

# Privacy Policy Customer Portal

Following information is to be provided pursuant to Art. 13 et seq. GDPR where personal data are collected from users of the Customer Portal on our website.

## 1. Identity and contact details of the controller

Lauterbach GmbH  
Altlaufstraße 40  
85635 Höhenkirchen-Siegertsbrunn  
Phone: +49 8102 9876 150  
(hereinafter "Lauterbach", "we", "us").

## 2. Contact details of the data protection officer

Holzhofer Consulting GmbH  
Martin Holzhofer  
Lochhamer Str. 31  
82152 Planegg  
GERMANY  
Phone: +49 89 1 25 01 56 00  
E-Mail: dsb-lauterbach@holzhofer-consulting.de

## 3. Purposes of the processing for which the personal data are processed as well as the legal basis for the processing

### 3.1. Processing of access data / Server log files

For technical reasons, we process a limited amount of data (so-called connection data or server log files) each time you access or use our Customer Portal. This data is technically necessary to set up and execute a connection between your end device and our servers. This data is processed in the main storage of the web server.

The following data or data categories are collected:

- IP address
- MAC address
- Source port of the accessing device or a gateway (e.g. firewall or proxy)
- Time stamp (date and time) of the request
- Amount of data transferred
- Message, whether the request was successful (using HTTP error code)
- Message, explaining why the request failed (using the HTTP error code)
- Referrer URL (website from which our main page or subpages were accessed)
- Host name of the accessing computer



- User agent (type of browser used to access our website as well as its version)
- Width and height of the display screen
- Language settings of your browser
- Session ID

There is no merge of this data with other data sources. The IP address, timestamp, HTTP error code, referrer and user agent are automatically logged when our websites are accessed in order to ensure the functionality and protection of our websites. Your IP address is only processed in the logs in abbreviated form and is thus anonymized. A creation of user profiles with personal reference is not possible for us with this data.

The storage of information in the end user's terminal equipment or access to information is carried out in accordance with § 25 (2) no. 2 TDDDG (German Telecommunications Digital Services Data Protection Act). The processing of personal data is based on our legitimate interest pursuant to Art. 6 (1) lit. f GDPR. A legitimate interest's assessment was carried out and came to the conclusion that the processing is necessary to safeguard our legitimate interests and that these outweigh your interests, fundamental rights and freedoms which require protection of personal data. We have a legitimate interest in making our Customer Portal on this website available to users.

## 3.2. Cookies and related technologies

### 3.2.1 General

This website/customer portal partly uses so-called cookies and related technologies (e.g. scripts). Cookies do not cause any damage to your computer and do not contain viruses. Cookies serve to make our offer more user-friendly, effective and secure. Cookies are small text files that are stored on your terminal device and saved by your browser, for example to "remember" information about you, such as your language settings or login information. These cookies are sometimes set by us and are referred to as first-party cookies. We also use third-party cookies, which come from a different domain than the one of the websites you are visiting.

By selecting the appropriate technical settings in your Internet browser, you can be notified before cookies are set and decide whether to accept them individually and prevent the storage of cookies and transmission of the data they contain. Cookies that have already been saved can be deleted at any time. However, we would like to point out that you may then not be able to use all the functions of our website to their full extent.

You can find out how to manage (including deactivating) cookies in the most important browsers by clicking on the links below:

- Chrome Browser: <https://support.google.com/accounts/answer/61416?hl=de>
- Mozilla Firefox: <https://support.mozilla.org/de/kb/cookies-erlauben-und-ablehnen>
- Safari: <https://support.apple.com/de-de/guide/safari/manage-cookies-and-website-data-sfri11471/mac>

Basically, we distinguish between the following categories:

- Technically necessary cookies and related technologies
- Comfort cookies and related technologies
- Cookies and related technologies for marketing purposes (e.g. Matomo Tracking)



You can find more information on the individual categories as well as the option to reject each cookie category (with the exception of technically necessary cookies) and in addition a list of all cookies used in the "Cookie Settings" under the following link: [Configure](#)

### 3.2.2. Technically necessary cookies and related technologies

Most of the cookies we use are so-called "session cookies". They are automatically deleted after the end of your visit. Such cookies are mandatory and technically necessary for the operation of the website and to provide the service requested by the user and can therefore not be disabled.

