

Stanton Chase Privacy Policy

Last update: July 2022

1. An overview of data protection

General information

The following information will provide you with an easy to navigate overview of what will happen with your personal data when you visit this website. The term “personal data” comprises all data that can be used to personally identify you. For detailed information about the subject matter of data protection, please consult our Data Protection Declaration, which we have included beneath this copy.

Data recording on this website

The data on this website is processed by the operator of the website, whose contact information is available under section “Information about the responsible party” in this Privacy Policy.

We collect your data as a result of your sharing of your data with us. This may, for instance be information you enter into our contact form. Other data shall be recorded by our IT-systems automatically or after you consent to its recording during your website visit. This data comprises primarily technical information (e.g., web browser, operating system, or time the site was accessed). This information is recorded automatically when you access this website. A portion of the information is generated to guarantee the error free provision of the website. Other data may be used to analyze your user patterns.

You have the right to receive information about the source, recipients, and purposes of your archived personal data at any time without having to pay a fee for such disclosures. You also have the right to demand that your data are rectified or eradicated. If you have consented to data processing, you have the option to revoke this consent at any time, which shall affect all future data processing. Moreover, you have the right to demand that the processing of your data be restricted under certain circumstances. Furthermore, you have the right to log a complaint with the competent supervising agency. Please do not hesitate to contact us at any time if you have questions about this or any other data protection related issues.

Analysis tools and tools provided by third parties

There is a possibility that your browsing patterns will be statistically analyzed when you visit this website. Such analyses are performed primarily with what we refer to as analysis programs. For detailed information about these analysis programs please consult our Data Protection Declaration below.

2. Hosting

External Hosting

This website is hosted by an external service provider (host). Personal data collected on this website are stored on the servers of the host. These may include, but are not limited to, IP addresses, contact requests, metadata and communications, contract information, contact information, names, web page access, and other data generated through a web site. The host is used for the purpose of fulfilling the contract with our potential and existing customers and in the interest of secure, fast, and efficient provision of our online services by a professional provider. If appropriate consent has been obtained. This consent can be revoked at any time. Our host will only process your data to the extent necessary to fulfil its performance obligations and to follow our instructions with respect to such data.

We are using the following host:

FastComet Inc.
350 Townsend St., Suite 300 - #846
San Francisco, CA 94107
USA

We have concluded a data processing agreement (DPA) with the above-mentioned provider. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with data privacy laws.

3. General information and mandatory information

Data protection

The operators of this website and its pages take the protection of your personal data very seriously. Hence, we handle your personal data as confidential information and in compliance with the statutory data protection regulations and this Data Protection Declaration.

Whenever you use this website, a variety of personal information will be collected. Personal data comprises data that can be used to personally identify you. This Data Protection Declaration explains which data we collect as well as the purposes we use this data for. It also explains how, and for which purpose the information is collected. We herewith advise you that the transmission of data via the Internet (i.e., through e-mail communications) may be prone to security gaps. It is not possible to completely protect data against third-party access.

Information about the responsible party

The data processing controller on this website is:

Stanton Chase Inc.

3800 North Lamar Boulevard, Suite 200

Austin, TX 78756

USA

E-mail: contact@stantonchase.com

The controller is the natural person or legal entity that single-handedly or jointly with others makes decisions as to the purposes of and resources for the processing of personal data (e.g., names, e-mail addresses, etc.).

Storage duration

Unless a more specific storage period has been specified in this privacy policy, your personal data will remain with us until the purpose for which it was collected no longer applies. If you assert a justified request for deletion or revoke your consent to data processing, your data will be deleted, unless we have other legally permissible reasons for storing your personal data (e.g., tax or commercial law retention periods); in the latter case, the deletion will take place after these reasons cease to apply.

General information on the legal basis for the data processing on this website

If you have consented to data processing, we process your personal data on the basis of this consent. The consent can be revoked at any time. We can also process your data if required for the fulfillment of a contract or for the implementation of pre-contractual measures or if your data is required for the fulfillment of a legal obligation. Furthermore, the data processing may be carried out on the basis of our legitimate interest..

Information on data transfer

Among other things, we may use tools of companies domiciled in other countries. If these tools are active, your personal data may potentially be transferred to these countries and may be processed there. In these countries, the data protection laws enacted there apply. We have no control over these processing activities.

