Procedural directories according to Art. 30 GDPR of delosfoto GmbH

Responsible company **delosfoto GmbH**

Responsible managers of the company **CEO Sigfried Thomas**

Head of data processing **GF Sigfried Thomas**

delosfoto GmbH has not appointed a data protection officer, as the total number of employees is <10.

Business address **Brandenburger Straße 12, 64823 Groß-Umstadt**

Translated with www.DeepL.com/Translator

Annex 3a Employees List of procedures and processing overview pursuant to § 4g para. 2 BDSG and Art. 30 GDPR

Purpose of data collection, processing or use:
- Implementation of employment contracts
- *Processing of personnel administration/support and payroll accounting*
- *Employee data is collected and stored which is recorded with the personnel questionnaire required under tax law.*
- Employee data required for payroll accounting is collected and stored. This also includes sensitive data such as religion or bank details.
- The data from working hours, sick days and holidays are also collected.
- Employment contracts are available in written form and as data.
- Warnings, certificates and similar correspondence are available in written form and as data.

Date of first data collection
- Date of foundation of the GmbH in 2012.

Accountability
Responsible for the handling / storage of employee data is
- Managing director and accountant
- Tax office handles payroll accounting in cooperation with DATEV

Data subjects of the processing operation
- All employees

Categories of personal data
- Name, address, communication data
- Date of birth
- Tax number, social security number
- Bank details
- Religious and trade union affiliation, if any
- Nationality

Access authorisation
- Accounting specialist
- Executive Committee (CEO)

Data transfer and order processing
- Tax office
- No ADV contract is required for the tax office.
- Fiscal authorities
- As far as we know, the data will not be passed on to third countries.
- No personal data will be transferred to others (except for bank transfer orders).
- The transfer of the payroll accounting from the tax office to delosfoto GmbH takes place via the secure file format ILA.

Deletion periods
- Due to the legal requirements of the tax authorities and pension insurance carriers, data can be deleted at the earliest after 10 years. If a check is announced, the deletion period is extended according to the period to be checked.
- If pension obligations exist, the data is not deleted until after the death of the person concerned.

Employee information and data origin
- Stored data comes from a personnel questionnaire
- Every employee has information about the stored data based on his or her payroll accounting.

Annex 3b Website Contacts List of procedures and processing overview pursuant to Section 4g (2) BDSG and Art. 30 GDPR

Purpose of data collection, processing or use:
- Data collection takes place on the initiative of an interested party/customer via the website of delosfoto GmbH.
- Customer acquisition
- Customer contacts
- Ensuring communication with existing and new customers.
- The website of delosfoto GmbH is free of advertising.

Date of first data collection
- Upon receipt of the contact that the website transmits to the admin program of delosfoto GmbH.

Accountability
Responsible for the handling / storage of the data is
- Management and employees in the office

Data subjects of the processing operation
- Anyone who submits a request, order or question via the Contact Us page of the website.

Categories of personal data
- Incoming e-mails are stored in the Outlook 2013 inbox folder. Incoming e-mails are sent by the web server of delosfoto GmbH when customers download images. The transmission is necessary for the purpose of invoicing.
- Outgoing e-mails to customers etc. are not generated by the web server for security reasons.
- Company, address, communication data
- Contact person, name, communication data, gender for salutation
- If a business relation / order comes off, the data are stored in the Admin program.
- VAT ID if available

Access authorisation
- Executive Committee (OEM)
- When request management
- If Purchase Order/Order Employee Appointment Organization

Data transfer and order processing
- The data from the Admin program is passed on as a result of the daily data backup at AWS. For this purpose, the data is transmitted in encrypted form and stored in encrypted form.
- There is an ADV contract with the webhoster Hetzner and with the email provider Host Europe as well as with google.
- Data may be forwarded to our photographers with the consent of the requestor.

Deletion periods
- Incoming contacts that do not lead to a business relationship will be deleted from the admin program after 10 years.
- The legally prescribed storage obligations shall apply to any business relationships that arise.
- Deletions take place according to the legal requirements (also following e-mails are business papers).

Data origin
- All data will be entered by interested parties on the contact page of delosfoto GmbH. The website runs under HTTPS, the transmission of data is encrypted.

Annex 3c Customer and supplier list of procedures and processing overview pursuant to § 4g para. 2 BDSG and Art. 30 GDPR

Purpose of data collection, processing or use:
- Data collection takes place on the initiative of an interested party/customer by e-mail, telephone or in person.
- Customer and supplier data, also contact persons, are stored in the admin program of delosfoto GmbH.
- Care of customer contacts
- Ensuring communication with existing and potential customers.
- Processing (invoicing) Quotations, orders, delivery notes, invoices, reminders)
- Data on contractual relationships, special agreements

Date of first data collection
- With the beginning of the business relationship. A business relationship begins with a contact.