The storage of information in the end user's terminal equipment or access to information is carried out in accordance with § 25 (2) no. 2 TDDDG. The processing of personal data is based on our legitimate interest in ensuring the optimal functionality of the Customer Portal as well as a user-friendly and effective design of our offer pursuant to Art. 6 (1) lit. f GDPR. A legitimate interest's assessment was carried out and came to the conclusion that the processing is necessary to safeguard our legitimate interests and that these outweigh your interests, fundamental rights and freedoms which require protection of personal data.

### 3.2.3 Cookies requiring consent such as analysis and tracking cookies and related technologies (e.g. tracking scripts)

Additional advertising, marketing and analysis tools as well as other third-party services (e.g. online video platforms) might be implemented on our Customer Portal. These are not technically necessary for the operation of the website, but serve, for example, to record the behavior of the user, to provide him or her advertising tailored to this or to enable an analysis of the use of our website (e.g. Matomo Analytics).

**An overview of all third-party services integrated in the Customer Portal, as well as detailed information on each of these services, can be found under section 11.**

### 3.3. Data processing in connection with the creation of an account for our Customer Portal

On our website, you have the option of registering for our Customer Portal. The associated processing is carried out for the purpose of providing you with certain functions and content (e.g. Product Registration, Download TRACE32 Software or Email Notifications in connection with the TRACE32 products and Events).

The following data or data categories are collected and processed:

- First name
- Last name
- E-Mail address
- Password

Mandatory information requested during registration must be provided completely. Otherwise, we will reject the registration.

We use the Open-Source software Keycloak as our identity manager. As part of the registration process, a single sign-on access is generated via Keycloak. All information on the tool can be found here: <https://www.keycloak.org/>.

In addition, we use NuxtUI and NuxtJS as Open-Source JavaScript libraries and web frameworks for the web application. Further information on the tool can be found here: <https://nuxt.com/>



We operate both tools on premise, i.e. on our own servers. Data is therefore not transferred to external recipients.

The legal basis for processing your data is our legitimate interest pursuant to Art. 6 (1) lit. f GDPR. A legitimate interest's assessment has been carried out and came to the conclusion that the interests of the data subjects do not override our interests in the processing. We have a legitimate interest in providing a customer portal for the use of certain functions and services with the possibility for our B2B customers to create a customer account, for which the processing of the data and data categories mentioned here is necessary.

### 3.3. Data processing in connection with E-mail Notifications

Registered users of our Customer Portal can also choose to receive an e-mail notification when we launch a new version of the TRACE32 software. They can do this by activating the notifications under Settings > Notifications in their account.

The following data or data categories are collected and processed:

- First name
- Last name
- E-Mail address

The e-mails for this will be sent with our Open-Source Content-Management-System Directus from Monospace, Inc., 800 Boylston St. Suite 1410 Boston, MA 02199, USA. In addition, content of the pages, downloads and so on are stored therein. Directus is a so-called Headless-CMS, which we operate on premise, i.e. on our own servers. Data is therefore not transferred to external recipients.

Users are able to change their notification settings at any time within their user account, if they no longer wish to receive e-mail notifications.

The legal basis for the processing of your data is your voluntary and informed consent in accordance with Art. 6 (1) lit. a GDPR. The consent to be provided is given by the fact that the "e-mail notification" function is completely voluntary and you can also use the Customer Portal without this function. You can withdraw your consent at any time and without giving reasons by notifying us, without affecting the lawfulness of processing based on consent before its withdrawal. We will then no longer send you e-mail notifications.

### 3.5 Newsletter registration

If you would like to be informed regularly about new products or other interesting topics, Lauterbach offers to receive a newsletter.

To subscribe to the newsletter, you can register by ticking the appropriate checkbox under the various forms (e.g. contact form, notification settings) or by completing the corresponding registration form at <https://www.lauterbach.com/newsletter>. Subsequently, you will receive an activation link to the specified e-mail address, which you must activate to complete the registration (so-called double opt-in procedure).

The following data or data categories are collected and processed:

- First name



- Last name
- E-mail address

The legal basis for the processing is Art. 6 (1) lit. a GDPR, i.e. your explicit and voluntary consent in combination with the double opt-in procedure.

