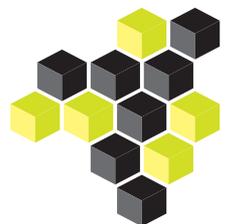


Privacy Policy

20.05.2018



Privacy Policy

We are very delighted that you have shown interest in willms.coaching. Our offer aims to support the development of people, teams and organizations, to enable learning and to grow. For us as professional consultants, trainers and coaches a confidential, safe interaction between client and consultant is an important basis of our work.

You can count on us to treat you fairly and transparently. In no case will we trade in data from people who are in contact with us or who are visitors to our website. We treat information that is communicated to us as part of our business relationship in the strictest confidence. We offer our customers an open and honest approach at all times. The trust of our customers is our highest distinction. In this context, the careful and transparent handling of data in the context of electronic media such as the website of willms.coaching and our newsletter has a particularly high priority.

This privacy policy provides information on the nature, extent and purpose of the personal data collected, used and processed by us. You will also be informed about your rights, which are regulated by the European Data Protection Regulation.

The privacy policy covers the following areas:

- Use of the website www.willmscoaching.de, contact and registration
- Privacy policy in connection with Youtube videos included on our website
- Subscription to our newsletter and newsletter tracking
- Notes on data protection in connection with consulting services, coaching and training
- Storage and routine deletion of the data
- Your rights towards willms.coaching regarding your data

On the website of willms.coaching I offer services that can be provided in part by a network of consultants. Nevertheless, Johannes Willms is always responsible for the use of your personal data. In case of any questions or difficulties, please contact Johannes Willms directly as responsible person.

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1. Data protection in the context of the use of the website of willms.coaching, registration and contact forms.

The use of the Internet pages of the willms.coaching is possible without any indication of personal data;

We dispense with third-party internet services, so-called social media, web tracking services for marketing, external payment services, or the like.

We care about direct, confidential contact with visitors and customers. In no case we use your data for sale to third parties.

The following section clarifies which anonymous data points arise when using the website and how they are processed. In addition, we declare our handling of the personal data that you register during registration, when using the contact form or registering for an event.

Please note: As the controller, willms.coaching has implemented numerous technical and organizational measures to ensure the most complete protection of personal data processed through this website. However, Internet-based data transmissions may in principle have security gaps, so absolute protection may not be guaranteed. For this reason, every data subject is free to transfer personal data to us via alternative means, e.g. by telephone. We are looking forward to a personal conversation.

Collection of general data and information

The website of willms.coaching collects a series of general data and information when a data subject or automated system calls up the website. This general data and information are stored in the server log files.

Collected may be (1) the browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (so-called referrers), (4) the sub-websites, (5) the date and time of access to the Internet site, (6) an Internet protocol address (IP address), (7) the Internet service provider of the accessing system, and (8) any other similar data and information that may be used in the event of attacks on our information technology systems.

When using these general data and information, willms.coaching does not draw any conclusions about the data subject. Rather, this information is needed to (1) deliver the content of our website correctly, (2) optimize the content of our website as well as its advertisement, (3) ensure the long-term viability of our information technology systems and website technology, and (4) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack. Therefore, the willms.coaching analyzes anonymously collected data and information statistically, with the aim of increasing the data protection and data security of our enterprise, and to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by a data subject. Profiling does not take place.

Registration on our website

As a visitor to our website you have the possibility to register on the website with the indication of personal data. If you register, you may have access to additional content such as articles or documents of a workshop attended. Which personal data are transmitted to the controller is determined by the respective input mask used for the registration. The personal data entered by the data subject are collected and stored exclusively for internal use by the controller, and for his own purposes. The controller may request transfer to one or more processors (e.g. a parcel service) that also uses personal data for an internal purpose which is attributable to the controller.

By registering on the website of the controller, the IP address—assigned by the Internet service provider (ISP) and used by the data subject—date, and time of the registration are also stored. The storage of this data takes place against the background that this is the only way to prevent the misuse of our services, and, if necessary, to make it possible to investigate committed offenses. Insofar, the storage of this data is necessary to secure the controller. This data is not passed on to third parties unless there is a statutory obligation to pass on the data, or if the transfer serves the aim of criminal prosecution.

The registration of the data subject, with the voluntary indication of personal data, is intended to enable the controller to offer the data subject contents or services that may only be offered to registered users due to the nature of the matter in question. Registered persons are free to change the personal data specified during the registration at any time, or to have them completely deleted from the data stock of the controller. We are happy to be at your disposal if you request information about which personal data is stored about you. Furthermore, we correct or delete personal data at the request or notice of the person concerned, as far as this does not conflict with any statutory storage obligations.

