

# Privacy Policy Social Media

## 1. Data Controller

Thank you for your interest in the services of justETF GmbH, Seitzstr. 8e, 80538 Munich. E-mail: [support@justetf.com](mailto:support@justetf.com), registered in the Commercial Register of the Local Court of Munich under HRB 292557 ("justETF GmbH"). In the following, we would like to inform you about the collection, processing and use of personal data (collectively "data processing") in the context of the use of our Social Media pages.

justETF operates its own social media pages together with the operators of the following social media platforms:

- **Facebook** (Facebook Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland) for the Facebook page at <https://www.facebook.com/justetf>
- **Instagram** (Instagram LLC, 1601 Willow Road, Menlo Park, CA 94025, USA) for our Instagram page at <https://www.instagram.com/justetf.de>
- **LinkedIn** (if you are located within the European Union, the European Economic Area and Switzerland LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2 Ireland; if you are located outside the European Union, the European Economic Area and Switzerland LinkedIn Corporation, 1000 W. Maude Avenue, Sunnyvale, CA 94085, USA) for the LinkedIn page at <https://www.linkedin.com/company/justetf>
- **TikTok** (TikTok Technology Limited, 10 Earlsfort Terrace, Dublin, D02 T380, Ireland) for our profile at <https://www.tiktok.com/@justetf>
- **X** (X Corp, 1355 Market Street, Suite 900, San Francisco, CA 94103, United States) for the X profile at <https://x.com/justetf>
- **YouTube** (operated by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland) for the YouTube page at <https://www.youtube.com/justetf>

Please note that the operator of the respective Social Media platform on which our Social Media pages are operated is itself responsible for the processing of the personal data that is collected when these are used. Further information on the processing of your personal data by the operator of the respective Social Media platform can be found in section 2.2.

## 2. Processing of your Personal Data

### 2.1 Processing of your Personal Data by justETF

As the operator of the Social Media site, we process your actions and interactions when you visit it. For example, we collect the content of your messages, posts or comments that

you either send to us directly or leave on our site, as well as when you like or share posts. Depending on your profile settings, which you can adjust yourself in your settings on the Social Media platform, we process your publicly visible profile data such as your name, your profile picture and other information such as your profile description. Please note that we generally advise against transmitting or sharing sensitive data or confidential information (e.g. contract data, bank details) via Social Media platforms. Please use a secure transmission channel, e.g. letter post or e-mail.

On our social media pages, we process the aforementioned data to provide information about our company and our services, as well as to communicate with our followers and interested parties (pursuant to Art. 6 (1) (f) GDPR). We also use these channels to respond to your messages, requests, posts or comments that you send to us (Art. 6 (1) (b) GDPR).

Depending on the operator of the Social Media platform, they provide us with anonymous usage statistics or page insights data of our Social Media pages based on the actions and interactions of our followers with them. These statistics include, for example, likes, the sharing of posts, comments, etc., the number of followers, views of individual page areas, the reach of a post and statistics on followers by age, language, origin or interests.

We use this information to get in touch with our followers and interested parties, to analyse the use and reach of our posts, to evaluate content and to design our Social Media pages to be as target group-oriented as possible.

The creation of these usage statistics and the processing of the underlying data is carried out under the sole responsibility of the operator of the respective social media platform and without us being able to view personal data of individual followers or users. The processing is carried out on the basis of our aforementioned legitimate interests pursuant to Art. 6 (1) (f) GDPR. We also use these anonymous usage statistics to target interest-based advertising within and outside the respective social media platforms. If you have an account with the respective social network, the interest-based advertising can be displayed on all devices on which you are or were logged in. This data processing is carried out on the basis of our aforementioned legitimate interests pursuant to Art. 6 (1) (f) GDPR. If, in the context of interest-based advertising, we were to carry out an extended comparison with customer lists to be uploaded by us to the respective social media platform, this would be done exclusively on the basis of consent granted by you for this purpose (Art. 6 (1) (a) GDPR). Your personal data will be processed for as long as necessary for the aforementioned purposes. In the event of an objection to processing based on our legitimate interests (Art. 6 (1) (f) GDPR), we will delete personal data unless its further processing is permitted under the relevant legal provisions. We also delete personal data if we are obliged to do so for other legal reasons. As a rule, we delete personal data immediately after the legal basis ceases to exist, if it is no longer required for the stated purposes or if the stated purposes cease to exist and if there is no other legal basis (e.g. retention periods under commercial and tax law).