Revocation of your consent to the processing of data

Some data processing transactions are possible only subject to your express consent. You can revoke at any time any consent you have already given us. This shall be without prejudice to the lawfulness of any data collection that occurred prior to your revocation.

Right to object to the collection of data in special cases; right to object to direct advertising

You may at any time object to the processing of your personal data based on grounds arising from your unique situation. This also applies to any profiling based on these provisions. To determine the legal basis, on which any processing of data is based, please consult this data protection declaration. If you log an objection, we will no longer process your affected personal data, unless we are in a position to present compelling protection worthy grounds for the processing of your data, that outweigh your interests, rights and freedoms or if the purpose of the processing is the claiming, exercising or defence of legal entitlements. If your personal data is being processed in order to engage in direct advertising, you have the right to object to the processing of your affected personal data for the purposes of such advertising at any time. This also applies to profiling to the extent that it is affiliated with such direct advertising. If you object, your personal data will subsequently no longer be used for direct advertising purposes.

Right to log a complaint with a supervisory agency

Data subjects may appeal to a supervisory authority. The right to log a complaint is in effect regardless of any other administrative or court proceedings available as legal recourses.

Information about, rectification and eradication of data

Within the scope of the applicable statutory provisions, you can at any time ask us about your archived personal data, their source and recipients as well as the purpose of the processing of your data. You may also have your data rectified or eradicated. If you have questions about this subject matter or any other questions about personal data, please do not hesitate to contact us at any time.

Right to demand processing restrictions

You may demand the imposition of restrictions as far as the processing of your personal data is concerned. To do so, you may contact us at any time. A restriction of processing may apply in the following cases:

- In the event that you should dispute the correctness of your data archived by us, we will usually need some time to verify this claim. During the time that this investigation is ongoing, you have the right to demand that we restrict the processing of your personal data.
- If the processing of your personal data was/is conducted in an unlawful manner, you have the option to demand the restriction of the processing of your data in lieu of demanding the eradication of this data.
- If we do not need your personal data any longer and you need it to exercise, defend or claim legal entitlements, you have the right to demand the restriction of the processing of your personal data instead of its eradication.
- If you have raised an objection, your rights and our rights will have to be weighed against each other. As long as it has not been determined whose interests prevail, you have the right to demand a restriction of the processing of your personal data.
- If you have restricted the processing of your personal data, these data – with the exception of their archiving – may be processed only subject to your consent or to claim, exercise or defend legal entitlements or to protect the rights of other natural persons or legal entities or for important public interest reasons cited by the European Union or a member state of the EU.

SSL and/or TLS encryption

For security reasons and to protect the transmission of confidential content this website uses either an SSL or a TLS encryption program. You can recognize an encrypted connection by checking whether the address line of the browser switches from “http://” to “https://” and also by the appearance of the lock icon in the browser line. If the SSL or TLS encryption is activated, data you transmit to us cannot be read by third parties.

4. Recording of data on this website

Cookies

Our websites and pages use what the industry refers to as “cookies.” Cookies are small text files that do not cause any damage to your device. They are either stored temporarily for the duration of a session (session cookies) or they are permanently archived on your device (permanent cookies). Session cookies are automatically deleted once you terminate your visit. Permanent cookies remain archived on your device until you actively delete them, or they are automatically eradicated by your web browser. In some cases, it is possible that third-party cookies are stored on your device once you enter our site (third-party cookies). These cookies enable you or us to take advantage of certain services offered by the third party (e.g., cookies for the processing of payment services).

Cookies have a variety of functions. Many cookies are technically essential since certain website functions would not work in the absence of the cookies (e.g., the shopping cart function or the display of videos). The purpose of other cookies may be the analysis of user patterns or the display of promotional messages. Cookies, which are required for the performance of electronic communication transactions, or for the provision of certain functions you want to use (e.g., for a shopping cart function) or those that are necessary for the optimization (required cookies) of the website (e.g., cookies that provide measurable insights into the web audience), shall be stored on the basis of our legitimate interest, unless a different legal basis is cited. The operator of the website has a legitimate interest in the storage of required cookies to ensure the technically error free and optimized provision of the operator’s services. If your consent to the storage of the cookies and similar recognition

technologies has been requested, processing occurs exclusively on the basis of the consent obtained. The consent may be revoked at any time.