You can withdraw your consent at any time and without giving reasons. You have two options to choose from:

You can unsubscribe from future receipt of the newsletter by clicking on the "unsubscribe" button, which can be found in every newsletter.

You can also send an informal email with your unsubscribe request to [datenschutz@lauterbach.com](mailto:datenschutz@lauterbach.com)

For the newsletter mailing as well as the newsletter campaign management we use the email marketing tool CleverReach of CleverReach GmbH & Co. KG, Schafjückenweg 2, 26180 Rastede, Germany.

#### **4. Obligation to provide data**

In general, the provision of the personal data mentioned in section 3 is neither legally nor contractually required. You are not obliged to provide the data. Failure to provide it therefore has no consequences. This only applies if no other information is provided for the respective processing operations.

#### **5. Automated decision-making, including profiling**

Automated decision-making including profiling pursuant to Art. 22 (1) and (4) GDPR do not take place on the part of Lauterbach.

#### **6. Transfer of personal data to a third country**

Data transfers to countries outside the EU and the European Economic Area ("Third Countries") arise in the context of the administration, development and operation of IT systems. The transfer takes place only on the basis:

- of an adequacy decision of the European Commission according to Art. 45 GDPR.
- of an approved certification mechanism pursuant to Art. 42 GDPR together with legally binding and enforceable obligations of the controller or processor in the third country.
- of standard data protection clauses adopted by the Commission pursuant to the examination procedure referred to in Art. 93 Sec. 2 GDPR.

Currently, when using our Customer Portal, a transfer of personal data to third countries takes place through the use of third-party services in the following cases:

- Transfer of data to InnoCraft Ltd. (Matomo), 7 Waterloo Quay PO625, 6140 Wellington, New Zealand

The web pages and protocols are hosted on premises and are located exclusively on servers in Germany.



## 7. Categories of recipients of the personal data and data sources

### 7.1 Categories of recipients of the personal data

For the processing of personal data for the purposes mentioned here, we use the following categories of recipients as processors pursuant to Art. 28 GDPR:

- Providers of marketing and analytics services for websites (Matomo).
- Newsletter Platform (CleverReach)

These service providers process information about you on our behalf and on the basis of our instructions and are contractually bound to comply with applicable data protection laws in accordance with Art. 28 GDPR.

Other recipients are affiliated companies of Lauterbach GmbH. As an international company, we therefore pass on your data, if applicable, to the following affiliated companies:

- Lauterbach Consulting S.A.R.L
- Lauterbach Technologies Co., Ltd
- Lauterbach S.r.l.
- Lauterbach Ltd.
- Lauterbach S.A.R.L.
- Lauterbach Inc.

Your data will also be passed on if we are legally obliged to do so.

### 7.2 Data sources

We received all data from you in connection with the registration and use of our Customer Portal on the website.

## 8. Period for which the personal data will be stored or criteria used to determine that period

Personal data will only be stored as long as necessary to fulfill the purposes mentioned here or as required by the retention periods specified by law. After the respective purpose is fulfilled or after the retention periods have expired, the data will be deleted in accordance with the statutory requirements.

We store your data for advertising purposes until you object to its use, withdraw your consent, or until it is no longer legally permissible to use it. We store your other data for as long as we need it to fulfill the specific purpose (e.g. to fulfill or process a contract) and delete it when the purpose no longer applies.

All connection data (server log files) in the storage of the web server are deleted after a maximum duration of 30 days after the end of the connection (in case we have to analyze connection problems). The anonymized access logs are stored for 30 days. In the event that parts of the server log files are required for the preservation of evidence, these are excluded from deletion until final clarification of the respective incident.

We store the data collected during registration for the time you are registered for the Customer Portal on our website. Your data will be deleted if you cancel your registration. Legal retention periods remain unaffected.



## 9. Your rights as a data subject

Lauterbach GmbH is responsible for processing your data, unless otherwise stated.

