

DATA PRIVACY POLICY FOR SOCIAL MEDIA

Information on data processing pursuant to Articles 13 and 14 GDPR (General Data Protection Regulation)

Kommunalkredit Austria AG (the “Bank”) is making every effort to protect the personal data of its customers. The Bank complies with the legal provisions in force regarding the protection, lawful processing and secrecy of personal data as well as data security, in particular the Austrian Data Protection Act (“DSG”), the General Data Protection Regulation (“GDPR”) of the European Union and the Austrian Telecommunications Act (“TKG”). We herewith inform you about the processing of your personal data and the rights you have under data protection and privacy law.

1. Who is responsible for data processing and who can you turn to?

Responsible for data processing:

Kommunalkredit Austria AG

Türkenstrasse 9 | 1092 Vienna | Austria

T +43 1 31631 | F +43 1 31631-105

@ info@kommunalkredit.at

W www.kommunalkredit.at

The **data protection officer** can be contacted at:

@ datenschutz@kommunalkredit.at

Türkenstrasse 9 | 1092 Vienna | Austria

T +43 1 5334795 23

2. In the following, we inform you about the information we collect and process if you visit and use our social media platforms indicated below.

- **Instagram:**
<https://www.instagram.com/kommunalkreditaustria/>
- **Kununu:**
<https://www.kununu.com/at/kommunalkredit-austria3>
- **LinkedIn:**
https://at.linkedin.com/company/kommunalkredit?trk=guest_job_details_topcard_org_name
- **Twitter:**
<https://twitter.com/kommunalkredit>
- **YouTube:**
<https://www.youtube.com/user/Kommunalkredit>

3. What are personal data?

Personal data are defined as any information relating to an identified or identifiable data subject. This includes, inter alia, your name, your email address and your IP address.

4. What personal data are processed for which purposes and on what legal basis?

We process the personal data we receive from you within the framework of your interaction on our social media platforms.

4.1 Contacting us via Instagram, LinkedIn, Kununu und Twitter

If you contact us by email, telephone, post or via the news function of the social media platform, we will store the personal data voluntarily shared by you (form of address, title, name, company, email, telephone number), you user details (user name, IP address) and the content of your enquiry so that we can respond to it and, if necessary, ask follow-up questions.

We will use such data pursuant to Art 6 para 1 point f GDPR in order to meet your request and reply to your enquiry as soon as possible. The data will be stored for a maximum of six months after your request has been dealt with.

4.2 Interactions on Instagram, Twitter and YouTube

On Instagram and Twitter, subscribers and other users can mark our posts with "like", comment on them, share and save them. This provides the basis for a communication that is intended to give customers and interested parties an insight into Kommunalkredit by means of visual narration. We store the personal data voluntarily provided on our company pages (e.g. name, comment and other contents etc.) on the basis of legitimate interests on your part in the announcement of your personal opinion in accordance with Art 6 para 1 point f GDPR for as long as you do not remove the "Like" indication or delete the comment or this is lawfully deleted by the platform operator within the scope of the Terms of Use (e.g. in cases of abuse).

4.3 Evaluations and comments on Kununu

Current and former employees, job applicants and other visitors can evaluate us as an employer and post comments on our Kununu social media site. Comments are posted anonymously and processed and replied to by our HR team. The personal data you disclose voluntarily on our Kununu website (e.g. name, user details, evaluation and other contents, etc.) are stored on the basis of the legitimate interest of the public in your experience and your legitimate interest in expressing your personal opinion pursuant to Art.6 para.1 point f GDPR, as long as you do not delete the evaluation and/or it is not lawfully deleted by the platform operator within the framework of the terms of use (e.g. in cases of abuse).

4.4 Applications posted on LinkedIn

We post vacancies on LinkedIn and thus enable you to apply for vacant positions by uploading your CV. Applications received are processed by our recruiting team, as described at:

https://www.kommunalkredit.at/fileadmin/user_upload/Website_Datenschutzerklaerung_fuer_Bewerber_KA.pdf

4.4 Statistics and marketing analyses via Instagram and LinkedIn

When you browse, register and interact on our social media platforms (e.g. via social plugins), the social media operators frequently process your data for the purpose of statistics and analyses. From the Instagram social media platform we receive (i) general statistics that include information about the target group and its location, age group, gender and activity, (ii) statistics on individual posts such as the number of "Like" entries, comments and activities and (iii) statistics on posts in stories. From the LinkedIn social media platform we receive (i) job-specific statistics based on the applicants' profiles, (ii) general statistics on the number of followers, and (iii) demographic statistics from the social media platforms. Hence, we share the responsibility for such data processing with the social media operators as joint controllers pursuant to Art 26 GDPR.

We process such data on the basis of our legitimate interests pursuant to Art 6 para 1 point f GDPR. Our recruiting team and our HR department have a legitimate interest in learning which individuals from which industry and demographic bracket express an interest in our company and the vacancies advertised. We exclusively receive and process anonymous data.

5. Who receives your data?

Within the Bank, your data will be shared with those units and/or employees that require your data to fulfil contractual, legal and regulatory obligations and thus pursue legitimate interests. Moreover, your personal data will also be shared with the operators of social media platforms on which we run a company site.

6. What data protection rights do you have?

You have, at any time, a right to access, rectification, erasure or restriction of processing of your stored data, a right to object to processing as well as a right to data portability as set out in data protection law (see Article 15 seq. GDPR). If you have any questions regarding issues of data protection law, please do not hesitate to contact the Bank or the data protection officer.

Moreover, you can withdraw your consent at any time and without indicating a reason in order to prevent the continued use of your personal data collected and used on the basis of an earlier declaration of consent.

Complaints can also be addressed to the competent data protection authority:

- For Austria: Datenschutzbehörde | Barichgasse 40-42 | 1030 Wien | www.dsb.gv.at
- For Germany: Bundesbeauftragte für den Datenschutz und die Informationsfreiheit (BfDI) | Husarenstrasse 30 | 53117 Bonn | www.bfdi.bund.de

7. Further relevant data privacy information provided by the social media platform operators

As you are a registered user of the aforementioned social media platforms, all other forms of data processing (e.g. comment, like, share functions) are subject to the data privacy statements of these providers:

- **Instagram:** <https://de-de.facebook.com/help/instagram/155833707900388>
- **Kununu:** <https://privacy.xing.com/de/datenschutzerklaerung/druckversion>
- **LinkedIn:** https://www.linkedin.com/legal/privacy-policy?_l=de_DE
- **Twitter:** <https://twitter.com/de/privacy>
- **YouTube:** https://support.google.com/youtube/topic/2803240?hl=de&ref_topic=6151248

As at: 13/02/2020