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Privacy Policy for our Social Media Channels

Group Data Protection Office

September 2025

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Content

1 Controller 2

2 Data Protection Officer 3

3 Recipients or categories of recipients 3

4 Contacting and interactions 4

5 Information about the processing of your personal data at the respective social media platform 5

5.1 X Page (formerly Twitter) 5

5.2 LinkedIn Page 6

5.3 Xing Page 7

6 Processing outside oft he European Union 8

7 Sources of personal data in case of third-party collection 8

8 Automated decision making 8

9 Data subject rights 9

We, kloeckner.i GmbH (hereinafter also "Klöckner", "we" or "us"), take the protection of personal data and its confidential treatment very seriously. We therefore hereby inform you about the processing of your personal data and the rights to which you are entitled when you visit our online presence on social media channels.

When you visit our profiles, your personal data is collected, used and stored not only by us, but also by the operators of the respective social network. This happens even if you yourself do not have a profile on the respective social network. The individual data processing operations and their scope differ depending on the operator of the respective social network and they are not necessarily traceable for us.

The information in this data protection information relates to the processing of your personal data in connection with your visit to our online presence, insofar as this is carried out by us.

1 Controller

The controller in the sense of data protection law is:

kloeckner.i GmbH
Ackerstraße 14-15
D-10115 Berlin
info-kci@kloeckner.com

For the data processing on the listed social media platforms, we and subsequent operators are jointly responsible in the sense of Art. 26 GDPR:

- **LinkedIn**: joint controller and (for some functions) processor is LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland. You can view the privacy policy for LinkedIn at https://www.linkedin.com/legal/privacy-policy?_l

2 Data Protection Officer

You can contact our Data Protection Office using the following contact details:

Kloeckner.i GmbH
Data Protection Office
Ackerstraße 14-15
G-10115 Berlin
dataprivacy@kloeckner.com

3 Recipients or categories of recipients

Internally, only those departments and employees working there who need access to your personal data to fulfill the purposes stated here have access to it.

Externally, the following recipients/categories of recipients have access to your data:

- Data Processors that we use to provide services.
- Public bodies: Authorities and state institutions, such as public prosecutors' offices, courts or tax authorities, to which we may transfer personal data in individual cases if and to the extent that there is a legal basis for this in the individual case, in particular an obligation.
- Operators of the social media platforms used:
  - **X (formerly Twitter)**: independent controller and (for some functions) processor is X Corp., 865 FM 1209, Building 2, Bastrop, Texas 78602 US (for persons living outside the European Union, EFTA countries, or the United Kingdom), or X Internet Unlimited Company, One Cumberland Place, Fenian Street, Dublin 2 D02 AX07, Ireland (for persons living within the European Union, EFTA countries, or the United Kingdom). You can view the privacy policy for X at https://x.com/en/privacy.
  - **Xing**: independent controller is New Work SE, Am Strandkai 1, 20457 Hamburg, Germany. You can view the privacy policy for Xing at https://privacy.xing.com/en.
  - **LinkedIn**: joint controller and (for some functions) processor or own controller is LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland.

You can view the privacy policy for LinkedIn at https://www.linkedin.com/legal/privacy-policy?_l.

You can contact the data protection officers of the respective social media providers at:

- **X**: X Internet Unlimited Company, Attn: Data Protection Officer, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07 Ireland, or at the link: https://twitter.ethicspointvp.com/custom/twitter/forms/data/form_data.asp.
- **LinkedIn**: LinkedIn Ireland Unlimited Company, Attn: Data Protection Officer, Wilton Place, Dublin 2, Ireland, or at the link: https://www.linkedin.com/help/linkedin/ask/TSO-DPO.
- **Xing**: New Work SE, Attn: Data Protection Officer, Am Strandkai 1, 20457 Hamburg, Germany, or by email to Datenschutzbeauftragter@new-work.se.

4 Contacting and interactions

We process your personal data when you contact us via our online presence by using the functions provided for this purpose (e.g. by creating your own posts, responding to one of our posts or by sending us private messages) or by retrieving the content provided by us (e.g. videos, images).