Contact possibility via the website

The website of willms.coaching contains information that enables a quick electronic contact to our enterprise, as well as direct communication with us, which also includes a general address of the so-called electronic mail (e-mail address). If a data subject contacts the controller by e-mail or via a contact form, the personal data transmitted by the data subject are automatically stored. Such personal data transmitted on a voluntary basis by a data subject to the data controller are stored for the purpose of processing or contacting the data subject. We deal carefully and confidentially with contact requests. There is no transfer of this personal data to third parties.

2. Data protection provisions about the application and use of YouTube

Whenever you visit a video subpage on our website including a video, this section is relevant to you as we integrate videos into our website through the Platform YouTube. YouTube is an Internet video portal that enables

video publishers to set video clips and other users free of charge, which also provides free viewing, review and commenting on them. The operating company of YouTube is YouTube, LLC, 901 Cherry Ave., San Bruno, CA 94066, UNITED STATES. The YouTube, LLC is a subsidiary of Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, UNITED STATES. With each call-up to one of the individual pages of this Internet site, which is operated by the controller and on which a YouTube component (YouTube video) was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to download a display of the corresponding YouTube component. Further information about YouTube may be obtained under <https://www.youtube.com/yt/about/en/>. During the course of this technical procedure, YouTube and Google gain knowledge of what specific sub-page of our website was visited by the data subject. If the data subject is logged in on YouTube, YouTube recognizes with each call-up to a sub-page that contains a YouTube video, which specific sub-page of our Internet site was visited by the data subject. This information is collected by YouTube and Google and assigned to the respective YouTube account of the data subject. YouTube and Google will receive information through the YouTube component that the data subject has visited our website, if the data subject at the time of the call to our website is logged in on YouTube; this occurs regardless of whether the person clicks on a YouTube video or not. If such a transmission of this information to YouTube and Google is not desirable for the data subject, the delivery may be prevented if the data subject logs off from their own YouTube account before a call-up to our website is made. YouTube's data protection provisions, available at <https://www.google.com/intl/en/policies/privacy/>, provide information about the collection, processing and use of personal data by YouTube and Google.

3. Subscription to our newsletters

On the website of the willms.coaching, users are given the opportunity to subscribe to the newsletter of willms.coaching. The input mask used for this purpose determines what personal data are transmitted, as well as when the newsletter is ordered from the controller.

Johannes Willms and willms.coaching informs its customers and business partners regularly by means of a newsletter about enterprise offers. Our interest is that you can read this newsletter with a profit for yourself and we stay in contact over the long term. Our newsletter may only be received by the data subject if (1) the data subject has a valid e-mail address and (2) the data subject registers for the newsletter shipping. A confirmation e-mail will be sent to the e-mail address registered by a data subject for the first time for newsletter shipping, for legal reasons, in the double opt-in procedure. This confirmation e-mail is used to prove whether the owner of the e-mail address as the data subject is authorized to receive the newsletter.

During the registration for the newsletter, we also store the IP address of the computer system assigned by the Internet service provider (ISP) and used by the data subject at the time of the registration, as well as the date and time of the registration. The collection of this data is necessary in order to understand the (possible) misuse of the e-mail address of a data subject at a later date, and it therefore serves the aim of the legal protection of the controller.

The personal data collected as part of a registration for the newsletter will only be used to send our newsletter. In addition, subscribers to the newsletter may be informed by e-mail, as long as this is necessary for the operation of the newsletter service or a registration in question, as this could be the case in the event of modifications to the newsletter offer, or in the event of a change in technical circumstances. There will be no transfer of personal data collected by the newsletter service to third parties. The subscription to our newsletter may be terminated by the data subject at any time. The consent to the storage of personal data, which the data subject has given for shipping the newsletter, may be revoked at any time. For the purpose of revocation of consent, a corresponding link is found in each newsletter. It is also possible to unsubscribe from the newsletter at any time directly on the website of the controller, or to communicate this to the controller in a different way.

Newsletter-Tracking

The newsletter of the willms.coaching contains so-called tracking pixels. A tracking pixel is a miniature graphic embedded in such e-mails, which are sent in HTML format to enable log file recording and analysis. This allows a statistical analysis of the success or failure of online marketing campaigns. Based on the embedded tracking pixel, the willms.coaching may see if and when an e-mail was opened by a data subject, and which links in the e-mail were called up by data subjects.

