

PRIVACY POLICY STATEMENT

The use of our website is possible without providing personal information. The owner and operator of this website is Die Wiener Volkshochschulen GmbH with its registered office in Vienna and its business address at 1090 Vienna, Lustkandlgasse 50, registered in the commercial register of the Commercial Court of Vienna under FN 304196y (hereinafter referred to as "VHS").

For the use of individual services of our website, different regulations may apply, which in this case are explained separately below. Your personal information (e.g. name, address, email, telephone number) will only be processed by us in accordance with the provisions of Austrian and European data protection legislation. Information is personal if it can be clearly assigned to a specific natural person. No personal information is collected automatically.

The following provisions are, therefore, to inform you about the type, scope, and purpose of the collection, use and processing of personal information by VHS.

1. Course booking

- 1.1. Every course or event booking is a conclusion of a contract. By booking a course or event, you agree to the General Terms and Conditions and this Privacy Policy of VHS and thus grant your consent to the electronic processing of necessary personal information. When booking a course or event for a third party, you confirm that you have been commissioned and authorized by this third party to process information within the scope of the entries you have made (i), to forward the information to Die Wiener Volkshochschulen GmbH (ii) and to consent to the processing of information (iii) within the scope of the data protection statement by Die Wiener Volkshochschulen GmbH. Furthermore, you confirm that all information provided is correct and that you will fully indemnify and hold VHS harmless in the event of incorrect, false, incomplete, or improper provision of information. Notwithstanding the foregoing, VHS will process all information only to the extent necessary for the proper establishment and execution of the contractual relationship with you or a third party (for whom you book the course).

(hereinafter referred to as "**personal information**").

- 1.2. By booking a course or an event, you grant your consent to the electronic processing of the following personal information required for the course booking:

- Salutation, title, first and last name, gender, residential address
- Date of birth, telephone number, email address for bookings via the website
- Citizenship, social group, highest completed school education for statistical purposes.
- For courses within the context of Förderung 2.0 (Wiener Lernhilfe: school type and school location)

We use the tool "Zoom" for the implementation of video conferences, webinars, and online course units. For the use of online or digital content (e.g. video chats, webinars, etc.), the following information is processed:

Internet Protocol (IP) addresses, browser types, Internet Service Provider (ISP), image and audio data, referring/exit pages, files displayed on Zoom's website (e.g. HTML pages, graphics, etc.), operating systems, date/time stamp and/or clickstream data.

- 1.3. We use "Zoom" to deliver online courses and webinars. If we intend to record course sessions and webinars, we will transparently inform you in advance and ask for your consent. The fact of recording will also be displayed to you in the Zoom app. In the case of webinars, we may also process questions asked by webinar participants for the purpose of recording and following up on webinars.
- 1.4. The information is collected for the sole purpose of registering and managing course participants for the courses offered by VHS and in pseudonymized form for the statistical evaluation of courses, but, in any case, exclusively serves the operational purpose of VHS. The information collected within the scope of course registration will be treated confidentially and processed only to the extent necessary for participant administration, registration, and statistical evaluation in pseudonymized form and stored for as long as necessary for the fulfillment of the administrative tasks of VHS, but not exceeding 10 (ten) years.
- 1.5. For statistical purposes, personal information is processed in a pseudonymization or anonymization process without reference to individuals.
- 1.6. By booking a course or event, you agree to the personal information collected being forwarded to the respective course instructor. VHS commissions external service providers to process and secure your personal information. VHS remains responsible for the protection of your personal information. VHS works with the following external processors:
 - Koschier Software-Development GmbH, Fernkorngasse 10, 1100 Vienna
 - WH IT Services GmbH, Reichsratsstraße 11, 1010 Vienna
 - BMD Systemhaus GmbH, Sierningerstr. 190, 4400 Steyr
 - KSV1870 Holding AG, 1120 Vienna, Wagenseilgasse 7, in the event of a default in payment.
 - ABSS interactive GmbH, Schönbrunner Str. 75/1/9, 1050 Vienna
 - Zoom Video Communications, Inc. and its subsidiaries, San Jose - Headquarters; 55 Almaden Boulevard, 6th Floor, San Jose, CA 95113.