Accountability
Responsible for the handling / storage of the data is
- Management and employees in the office

Data subjects of the processing operation
- All business partners, customers, photographers, service providers, interested parties, contact persons.

Categories of personal data
- Company, address, communication data
- Contact person, name, communication data, gender for salutation
- Sensitive data such as private addresses and communication data of contact persons are not stored. The exception to this is if the customer is a private individual.
- If a business relation / order exists, the data are stored in the admin program and in the accounting documents.
- All business data and contacts are stored on the web server of delosfoto GmbH.
- Marketing data
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Access authorisation
- Executive Committee (CEO)
- When request / orders management
- If current order employee appointment organization
- Accounting clerk for reminders

Data transfer and order processing
- The backup of websites, databases and utilities is done by AWS. The data is transmitted encrypted daily and stored encrypted on the servers of AWS.
- Cloud services such as Dropbox are used by photographers to transfer images to delosfoto.
- Data can be forwarded to our suppliers (= photographers) with the consent of the inquirer.
- In various cases, invoices must be submitted to the tax authorities.

Deletion periods
- For existing business relationships, the legally prescribed storage obligations apply.
- All e-mails with agreements, arrangements, image processing etc. remain in the Outlook folder.

Data origin
- All data comes from existing or potential customer relationships. Furthermore we gain data from the imprint of publications and websites.
- **Data will not be purchased.**

Annex 3d E-mail Contacts List of procedures and processing overview pursuant to Section 4g (2) BDSG and Art. 30 GDPR

Purpose of data collection, processing or use:
- Data collection takes place on the initiative of an interested party/customer by e-mail, telephone or personally or on the initiative of delosfoto GmbH. Then the data comes from accessible information of the imprint.
- Customer and supplier data, including contact persons, are stored in the admin program.
- Care of customer contacts
- Ensuring communication with existing and potential customers.
- Processing (invoicing) Quotations, orders, delivery notes, invoices, reminders)
- Data on contractual relationships, special agreements can also be made by e-mail.

Date of first data collection
- With the beginning of the business relationship. A business relationship begins with a contact.

Accountability
- Responsible for the handling / storage of the data is
- Management and employees in the office

Data subjects of the processing operation
- All business partners, customers, suppliers, service providers exchange information with delosfoto GmbH by e-mail.

Categories of personal data
- Company, address, communication data
- Contact person, name, communication data, gender for salutation
- Sensitive data such as private addresses and communication data of contact persons are not stored.
- If a business relationship / order exists, the data is stored in the admin program.
- Marketing data
- Private e-mails will be deleted immediately.

Access authorisation
- Executive Committee (CEO)
- When request / orders management
- If current order employee appointment organization
- Accounting specialist for financial matters

Data transfer and order processing
- The data will not be transferred to third countries.
- Cloud services such as Dropbox are not used. Transfer and storage of server backup to AWS is encrypted.
- Data can be forwarded to our image suppliers (photographers) with the consent of the enquirer.
- Agreements, sometimes also the complete e-mail communication must be submitted in different cases to the tax authorities.
- In exceptional cases, a credit assessment of a potential customer is carried out by a credit agency.
- ADV contracts also exist:
  - Google
  - E-mail-Provider Host Europe
  - Internet-Provider Hetzner

Deletion periods and archiving
- For existing business relationships, the legally prescribed storage obligations apply, including correspondence with the customer / interested party.
- In the event of threatening recourse claims, further storage shall also take place beyond the legally prescribed storage obligations.
- Private e-mails will be deleted immediately.
- All e-mails with agreements, arrangements, special image processing remain in the Outlook folder.

E-mail archiving
The specifications for archiving are:
- Tax Code
- German Commercial Code HGB
- Principles for the proper keeping and safekeeping of books, records and documents as well as for data access in electronic form for data access (GoBD). In the opinion of the authorities, a business transaction begins with an inquiry as a "pre-contractual relationship".

Data origin
- All data comes from existing or potential customer relationships or from the imprint of publicly accessible publications.
- **Data will not be purchased.**

Annex 3e Correspondence List of procedures and processing overview pursuant to § 4g para. 2 BDSG and Art. 30 GDPR

Purpose of data collection, processing or use
- Data collection takes place on the initiative of an interested party/customer by e-mail, telephone or in person. Contact can also be established by delosfoto GmbH by telephone or letter post.
- Customer and supplier data, including contact persons, are stored in the admin program.
- Paper-based correspondence is not digitally archived.