You have the right to request from us **access to personal data (Art. 15 GDPR)** and the **rectification of inaccurate personal data (Art. 16 GDPR)**. Furthermore, you have the right to obtain the **erasure of personal data (Art. 17 GDPR)** concerning your person, the right to **restriction of processing (Art. 18 GDPR)** and the right to **receive (Art. 20 GDPR)** the personal data provided to us by you, in a structured, commonly used and machine-readable format.

In addition, you have the right to **object** at any time to the use of your data based on public or legitimate interests (**Art. 21 GDPR**).

Where the processing is based on your given consent you can **withdraw the consent (Art. 7 Sec. 3 GDPR)** at any time. Upon receipt of your withdrawal of consent, we will no longer use or process the data concerned for purposes mentioned in your consent.

If you wish to exercise your rights as a data subject, please send your request to:

Lauterbach GmbH  
Altlaufstraße 40  
85635 Höhenkirchen-Siegertsbrunn  
E-Mail: [datenschutz@lauterbach.com](mailto:datenschutz@lauterbach.com)

## 10. Your right to lodge a complaint with a supervisory authority

Furthermore, you have the right to lodge a complaint with a supervisory authority. The Bavarian State Office for Data Protection Supervision, Postfach 1349, 91504 Ansbach, E-mail: [poststelle@lda.bayern.de](mailto:poststelle@lda.bayern.de), Phone number: +49 (0) 981 180093-0, is generally responsible for us.

Alternatively, you can approach the supervisory authority that is locally responsible for you.

## 11. SSL or TLS encryption

For security reasons and to protect the transmission of confidential content that you send to us as a site operator, our service uses an TLS 1.2 and TLS 1.3 encryption. Thus, data that you submit via this service, is not readable for others.

## 12. Privacy notices for all third-party services implemented on our website

### 12.1. Privacy notice on the use of Matomo (Cloud)

This website uses the open-source web analytics service Matomo. Provider is InnoCraft Ltd., 7 Waterloo Quay PO625, 6140 Wellington, New Zealand. Matomo uses technologies that enable cross-page recognition of the user to analyze user behavior (e.g. device fingerprinting). For this purpose, permanent cookies are stored on your terminal device and read by us. In this way, we are able to recognize and count returning visitors.



With the help of Matomo, we are able to collect and analyze data about the use of our website-by-website visitors. This allows us to find out, among other things, when which page views were made and from which region they come. We also collect various log files (e.g. IP address, referrer, geolocation, main language of the browser, user agent of the browser, date and time of the request, screen resolution used, pages generation time, etc.) and can measure whether our website visitors perform certain actions (e.g. clicks, purchases, site searches, scroll behavior, etc.). The IP address is anonymized before storage. 24 months raw data retention.

The storage of and access to information in the end user's terminal equipment is based on informed consent according to Section 25 (1) TDDDG. The legal basis for the further processing of your personal data is your voluntary and informed consent pursuant to Art. 6 (1) lit. a GDPR. You provide the corresponding consents via the Consent Banner.

For more information on how Matomo Analytics handles user data, please see Matomo's privacy policy: <https://matomo.org/privacy/>

If you have not given consent via the consent banner, we use Matomo exclusively in the cookieless version. As we do not want to completely dispense with web analysis in this case, we have decided to use Matomo without the use of cookies. This is because we can use statistics on website behavior to optimize our service and adapt it to your individual needs.

In particular, personal data (such as the IP address) is then not being processed, but only general information such as the number of visitors to our website, page views, length of stay or search terms used. The cookieless solution of Matomo only group different actions into "visits" during a short window of up to 24 hours.

Furthermore, we do not use any of the methods provided by Matomo to track visitors via fingerprinting either. We have additionally implemented the "DisableBrowser feature" in order to meet the requirements of Section 25 (1) TTDPA in the best possible way. This means that users are also not tracked using browser fingerprinting, which would read information from the user's end device such as browser type, operating system or screen resolution and would therefore require the user's consent. When this method is used, according to Matomo, then no browser features are being accessed and they also aren't used to create the short-lived identifier (similar to a fingerprint). The browser resolution will be also no longer tracked.

You can find additional information about Matomo cookieless tracking here <https://matomo.org/cookie-consent-banners/>

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*This Privacy Policy is subject to constant review and Lauterbach reserves the right to make changes at any time. Such changes will be published here accordingly.*