Zoom complies with the data protection guarantees pursuant to Article 44 et seq. of the GDPR by guaranteeing an adequate level of data protection through the conclusion of the so-called EU standard data protection clauses, which Zoom has concluded with VHS. In addition, we have concluded a data protection agreement ("data processing addendum") with Zoom Video Communications, Inc. This is a contract in which Zoom Video Communications, Inc. undertakes to protect the personal information of our users, to process it on our behalf in accordance with data protection regulations and not to disclose it with third parties.

- 1.7. VHS conducts telephone surveys at regular intervals to measure customer satisfaction and to optimize and expand course offer for our customers. In individual cases, personal information is disclosed with external service providers for the purpose of conducting the survey. In these cases, in addition to confidentiality agreements, we also conclude contracts on commissioned processing in accordance with legal requirements with external service providers and monitor compliance with them. In this manner, we ensure that the information is only used for the agreed purpose and is not used without authorization. Our service providers are subject to a deletion period of 6 months. The data processing is carried out on the legal basis of our legitimate interest (Art. 6 Sec. 1(f) GDPR).
- 1.8. Without further express written consent, your information will not be disclosed beyond this, and no personal evaluations will be created.

- 1.9. Personal information will be stored for a maximum of 10 years after termination of the contractual relationship. They will be deleted after 7 years at the earliest (tax retention obligation). Exceptions apply (i) if other legal retention obligations provide for longer retention or (ii) for courses whose successful completion is confirmed with a certificate or report. Information is only stored for longer periods in the event of pending legal disputes or if legal retention obligations prevent deletion.

2. Cookies

- 2.1. In order to make our website user-friendly and to enable the use of certain functions, we use the so-called cookies on our website. These are small text files that are stored on your terminal device and store certain settings and data for exchange with our system via your browser.
- 2.2. We use cookies which are deleted at the end of a browser session (session cookies), as well as cookies that are stored on your terminal and allow us to recognize your browser the next time you visit (persistent cookies).
- 2.3. Please note that certain cookies are already set as soon as you enter our website and cookies may also contain personal data. By confirming the cookie notice displayed to you during your first visit to our website, you consent to the use and processing of cookies in accordance with this agreement.
- 2.4. You can set your browser so that you are informed about the setting of cookies and decide individually about their acceptance or exclude the acceptance of cookies for certain cases or generally. In addition, you have the option of deleting the stored cookies via your browser. It should be noted that the functionality of our website may be limited if cookies are not accepted.
- 2.5. Below you will find information about the cookies we use:
- Necessary cookies: These are mandatory for the operation of our website (e.g. cookies that allow you to log in to the MyVHS area and book courses).
 - Analytical cookies/statistics. With these cookies we have the possibility to collect anonymized data about the usage behavior of visitors to our website and serve exclusively to improve the functionality of the website.
 - Functional Cookies/Preferences. These cookies are used for certain functionalities of our website, e.g. to suggest a better navigation flow on our website, to show you personalized and relevant information (e.g. "interest-based advertisements").
 - Targeting Cookies/Marketing. These cookies record your visit to our website, the pages you have visited and the links you have executed. We will use this information to tailor our website and the advertising you see to your interests.

3. Newsletter

- 3.1. We offer you on our site the possibility to subscribe to our newsletter. With this newsletter we inform you about our offers in regular intervals. To receive our newsletter, you need a valid email address. With your registration to our newsletter, we will save your IP address and the date and time of your registration. This serves as a safeguard for us in the event that a third party misuses your email address and subscribes to our newsletter without your knowledge. No other data is collected on our part. The data collected in this way is used exclusively for receiving our newsletter. It will not be passed on to third parties. The data collected in this way is also not compared with data that may be collected by other components of our site. You can cancel your subscription to this newsletter at any time. Details of this can be found in the confirmation email and in each individual newsletter.

- 3.2. The registration for our newsletter is done in a double opt-in process. After registering for the newsletter, you will receive an email asking you to confirm your registration. This confirmation is necessary so that no one can register with somebody else's email address.
- 3.3. We use the product Rapidmail to send our newsletter. Rapidmail is a service of the company Rapidmail GmbH, Augustinerplatz 2, 79098 Freiburg i.Br., Germany. Your data stored during the newsletter registration (e-mail address, name, IP address, date, and time of your registration) are transferred to a server in the Federal Republic of Germany, in a member state of the European Union or in another contracting state of the Agreement on the European Economic Area and stored there in compliance with the Data Protection Act. In addition, we have concluded a data protection agreement with Rapidmail. This is a contract in which Rapidmail undertakes to protect the data of our users, to process it on our behalf in accordance with the data protection provisions and, in particular, not to disclose it with third parties.
- 3.4. Rapidmail uses this data to send and evaluate the newsletter on our behalf. Rapidmail does not use the data of our newsletter recipients to write to them itself or to disclose them with third parties.
- 3.5. To subscribe to the newsletter, the following data are mandatory:
 - Email address
 - First and last name

The specification of title, first and last name as well as the VHS location only serves to personalize the newsletter. Furthermore, we ask you (also optional) to enter your date of birth, gender, and the industry in which you work. We use this information only to tailor the content of the newsletter to your interests.