## 2.2 Processing of your Personal Data by the operator of the respective Social Media platform

Please note that the operator of the respective social media platform is solely responsible for the processing of personal data on the platform on which we operate our social media pages. The operator of the platform usually processes personal data of you through your visit to one of our social media pages regardless of whether you have a user account on the respective social media platform or are logged in on the respective social media platform. Please note that, as a rule, cookies and other storage and, in some cases, cross-device tracking technologies are also used. Personalized usage statistics may be created, for example, for our own market research, advertising, other commercial or business purposes, and personal data may also be processed outside the European Union in the process. We have no influence on or access to these processing operations.

Further information on the processing of your personal data by the operator of the respective social media platform can be found in the information on data protection on the following websites of the respective social media platform

- Facebook privacy policy at <https://www.facebook.com/policy>
- LinkedIn privacy policy at [https://www.linkedin.com/legal/privacy-policy?trk=homepagebasic\\_footer-privacy-policy](https://www.linkedin.com/legal/privacy-policy?trk=homepagebasic_footer-privacy-policy)
- YouTube Privacy Policy (operated by Google Ireland Limited) at <https://policies.google.com/privacy?hl=en-GB>
- Instagram privacy policy at <https://help.instagram.com/519522125107875>
- X Privacy Policy at <https://twitter.com/en/privacy>
- TikTok privacy policy at <https://www.tiktok.com/legal/page/eea/privacy-policy/en>

## 3. Your rights

### Right to access

You have the possibility to request information about the data stored about you, its origin, recipients or categories of recipients to whom the data is disclosed, as well as the purpose of the storage. (Art. 15 GDPR)

### Right to rectification

You have a right to rectification and/or completion vis-à-vis the controller if the personal data processed concerning you are inaccurate or incomplete. (Art. 16 GDPR).

### **Right to deletion**

You can demand that we delete the personal data relating to you without delay. However, there is no right to deletion if legal, supervisory or other sovereign storage obligations are opposed or the storage serves the assertion, exercise or defense of legal claims. (Art. 17 GDPR)

### **Right to restriction of processing**

You may, under certain conditions (disputed accuracy, unlawful processing, cessation of the purpose of processing or lodging an objection), request the restriction of the processing of personal data concerning you. (Art. 18 GDPR)

### **Right to data transfer**

You have the right to receive the personal data concerning you that you have provided to us in a structured, common and machine-readable format. (Art. 20 GDPR)

### **Right to object**

You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you which is processed on the basis of Article 6(1)(e) or (f) EU GDPR. We will then no longer process your data unless there are compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or the processing is for the establishment, exercise or defence of legal claims. (Art. 21 GDPR)

### **Right to complain to the supervisory authority**

Pursuant to Art. 77 GDPR, you have the right to complain to a supervisory authority if you are of the opinion that the processing of personal data is not carried out lawfully. The address of the supervisory authority responsible for our company is: Bayerisches Landesamt für Datenschutzaufsicht (BayLDA), Postfach 1349, 91504 Ansbach, phone: +49 (0) 981 180093-0, e-mail: [poststelle@lda.bayern.de](mailto:poststelle@lda.bayern.de)

## **4. Your contact persons**

### **Contact person for the exercise of your rights**

For the exercise of your rights and further information, please contact justETF GmbH, Seitzstr. 8e, 80538 Munich, by e-mail to [privacy@justetf.com](mailto:privacy@justetf.com) or by letter.

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