If you contact us in this way, we process your personal data that is directly visible in this process (usually: username, profile picture, message content, date and time of interaction; For applicants, additionally the information contained in the resume, such as work experience, education, etc.) to respond to your contact. We also process personal data from you for external presentation as well as for information about and optimization of our products, services and projects.

The legal basis for the processing is Art. 6 para. 1 lit. f) GDPR. The legitimate interest pursued by us lies in contacting (potential) applicants, customers and interested parties, external presentation as well as informing you about and optimizing our products, services and projects.

The legal basis for the processing of your personal data is Art. 6 para. 1 lit. b) GDPR, insofar as your contact is made for the purpose of concluding or executing a contract with us.

We ask you to refrain from providing us with special categories of personal data or similarly sensitive categories of personal data when contacting us.

The data you enter in the contact request will remain with us until you request us to delete it, revoke your consent to store it, or the purpose for storing the data no longer applies (e.g. after we have completed processing your request). Mandatory legal provisions - in particular retention periods - remain unaffected.

5 Information about the processing of your personal data at the respective social media platform

5.1 X Page (formerly Twitter)

We operate this site as a communication and information channel to inform about our offers. We do not collect any data ourselves via your X account. However, the data you enter on X, in particular your username and the content published under your account, will be processed by us insofar as we may retweet your tweets or reply to them, or also compose tweets from us that refer to your account. The data freely published and disseminated by you on X can thus be included by us in our offer and made accessible to our followers. Personal data is processed in accordance with Art. 6 (1) f) GDPR on the basis of our legitimate interest in using this contemporary information and interaction opportunity with users and visitors to the site.

We would like to point out that you use the X short messaging service offered here and its functions on your own responsibility. This applies in particular to the use of the interactive functions (for example, sharing or rating). Information about what data is processed by X and for what purposes can be found in X's privacy policy: https://x.com/en/privacy.

We have no influence on the type and scope of the data processed by X, the type of processing and use or the transfer of this data to third parties. We also have no effective control options in this respect.

5.2 LinkedIn Page

We operate this site as a communication and information channel to inform about our offers. We process your data when you communicate with us via LinkedIn. By analyzing the calls and interactions on our LinkedIn page, we obtain usage profiles and statistics. The visitor statistics created are transmitted to us exclusively in anonymized form. We do not have access to the underlying data in each case. Through this information collected by LinkedIn, demographic and geographic evaluations are also created and made available to us. Based on all this information, companies can better understand which posts interest users in order to better interact with their target group or to be able to serve better advertising. Personal data is processed in accordance with Art. 6 (1) f) GDPR on the basis of our legitimate interest in the use of this timely information and interaction with users and visitors to the site.

There is thereby partly a processing of personal data in joint responsibility with LinkedIn (this is the case for the use of the Insights page). LinkedIn provides more detailed information on joint responsibility and processing here: https://legal.linkedin.com/pages-joint-controller-addendum.

In addition, processing of personal data is also carried out by LinkedIn Ireland Unlimited Company as a processor (for the use of the Talent/Hiring, LinkedIn Learning, Glint/Engage, Sales and Marketing Solutions features). LinkedIn provides more detailed information on order processing here: https://www.linkedin.com/legal/l/dpa.

In connection with your visit to our online presence, LinkedIn may also process personal data beyond this. In this case, the processing is carried out under the sole responsibility of LinkedIn and without our knowledge. You can find more information about this at: https://www.linkedin.com/legal/privacy-policy.

We would like to point out that you use this LinkedIn page and its functions on your own responsibility. This applies in particular to the use of interactive features (for example, when you post a comment, click a like button, share a post, send us a message, access the page, or engage in any other possible interaction on our LinkedIn page).

We have no influence on the type and scope of the data processed by LinkedIn, the way it is processed and used, or the transfer of this data to third parties. We also have no effective control options in this respect. With the use of LinkedIn, your personal data is collected, transmitted, stored, disclosed and used by LinkedIn.