- 3.6. The newsletters contain so-called "tracking pixels", a pixel-sized file that is retrieved from Rapidmail's server when the newsletter is opened. As part of this retrieval, technical information, such as information about the browser and your system, as well as your IP address and time of retrieval are collected. This information is used for the technical improvement of the services based on the technical data or the target groups and their reading behavior based on their retrieval locations (which can be determined with the help of the IP address) or the access times. The statistical surveys also include the determination of whether the newsletters are opened, when they are opened, and which links are clicked. For technical reasons, this information can be assigned to the individual newsletter recipients, but it is neither our intention nor that of Rapidmail to observe individual users. The analyses serve us much more to recognize the reading habits of our users and to adapt our content to them or to send different content according to the interests of our users.
- 3.7. There are cases where we direct newsletter recipients to Rapidmail's websites. For example, our newsletters contain a link that allows newsletter recipients to access the newsletter online (e.g., in case of display problems in the email program). Furthermore, newsletter recipients can subsequently correct their data, such as the email address. Likewise, Rapidmail's privacy policy is only available on their website.
- 3.8. You can cancel the receipt of our newsletter at any time, i.e. revoke your consent. This will also terminate your consent to the sending of the newsletter via Rapidmail and the statistical analyses. Unfortunately, it is not possible to separately revoke the sending of the newsletter via Rapidmail or the statistical analysis. You will find a link to cancel the newsletter at the end of each newsletter.
- 3.9. We would also like to point out that you can object to the future processing of your personal information in accordance with the legal requirements pursuant to Art. 21 GDPR at any time. The objection can be made in particular against the processing for purposes of direct marketing. We would like to point out that you have the right to correct incorrect data or delete personal information, provided that this claim does not conflict with a legal obligation to retain data.

4. Matomo (with anonymization function)

- 4.1. We use the open-source web analytics service Matomo, from InnoCraft, 7 Waterloo quay P0625, 6140 Wellington, New Zealand (hereinafter referred to as "Matomo"). Matomo stores cookies on your terminal device, which allow an analysis of the use of our website. The information collected in this way is stored exclusively on our server. We collect the following data: two bytes of the IP address of the calling system of the visitor, the web page called up, the website from which the visitor reached the web page called up (referrer), the time spent on the web page and the frequency with which the web page is called up. We use Matomo to analyze the use of our website and individual functions and offers in order to continuously improve the user experience. Through the statistical evaluation of user behavior, we optimize our offerings for visitors. The information generated by the cookie about the use of this website will not be disclosed to third parties.
- 4.2. Matomo uses "cookies"; the information generated by cookies, for example time, place and frequency of your website visits including your IP address, is transmitted to the VHS server and stored there.
- 4.3. Our website uses Matomo with the setting "Anonymize Visitors' IP addresses". This means that IP addresses are processed in a shortened form, thus excluding a direct reference to a person. The software is set so that the IP addresses are not stored in full, but 2 (two) bytes of the IP address are hidden (e.g. 192.168.xxx.xxx). In this way, an assignment of the shortened IP address to the calling computer is no longer possible. The IP address transmitted by your browser via Matomo is not combined with other data collected by us in connection with a course booking.
- 4.4. Matomo will, according to its own information, in no case connect your IP address with other data from Matomo. You may refuse the use of cookies by selecting the appropriate settings on your browser; however, please note that if you do this, you may not be able to use the full functionality of this website.
- 4.5. By using our website, you expressly consent to the use of Matomo and the use of your data described in this point 4.

5. Social media

5.1. YouTube

We operate a YouTube channel whose videos are also embedded on our website. The YouTube services are provided to you by YouTube LLC, USA, which is located at 901 Cherry Ave, San Bruno CA 94066. YouTube, LLC is a subsidiary of Google Inc, 1600 Amphitheatre Pkwy, Mountain View, CA 94043- 1351, USA.