You have the option to set up your browser in such a manner that you will be notified any time cookies are placed and to permit the acceptance of cookies only in specific cases. You may also exclude the acceptance of cookies in certain cases or in general or activate the delete function for the automatic eradication of cookies when the browser closes. If cookies are deactivated, the functions of this website may be limited.

In the event that third-party cookies are used or if cookies are used for analytical purposes, we will separately notify you in conjunction with this Data Protection Policy and, if applicable, ask for your consent.

List of cookies that make our website work

<https://www.stantonchase.com/cookie-form/>

Server log files

The provider of this website and its pages automatically collects and stores information in so-called server log files, which your browser communicates to us automatically. The information comprises:

- The type and version of browser used
- The used operating system
- Referrer-URL
- The hostname of the accessing computer
- The time of the server inquiry
- The IP-address

This data is not merged with other data sources. The operator of the website has a legitimate interest in the technically error free depiction and the optimization of the operator's website. In order to achieve this, server log files must be recorded.

Request by e-mail, telephone or fax

If you contact us by e-mail, telephone or fax, your request, including all resulting personal data (name, request) will be stored and processed by us for the purpose of processing your request. These data are processed if your inquiry is related to the fulfillment of a contract or is required for the performance of pre-contractual measures. In all other cases, the data are processed on the basis of our legitimate interest in the effective handling of inquiries submitted to us or on the basis of your consent. If it has been obtained; the consent can be revoked at any time. The data sent by you to us via contact requests remain with us until you request us to delete, revoke your consent to the storage or the purpose for the data storage lapses (e.g. after completion of your request). Mandatory statutory provisions - in particular statutory retention periods - remain unaffected.

5. Analysis tools and advertising

Google Tag Manager

We use the Google Tag Manager. The provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. The Google Tag Manager is a tool that allows us to integrate tracking or statistical tools and other technologies on our website. The Google Tag Manager itself does not create any user profiles, does not store cookies, and does not carry out any independent analyses. It only manages and runs the tools integrated via it. However, the Google Tag Manager does collect your IP address. The Google Tag Manager is used on the basis of our legitimate interest in the quick and uncomplicated integration and administration of various tools on his website. If appropriate consent has been obtained, this consent can be revoked at any time.

Google Analytics

This website uses functions of the web analysis service Google Analytics. The provider of this service is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland. Google Analytics enables the website operator to analyze the behavior patterns of website visitors. To that end, the website operator receives a variety of user data, such as pages accessed, time spent on the

page, the utilized operating system and the user's origin. This data is assigned to the respective end device of the user. An assignment to a user-ID does not take place. Google Analytics uses technologies that make the recognition of the user for the purpose of analyzing the user behavior patterns (e.g., cookies or device fingerprinting). The website use information recorded by Google is, as a rule transferred to a Google server in the United States, where it is stored. The use of these services occurs on the basis of your consent. You may revoke your consent at any time.

On this website, we have activated the IP anonymization function. As a result, your IP address will be abbreviated by Google within the member states of the European Union or in other states that have ratified the Convention on the European Economic Area prior to its transmission to the United States. The full IP-address will be transmitted to one of Google's servers in the United States and abbreviated there only in exceptional cases. On behalf of the operator of this website, Google shall use this information to analyze your use of this website to generate reports on website activities and to render other services to the operator of this website that are related to the use of the website and the Internet. The IP address transmitted in conjunction with Google Analytics from your browser shall not be merged with other data in Google's possession.

You can prevent the recording and processing of your data by Google by downloading and installing the browser plugin available under the following link:

<https://tools.google.com/dlpage/gaoptout?hl=en>.

For more information about the handling of user data by Google Analytics, please consult Google's Data Privacy Declaration at: <https://support.google.com/analytics/answer/6004245?hl=en>.

We have executed a contract data processing agreement with Google.

