

Data Protection Notice

For the processing activity

Learning Management System (Totara eLearning Platform)

These notes inform you as an employee, Group employee, partner company employee, customer, other business partner or outsider (visitors, guests, interested parties) or, if applicable, as a further affected person of another person responsible for whom we work as a processor or otherwise, about the processing of your personal data by Everllence SE and the rights to which they are entitled under data protection law.

Who is responsible for data processing?

Responsible is

Everllence SE
Represented by the Executive Board
Stadtbachstrasse 1
86153 Augsburg, Germany
Phone: +49 821 322-0
Fax: +49 821 322-4240

If another EVERLLENCE company alone or together with others decides on the purposes and means of processing personal data, this company is (also) responsible.

If you have any questions about this information, you can also contact our data protection officer:

Data Protection Officer
Everllence SE
Human Resources
Steinbrinkstr. 1
46145 Oberhausen, Germany
E-mail: dataprotection@everllence.com

For what purposes and on what legal basis is which data processed?

We process your personal data in compliance with the EU General Data Protection Agreement (GDPR), the German Federal Data Protection Act (BDSG) and all other relevant national laws.

In the concrete business process Learning Management System (Totara eLearning Platform) your personal data

- **Professional contact and (work) organizational data** e.g. surname, first name, gender, address, e-mail address, nationality, organization/company, role, individual group, cost center, responsibility, department / area, personnel number / participant ID; in the future possibly: e.g. title, task description, functions, activity, entry date, job title, professional

career, qualification in order to be able to offer specific further training for certain positions

- **IT usage data** e.g. Roles, permissions, operating system version, browser version, Flash plug-in version, screen and window size, IP address, login/logout date and time the learner spent in the system (for helpdesk support), bookmarks, WBT (Web Based Training) number, booking ID, booking date, booking status, Course name / ID, course language, course time, training provider, last visited page, processing status, completion status, success status, progress measurement, success point / rate, question details, number of LMS visitors, first access date, date of last saving of learning data in the LMS, number of questions, number of correct answers
- **Private contact and identification data** e.g. e-mail address and private address for external customers e.g. students possible (not for EVERLLENCE employees)
- In the future possibly **Creditworthiness and bank data** e.g. account details, credit card number, etc. (only credit card payment from external customers possible, no further checks will be carried out) (not for EVERLLENCE employees)
- In the future possibly employee e.g. **employee photo** to provide interaction and chat possibilities
- **Test results** e.g. processing status, completion status, success status, progress measurement, success points/rate, question details, test result as hardcopy

also from the following sources

- ADFS (Active Directory Federation Services) required for authentication of internal & external users. An interface to the extranet is also provided
- FIM (Microsoft Forefront Identity Manager) the interface to FIM is required to synchronize data from LMS with our internal user database and to enable single sign-on i.e. automatic login in the EVERLLENCE network
- Nexus (customer platform, all external customers have access to the eAcademy, which is why the data base is also transferred, general registration of customers will take place via Nexus)

are processed for the following purposes:

Training purposes and learning management.

The legal basis for the processing is the performance of a contract, compliance with a legal obligation, consent and/or legitimate interest. For EVERLLENCE employees, the legal basis is the employment contract (see also information on data protection for EVERLLENCE employees). For external customers, the legal basis is the service contract in connection with the legitimate interest in being able to carry out this contract and in recording and training the individual participants as well as consent of the participants.

Right of Objection

If we process your data to protect legitimate interests, you may object to such processing if your particular situation gives rise to reasons against data processing.

To which recipients or categories of recipients do we pass on your data in the context of this processing activity?

External client of the training

If you participate in our eLearning courses as an external participant from another company, it is possible that we will forward your test results to the client of the training.

Contract Processors

In order to fulfil our contractual and legal obligations, we make use of the following external service providers:

- Arrabiata Solutions GmbH, Germany (setting up the EVERLLENCE specific Totara platform + later service & maintenance)
- SpeedPartner GmbH, 41470 Germany (data center)
- Totara Learning Europe Ltd, UK (LMS provider, for additional support only)

As far as legally prescribed, we transmit your personal data in individual cases e.g. to authorities for the fulfilment of legal notification obligations.

How do we transfer data outside Europe?

No data is transmitted to non-European countries.

How long do we store your data?

Data will be consistently deleted if the person concerned so wishes. A regular deletion is planned after a period of 20 years in order to be able to offer a learning history and corresponding training courses.

What data protection rights do you have?

In addition to the right of objection, you have a right of access and, under certain conditions, correction or deletion of your data and a right to limitation of processing. To exercise these rights, please contact the above address.

Would you like to complain about the handling of your data?

You have the option of contacting the data protection officer mentioned above or a data protection supervisory authority. The data protection supervisory authority responsible for us is the Bavarian State Office for Data Protection Supervision (BayLDA).

Status of this information: May-25 If there are any relevant changes to this information, we will notify you again if necessary