Such personal data collected in the tracking pixels contained in the newsletters are stored and analyzed by the controller in order to optimize the shipping of the newsletter, as well as to adapt the content of future newsletters even better to the interests of the data subject. These personal data will not be passed on to third parties. Data subjects are at any time entitled to revoke the respective separate declaration of consent issued by means of the double-opt-in procedure. After a revocation, these personal data will be deleted by the controller. Willms.coaching automatically regards a withdrawal from the receipt of the newsletter as a revocation.

Use of the service provider "Campaign Monitor"

The newsletter is distributed via Campaign Monitor, a company newsletter distribution platform: Campaign Monitor Pty Ltd, 404 / 3-5 Stapleton Avenue, Sutherland, NSW, Australia, 2232.

The e-mail addresses of our newsletter recipients, as well as their other information described in these notes, are stored on the Campaign Monitor servers in the United States and, where applicable, Germany and Australia. Campaign Monitor uses this information to send and evaluate the newsletters on our behalf. Furthermore, Campaign Monitor may, according to its own information, use this data to optimize or improve its own services, e.g. for the technical

optimization of the shipping and the presentation of the newsletter or for economic purposes, to determine from which countries the recipients come. However, Campaign Monitor does not use the data of our newsletter recipients to address them themselves or to pass them on to third parties.

We rely on the reliability, IT and data security of Campaign Monitor. Campaign Monitor has undertaken to comply with the provisions of the GDPR and has taken extensive internal measures to ensure this.

See Details:

<https://www.campaignmonitor.com/trust/gdpr-compliance/>. The measures taken to secure the data can be viewed here:

<https://www.campaignmonitor.com/trust/security/>.

4. Information on data protection in connection with consulting services, coaching and training

Within the framework of agreed consulting services, coaching, trainings and projects within the framework of organizational development, numerous data are generated, which we process as part of the consultant-client relationship. This is already the case when initiating a consulting relationship before an oral or written contract. The confidential treatment of this data in the context of the consultant-client relationship is the central basis of our work. Within the scope of the desired services we clarify the protection of the data and also offer the persons concerned the possibility to delete this data at any time.

5. Routine erasure and blocking of personal data

The data controller shall process and store the personal data of the data subject only for the period necessary to achieve the purpose of storage, or as far as this is granted by the European legislator or other legislators in laws or regulations to which the controller is subject to.

If the storage purpose is not applicable, or if a storage period prescribed by the European legislator or another competent legislator expires, the personal data are routinely blocked or erased in accordance with legal requirements.

6. Your rights towards willms.coaching regarding your data

In this section, we will generally inform about your rights to data processing at willms.coaching and refer to the respective legal basis. First, you will be informed about your rights, then certain terms will be described.

Essentially, it's about having a full right to get displayed what data I process from you, to limit that processing to your liking, or to have your data completely deleted in our directories. Please contact me directly if you have any questions.

Right of confirmation

Each data subject shall have the right granted by the European legislator to obtain from the controller the confirmation as to whether or not personal data concerning him or her are being processed. If a data subject wishes to avail himself of this right of confirmation, he or she may, at any time, contact any employee of the controller.

Right of access

Each data subject shall have the right granted by the European legislator to obtain from the controller free information about his or her personal data stored at any time and a copy of this information. Furthermore, the data subject shall have a right to obtain information as to whether personal data are transferred to a third country or to an international organisation. Where this is the case, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer.

If a data subject wishes to avail himself of this right of access, he or she may, at any time, contact any employee of the controller.

Right to rectification

Each data subject shall have the right granted by the European legislator to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

If a data subject wishes to exercise this right to rectification, he or she may, at any time, contact any employee of the controller.

Right to erasure (Right to be forgotten)

Each data subject shall have the right granted by the European legislator to obtain from the controller the erasure of personal data concerning him or her without undue delay, and the controller shall have the obligation to erase personal data without undue delay if certain reasons apply. In any case, I assure you the deletion of your data, with the exception of my own obligation to provide documentation as part of my business activities with the tax office. If you want your data to be deleted from us, please let us know. I arrange the deletion immediately.

Right of restriction of processing

Each data subject shall have the right granted by the European legislator to obtain from the controller restriction of processing. Of course, we meet your wishes here. Please inform us so that we can find the best solution for you in case of a problem.

Right to data portability

Each data subject shall have the right granted by the European legislator, to receive the personal data concerning him or her, which was provided to

a controller, in a structured, commonly used and machine-readable format.

In order to assert the right to data portability, the data subject may at any time contact Johannes Willms.

Right to object

Each data subject shall have the right granted by the European legislator to object, on grounds relating to his or her particular situation, at any time, to processing of personal data concerning him or her, which is based on point (e) or (f) of Article 6(1) of the GDPR. This also applies to profiling based on these provisions.

