the processing of personal data (GDPR). In addition, Trebbau undertakes to comply with the specific requirements regarding quality and performance standards (QuLS) of the German Dialogue Marketing Association (DDV), and thus has subjected itself to further obligations beyond the law in order to ensure a particularly high level of data protection for its customers, business partners and suppliers, but also for its employees. In the context of the processing of personal data, particular focus is placed on the relationship between the address owners, list owners, list brokers, advertisers and other order processors.

Furthermore, Trebbau recognise their commitment to the recipients of advertisement, and therefore offer clients their full support in the fulfilment of their data protection obligations.

1. Technical and organisational measures (TOMs)

CONFIDENTIALITY

Entry control

As an organisational rule, visitors are at no time permitted to be in the building by themselves, or to move around freely. Staff is trained accordingly on a regular basis.

Accesses to the building are locked at all times, and cannot be opened from the outside without safety keys or – during general business hours – via time recording cards provided to staff. Visitors sign in at the central reception, or in case of deliveries, at the reception of the receiving goods department. Visitors must be picked up personally by an employee, registered in a visitors log, and receive a visitor's tag. Visitors may access sensitive areas only in the company of staff who have submitted a statement of commitment to maintain confidentiality. Outside regular business hours, the alarm system in compliance with VDE standards monitors the premises. System messages are monitored by a security agency, and processed according to a documented intervention plan. Some of the windows on ground level are barred with gratings or protected by metal blinds.

Access control

Access to data processing systems is not permitted to unauthorised individuals. Access to our IT systems via external interfaces is protected by a firewall. Publicly available services, such as Bastion Hosts with email or internet access, are secured through appropriate separation from the internal network (DMZ). All PC systems are password-protected. Passwords must meet stringent requirements and must be compulsorily renewed on a regular basis. Old passwords cannot be reused. After ten failed attempts to log in, the relevant user access is blocked automatically. A circle limited to a few employees has external access options to access our systems via TPN tunnel, which can exclusively be used through two-factor authentication.

Data access control

Access to network directories that store personal data is restricted to those persons that are involved in the processing of relevant orders for which the data is required. The system requires these persons to identify themselves accordingly. Production systems, in particular, can exclusively access one network directory that has been established specifically for the system. Data are stored in these directories only as long as they are required directly for the production process. The usage of the programme is logged, as well as the retrieval of data from records. The server can only be booted up upon entering a password. All storage media are locked when stored.

Separation rule

By separating the orders from each other by putting these into separate order folders and network directories that are separated from each other, it is ensured that data collected for different reasons are processed separately.

INTEGRITY

Data transmission control

If the transfer of personal data is required, the data exchange will take place via our data exchange server (DataStore). The user must log in prior to the use of DataStore. For individual searches, an additional unambiguous password is required which is given exclusively to authorised users through a different medium. Personal data are exclusively sent within the legally defined scope. Data are exchanged in encrypted form. The transmission path is password-protected.

Documents with references made to a person must be collected in lockable containers of a certified company that is specified in the area of file destruction and archiving, and then must be destroyed by the latter in compliance with general data protection regulations. The destruction of the files and documents must be logged accordingly. Within the lettershop sector, this also applies to waste paper (personalised promotional letters and catalogues). In addition to the disposal of documents, the contracted service provider also assumes responsibility for the destruction of data tapes. CDs and DVDs are shredded.

Input control

The IT system used also automatically logs user activities. Furthermore, for orders in written form it is logged that and by who and where address data are saved onto our servers. Modifications to the address data (removing duplicate address records, qualifying addresses) are documented by saving the different productions stages.

AVAILABILITY AND CAPACITY

Availability control / recoverability

Our IT systems are protected by RAID systems against data loss. UPS systems, virus protection and firewall, as well as daily data backups ensure that no data are lost, if the IT systems fail. In case of fire or other events that could damage the IT system, the data backup system is also stored outside the server area. In order to minimise potential fire damage, our company is equipped with a fire alarm system. System messages are monitored by a security agency, and processed according to a documented intervention plan.

REGULAR INSPECTION PROCEDURE

Order control

Instructions by the client are documented in writing. Orders are managed and documented with our own software. As an organisational rule, orders are reviewed based on the two person integrity principle. Follow up reviews are carried out.

Training

All employees are reminded of their obligations to maintain the confidentiality during an annual training, and confirm their agreement with their signatures. This annual training is held, in particular, with regard to the principles of data protection (especially the prerequisites for order processing), use of the Robinson list, obligation to keep company and business secrets confidential, careful handling of data media and files, secrecy of telecommunications, and the quality and performance standards (QuLS + Declaration of Commitment (SVE)) of the German Dialogue Marketing Association (DDV).

Review of data protection measures

The Trebbau data protection tem holds meetings twice a year. The meetings serve to review the current processing of data as well as the measures implemented for the protection of the data . Any potential for improvement is also discussed in that regard.

Seal of the Quality and Performance Standards **(QuLS) of the German Dialogue Marketing Association (DDV) / Lettershop, Data Processing and Listbroking**

Every year, Trebbau submits a declaration of commitment (SVE) to the German Dialogue Marketing Association (DDV). Here, the measures implemented by the company are checked for compliance with statutory regulations in more than 70 sections and sub-sections. In the declaration of commitment (SVE), Trebbau also explains the measures implemented in order to define applicable obligations of the German Dialogue Marketing Association (DDV) quality and performance seal that go beyond statutory requirements.

Independent appraisers monitor the compliance with the obligations from the submitted declaration of commitment (SVE). As token for the special quality of Trebbau's performances, the German Dialogue Marketing Association (DDV) has awarded us the DDV Quality and Performance Seal (QuLS) 2018/2019.

2. Conduct towards the owner of the addresses

Trebbau has signed the Declaration of Commitment of the German Dialogue Marketing Association (DDV), and entrusted it to the association for publication.

3. Sub-contracting

If other service providers or sub-contractors of Trebbau are commissioned, and the commission requires the handling of personal data, it will be imperative to have the subcontracted company sign a letter of commitment with regard to the data protection regulations in compliance with the standards for the German Dialogue Marketing Association (DDV). If the granting of such contractual relationship requires the consent of a third party, Trebbau will obtain the respective consent through the client.

Last updated: January 2019