Date of first data collection
- With the beginning of the business relationship. A business relationship begins with an inquiry.

Accountability
Responsible for the handling / storage of the data is
- Management and employees in the office

Data subjects of the processing operation
- All business partners, customers, suppliers, service providers exchange the information with delosfoto GmbH by letter post or correspondingly.

Categories of personal data
- Company, address, communication data
- Contact person, name, communication data, gender for salutation
- Sensitive data such as private addresses and communication data of contact persons are not stored. Exception: The customer is a private person.
- If a business relationship / order exists, the data is stored in the admin program. This is a prerequisite for creating the business papers.
- On the web server of delosfoto GmbH the data of inquiring customers are also stored.
- Marketing data is recorded when it makes sense to do so.

Access authorisation
- Executive Committee (CEO)
- When request / orders management
- If current order employee appointment organization

Data transfer and order processing
- The data stored in the admin program will not be forwarded to third countries.
- Cloud services such as Dropbox are not used. Transfer and storage of server backup to AWS is encrypted.
- After agreement of the inquirer data can be passed on to our picture producers (photographers).
- Agreements, sometimes also the complete communication must be submitted in different cases to the tax authorities.
- In exceptional cases, a credit assessment of a potential customer is carried out by a credit agency.

Deletion periods
- For existing business relationships, the legally prescribed storage obligations apply, including correspondence with the customer / interested party.

- In the event of threatening recourse claims, further storage shall also take place beyond the legally prescribed storage obligations.
- Paper-based correspondence will be destroyed (shredded) after the statutory retention periods have expired.

Data origin
- All data comes from existing or potential customer relationships or from the imprint of publicly accessible publications.

Anlage 3f Telefonkontakte Verfahrensverzeichnis und Verarbeitungsübersicht nach § 4g Abs. 2 BDSG und Art. 30 GDPR

Purpose of data collection, processing or use:
- Data collection takes place on the initiative of an interested party/customer by telephone or in person.
- Contact can also be made on the initiative of delosfoto GmbH.
- Customer and supplier data, also contact persons, are stored in the admin program of the delosfoto server.
- A telephone note is made on paper. This is destroyed after the data is entered into the program.
- Paper-based correspondence is not digitally archived.
- If one or more e-mails are sent due to a telephone contact, all e-mails with agreements, arrangements, requests for special image processing remain in the Outlook folder.

All further process steps are carried out as in 3e.

Annex 3g Applications List of procedures and processing overview pursuant to § 4g para. 2 BDSG and Art. 30 GDPR

Applications received in writing will be returned immediately if there is no interest in the applicant.
Applications received by e-mail will be deleted immediately if there is no interest in the applicant.
The solution deadlines are set at a maximum of 4 weeks.
The data of incoming applications will not be stored.

Annex 3h Pictorial material List of procedures and processing overview pursuant to § 4g para. 2 BDSG and Art. 30 GDPR

- Pictures are made available to the picture agency delosfoto GmbH by photographers.
  The pictures of the photographers reach delosfoto via cloud services. The responsibility for the pictures lies with the photographers until they reach the recipient delosfoto GmbH after downloading.

- The provided pictures are checked by employees of delosfoto GmbH for compatibility with the KUG and other legal regulations. Possibly necessary contracts and permissions are requested.

- With the program Uploader the images are transferred to the web server of delosfoto GmbH, at the same time the original file is stored on the in-house server of delosfoto GmbH. The transfer to the web server is encrypted.

- Then the assignment of the pictures for the texting takes place to the appropriate photographer. Photographers can only edit their assigned images. The website delosfoto.de is HTTPS encrypted. The responsibility for the texting of the pictures lies with the photographers.

- The backups created on removable disks (2-fold) and the files on the in-house server are not encrypted. However, it is ensured that no third party can access these data.

- Copies of the image files are made using the JPG format. These are encrypted and sent to the web server via FTP. These are the files that registered customers can download directly.

- The data collection and storage is the business basis of delosfoto GmbH and the the photographers and therefore happens out of justified interest.

- There is no deletion period for images. The right of photographed persons according to §34 BDSG and Art.15 GDPR to information, possible correction or deletion is guaranteed. Model and property contracts cannot be revoked.

- Photographers have the right to demand the removal of their possibly not legally impeccable images from the publicly accessible image search.

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