Essence of joint responsibility agreement

From the agreements with LinkedIn also on joint responsibility, it essentially follows that requests for information and the assertion of other data subject rights are sensibly asserted directly with LinkedIn. This is

because as the provider of the social network and the possibility of including LinkedIn pages there, LinkedIn alone has direct access to the necessary information and can also take any necessary measures and provide information immediately. However, if our support is required, we can be contacted at any time.

5.3 Xing Page

We operate this site as a communication and information channel to inform about our offers. We process your data when you communicate with us via Xing. By analyzing the calls and interactions on our Xing page, we obtain usage profiles and statistics. The visitor statistics created are transmitted to us exclusively in anonymized form. We have no access to the underlying data in each case. Through this information collected by Xing, demographic and geographic evaluations are also created and made available to us.
Based on all this information, companies can better understand which posts interest users in order to better interact with their target group or to be able to serve better advertising. Personal data is processed in accordance with Art. 6 para. 1 lit. f) GDPR on the basis of our legitimate interest in using this timely information and interaction opportunity with users and visitors to the site.

We would like to point out that you use this Xing site and its functions on your own responsibility. This applies in particular to the use of the interactive features (for example, when you post a comment, click a like button, share a post, send us a message, access the page, or engage in any other possible interaction on our Xing page).

We have no control over the nature and extent of the data processed by Xing, the manner in which it is processed and used, or the disclosure of such data to third parties. We also have no effective control options in this respect. By using Xing, your personal data is collected, transferred, stored, disclosed and used by Xing.

You have options to restrict the processing of your data in the general settings of your Xing account. In addition, you can restrict Xing's access to contact and calendar data, photos, location data, etc. on mobile devices (smartphones, tablet computers) in the settings options there. However, this depends on the operating system used.

Further information on these points is available on Xing's privacy policy: https://privacy.xing.com/en.

6 Processing outside of the European Union

In principle, we only process your personal data in Germany and in the European Union.

The respective social media providers described here process and possibly transfer your data to countries outside the European Union. What information they receive and how it is used is described by the respective social media providers in their privacy statements, which are linked at the beginning of this privacy policy.

7 Sources of personal data in case of third-party collection

We only process personal data that we collect directly from you.

8 Automated decision making

We do not use automated decision-making, including profiling according to Art. 22 GDPR.

9 Data subject rights

As a person affected by the processing of personal data, you have the following rights:

- To request confirmation as to whether we are processing personal data relating to you; if this is the case, you have the right to information on this processing.
- To request the correction of inaccurate personal data concerning you and the completion of incomplete personal data concerning you.
- Under the conditions of Art. 17 GDPR, to request the erasure of personal data concerning you, including if the processing was carried out unlawfully or is no longer necessary.
- Under the conditions of Art. 18 GDPR, to request restriction of the processing of personal data concerning you, inter alia, in lieu of erasure of the data.
- To receive personal data concerning you that you have provided in a structured, common and machine-readable format or to transfer it to another controller, provided that the processing is carried out with the aid of automated procedures and is based on your consent or a contract with you (data portability).
- To revoke any consent given to us to process your personal data at any time with effect for the future (revocation of consent). The lawfulness of the processing of your data until the revocation remains unaffected.

You can contact us at any time to assert your data subject rights. To do so, please use our contact details listed under section 1.

If you believe that the processing of your personal data violates data protection law, you may also file a complaint with a supervisory authority, in particular in the EU member state or federal state of your habitual residence, place of work or the place of the alleged violation you are complaining about.

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Contact

Group Data Protection Office

kloeckner.i GmbH

Ackerstraße 14-15

D-10115 Berlin

Email: dataprivacy@kloeckner.com

Info-kci@kloeckner.com

www.kloeckner.com

Management board:

Florian Mialki-Schulze

(Chairman/CEO)

Benjamin Papenfuß (CDO)

Frank Roth (CFO)