6. Newsletter

If you would like to subscribe to the newsletter offered on this website, we will need from you an e-mail address as well as information that allow us to verify that you are the owner of the e-mail address provided and consent to the receipt of the newsletter. No further data shall be collected or shall be collected only on a voluntary basis. We shall use such data only for the sending of the requested information and shall not share such data with any third parties. The processing of the information entered into the newsletter subscription form shall occur exclusively on the basis of your consent. You may revoke the consent you have given to the archiving of data, the e-mail address, and the use of this information for the sending of the newsletter at any time, for instance by clicking on the "Unsubscribe" link in the newsletter. This shall be without prejudice to the lawfulness of any data processing transactions that have taken place to date. The data deposited with us for the purpose of subscribing to the newsletter will be stored by us until you unsubscribe from the newsletter or the newsletter service provider and deleted from the newsletter distribution list after you unsubscribe from the newsletter or after the purpose has ceased to apply. We reserve the right to delete or block e-mail addresses from our newsletter distribution list at our own discretion within the scope of our legitimate interest. Data stored for other purposes with us remain unaffected.

After you unsubscribe from the newsletter distribution list, your e-mail address may be stored by us or the newsletter service provider in a blacklist, if such action is necessary to prevent future mailings. The data from the blacklist is used only for this purpose and not merged with other data. This serves both your interest and our interest in complying with the legal requirements when sending newsletters. The storage in the blacklist is indefinite. You may object to the storage if your interests outweigh our legitimate interest.

7. Google Web Fonts

To ensure that fonts used on this website are uniform, this website uses so-called Web Fonts provided by Google. When you access a page on our website, your browser will load the required web fonts into your browser cache to correctly display text and fonts. To do this, the browser you use will have to establish a connection with Google's servers. As a result, Google will learn that your IP address was used to access this website. The use of Google Web Fonts is based on a legitimate interest in a uniform presentation of the font on the operator's website. If appropriate consent has been obtained, the processing is carried out exclusively on the consent. This consent can be revoked at any time. If your browser should not support Web Fonts, a standard font installed on your computer will be used. For more information on Google Web Fonts, please follow this link:

<https://developers.google.com/fonts/faq> and consult Google's Data Privacy Declaration under:

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

8. Processing of Customer and Contract Data

We collect, process, and use personal customer and contract data for the establishment, content arrangement and modification of our contractual relationships. Data with personal references to the use of this website (usage data) will be collected, processed, and used only if this is necessary to enable the user to use our services or required for billing purposes. The collected customer data shall be deleted upon completion of the order or termination of the business relationship and upon expiration of any existing statutory archiving periods. This shall be without prejudice to any statutory archiving periods.

9. Custom Services

Handling applicant data

It is possible to submit job applications to us (e.g., via e-mail). Also, it is possible to send application documents to be used for the candidate search for one of our clients. Below, we will inform you on the scope, purpose and use of the personal data that are sent by you. We assure you that the collection, processing, and use of your data will occur in compliance with the applicable data privacy rights and all other statutory provisions.

Scope and purpose of the collection of data: If you submit a job application to us, we will process any affiliated personal data (e.g., contact and communications data, application documents, notes taken during job interviews, etc.), if they are required to make a decision concerning the establishment or an employment relationship. The legal grounds for the aforementioned are negotiation of an Employment Relationship or – provided you have given us your consent – your consent. You may revoke any consent given at any time. Within our company, your personal data will only be shared with individuals who are involved in the processing of your job application. If your job application should result in your recruitment, the data you have submitted will be archived on the grounds of the purpose of implementing the employment relationship in our data processing system.

If we are unable to make you a job offer or you reject a job offer or withdraw your application, we reserve the right to retain the data you have submitted on the basis of our legitimate interests for up to 6 months from the end of the application procedure (rejection or withdrawal of the application). Afterwards the data will be deleted, and the physical application documents will be destroyed. The storage serves in particular as evidence in the event of a legal dispute. If it is evident that the data will be required after the expiry of the 6-month period (e.g., due to an impending or pending legal dispute), deletion will only take place when the purpose for further storage no longer applies. Longer storage may also take place if you have given your agreement or if statutory data retention requirements preclude the deletion.

If you send us application documents to be considered for the candidate search of one of our clients, we only store your data temporarily. But with your consent, we will make your details available to Stanton Chase Offices worldwide via our candidate database. Stanton Chase Offices worldwide have access and can consider you for positions. If after 7 years your data has not been considered for one of the positions to be filled through us, Stanton Chase will delete your data from our database.