Through this channel we provide you with free video clips. If you have not agreed to the marketing cookies, you will not be able to watch the embedded YouTube videos and no data will be transferred to YouTube. If you have agreed to all cookies, when you load a page with embedded YouTube video, YouTube will receive the information that you have accessed a subpage of our website and played the video. YouTube is informed which of our pages you have visited, and the following information is transmitted: IP address, cookie ID, address of the page called up on our website, language setting of your browser, date and time of the call-up as well as identification of your browser. This occurs regardless of whether YouTube provides a user account through which you are logged in or whether there is no user account. If you are logged in to Google, your data will be directly assigned to your account. Further information on the purpose and scope of data collection and processing by YouTube can be found in the privacy policy. There you will also find more information about your rights and settings options to protect your privacy:

<https://www.google.de/intl/de/policies/privacy>.

5.2. Facebook and Instagram

VHS also operates a Facebook and Instagram fan page. Instagram is an online service for sharing photos and videos that belongs to Facebook. We use plug-ins from the provider Facebook.com, which are provided by the company Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. Some of our pages contain buttons from social media networks (such as Facebook and Twitter), which you can use to recommend our website to others and share content on your personal social media account. These functions are identified by icons (e.g. "Facebook" and "Twitter" button). If you click on such a button, the following data may be transmitted to the respective operator of the social network. IP address, browser information and operating system, screen resolution, installed browser plugins, country of the assigned IP address and URL of the current page. The respective social network may thereby associate your usage behavior with your personal social media account. For further information regarding the use of data by Facebook, please refer to the data protection regulations on Facebook. <https://www.facebook.com/legal/terms/dataprocessing>.

In cases (e.g., the "Facebook Insights" feature) where we are jointly responsible with Facebook for the processing, you will find the main content of the joint processing your data here: https://www.facebook.com/legal/terms/page_controller_addendum

For more information on the collection and use of data by Facebook, as well as your rights in this regard and options for protecting your privacy, please refer to Facebook's privacy policy at <https://www.facebook.com/privacy/explanation>

When you visit our Instagram page, Instagram and the associated company Meta collect, among other things, your IP address and other information. This information is used, among other things, to provide us as the operator of the Instagram pages with statistical information about the use of the Instagram page. More detailed information on this is available from Instagram/Meta at the following link: https://help.instagram.com/519522125107875?helpref=page_content

The data you enter on our social media pages (Facebook and Instagram), such as comments, videos, pictures, likes, public messages, etc., will be published by the social media platforms and will not be used or processed by us for other purposes without first obtaining your consent. We reserve the right to delete content if necessary. If necessary, we share your content on our social media channels if this is permitted by a function of the respective social media platform.

We are also happy to communicate with you via our social media channels. This data processing is done in the interest of our public relations and communication.

6. OpenStreetMaps

We use the open-source map service for the display of geo-data "OpenStreetMaps" by the company OpenStreetMap Foundation, J32 Maney Hill Road, Sutton Coldfield, West Midlands, B72 7JU, United Kingdom. OSM is used to provide an interactive map on our website that shows you how to find and reach us. This service enables us to present our website in an appealing way by loading map material from an external server. The following data is transferred to the OSM servers during the display. The website you have visited and the IP address of your terminal device.

7. Revocation and other rights in relation to data processing

- You can revoke the consent given to us to process your personal information at any time in writing (by email or letter). In addition, you have the right to:
- Access the personal information we have collected.
- Rectification: You have the right to request that we rectify any inaccurate or incomplete personal information relating to you without undue delay.
- Deletion: You may request that we delete your personal information, provided that no pending legal disputes or retention obligations prevent deletion.
- Restrict the personal information we process if
 - you dispute the accuracy of the information
 - or the processing is unlawful, and you object to deletion because
 - you need this information to assert or defend legal claims or you have objected to the processing of your data
- Transfer your personal information in a common machine-readable format to a third party
- Object: You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal information concerning you.
- If you believe that the processing of your information violates data protection law or that your data protection rights have otherwise been violated in any way, you can complain to the supervisory authority. In Austria, this is the data protection authority (www.dsb.gv.at).

All rights can be asserted against us in writing to the contact address under point 4 (letter or email). Please note that, when asserting rights in relation to your personal data, we may require additional information confirming your identity. This serves to protect your rights and privacy.

8. Contact

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1090 Wien
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