Johannes Willms shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.

If the willms.coaching processes personal data for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing. This applies to profiling to the extent that it is related to such direct marketing. If the data subject objects to the willms.coaching to the processing for direct marketing purposes, the willms.coaching will no longer process the personal data for these purposes.

In addition, the data subject has the right, on grounds relating to his or her particular situation, to object to processing of personal data concerning him or her by the willms.coaching for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1) of the GDPR, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

In order to exercise the right to object, the data subject may contact any employee of willms.coaching. In addition, the data subject is free in the context of the use of information society services, and notwithstanding Directive 2002/58/EC, to use his or her right to object by automated means using technical specifications.

Automated individual decision-making, including profiling

Each data subject shall have the right granted by the European legislator not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) is not authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or (3) is not based on the data subject's explicit consent. If the decision (1) is necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) it is based on the data subject's explicit consent, Johannes Willms shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human

intervention on the part of the controller, to express his or her point of view and contest the decision.

If the data subject wishes to exercise the rights concerning automated individual decision-making, he or she may, at any time, contact any employee of the willms.coaching.

Right to withdraw data protection consent

Each data subject shall have the right granted by the European legislator to withdraw his or her consent to processing of his or her personal data at any time.

If the data subject wishes to exercise the right to withdraw the consent, he or she may, at any time, contact any employee of willms.coaching.

7. Legal basis for the processing

Art. 6(1) lit. a GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as is the case, for example, when processing operations are necessary for the supply of goods or to provide any other service, the processing is based on Article 6(1) lit. b GDPR. The same applies to such processing operations which are necessary for carrying out pre-contractual measures, for example in the case of inquiries concerning our products or services. Is our company subject to a legal obligation by which processing of personal data is required, such as for the fulfillment of tax obligations, the processing is based on Art. 6(1) lit. c GDPR. In rare cases, the processing of personal data may be necessary to protect the vital interests of the data subject or of another natural person. This would be the case, for example, if a visitor were injured in our company and his name, age, health insurance data or other vital information would have to be passed on to a doctor, hospital or other third party. Then the processing would be based on Art. 6(1) lit. d GDPR. Finally, processing operations could be based on Article 6(1) lit. f GDPR. This legal basis is used for processing operations which are not covered by any of the abovementioned legal grounds, if processing is necessary for the purposes of the legitimate interests pursued by our company 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. Such processing operations are particularly permissible because they have been specifically mentioned by the European legislator. He considered that a legitimate interest could be assumed if the data subject is a client of the controller (Recital 47 Sentence 2 GDPR).

8. The legitimate interests pursued by the controller or by a third party

Where the processing of personal data is based on Article 6(1) lit. f GDPR our legitimate interest is to carry out our business in favor of the well-being of all our employees and the shareholders.

9. Provision of personal data as statutory or contractual requirement; Requirement necessary to enter into a contract; Obligation of the data subject to provide the personal data; possible consequences of failure to provide such data

We clarify that the provision of personal data is partly required by law (e.g. tax regulations) or can also result from contractual provisions (e.g. information on the contractual partner). Sometimes it may be necessary to conclude a contract that the data subject provides us with personal data, which must subsequently be processed by us. The data subject is, for example, obliged to provide us with personal data when our company signs a contract with him or her. The non-provision of the personal data would have the consequence that the contract with the data subject could not be concluded. Before personal data is provided by the data subject, the data subject must contact any employee. The employee clarifies to the data subject whether the provision of the personal data is required by law or contract or is necessary for the conclusion of the contract, whether there is an obligation to provide the personal data and the consequences of non-provision of the personal data.

10. Definitions

The data protection declaration of willms.coaching is based on the terms used by the European legislator for the adoption of the General Data Protection Regulation (GDPR). Our data protection declaration should be legible and understandable for the general public, as well as our customers and business partners. To ensure this, we would like to explain the terminology used. In this data protection declaration, we use, inter alia, the following terms:

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.

Data subject

Data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

Processing

Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Restriction of processing

Restriction of processing is the marking of stored personal data with the aim of limiting their processing in the future.

Profiling

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

Pseudonymisation

Pseudonymisation is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

Controller or controller responsible for the processing

Controller or controller responsible for the processing is 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; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

Processor

Processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

Recipient

Recipient is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

Third party

Third party is a natural or legal person, public authority, agency or body

other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

Consent

Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

This Privacy Policy has been generated by the Privacy Policy Generator of the German Association for Data Protection that was developed in cooperation with Privacy Lawyers from WILDE BEUGER SOLMECKE, Cologne.