

Data Privacy Notice

1. Circuit is a WebRTC client supporting audio- and video communication, chat, screen sharing and file sharing. Your personal data (as further described below) will be used to enable your usage of these functionalities.

2. With regard to personal data that you store on or enter into Circuit or that is generated in the course of your use of Circuit (e.g. chats, recordings, uploaded files) ("Circuit User Data"), the Siemens company employing you ("Siemens") is the data controller.

Siemens AG, Germany, is the data controller for your contact data imported from Siemens Corporate Directory ("SCD Data"), while the Siemens company employing you is the data controller for any additional personal information that you voluntarily add to your user profile (e.g. picture, status of presence).

If you are not a Siemens employee, the data controller for any personal data related to you (Circuit User Data generated by you as well as all data in your personal profile) is the Siemens company that acts as sponsor for you or that has invited to you to communicate on Circuit.

3. Your personal data will be processed for the following purposes:

- offer the services and functions of Circuit and to administer your use of Circuit
- as reasonably necessary to enforce these Terms of Service, Siemens' rules and regulations, to establish or preserve a legal claim or defense and to prevent fraud or other illegal activities.

If you are based in the European Economic Area, the legal basis for Siemens processing data about you is that such processing is necessary for the purposes of

- legitimate interests pursued by Siemens (Article 6 (1) (f) General Data Protection Regulation). The legitimate interest pursued by Siemens in relation to the use of your personal data is the efficient operation, management and support of Circuit; and/or
- compliance with Siemens' legal obligations (Article 6 (1) (c) General Data Protection Regulation).

4. All Circuit User Data will be stored for 180 days by default, unless deleted manually by the user. If the data is deleted in the conversation, it will also be deleted in the database.

A user is able to delete any Circuit User Data that he or she has generated (e.g. a chat entry) at any time, but not an entire conversation. After 180 days Circuit User Data will be deleted automatically. Conversations are automatically deleted in their entirety 180 days after they were last modified. The data deletion will be executed once a month after a system update.

In order to document project and team contents, the conversation can optionally be switched to persistent storage. Only those employees who activated the persistent storage are allowed to deactivate it again. After the deactivation the 180 days deletion rule is effective again. The persistent storage is limited to 10 years, afterwards the data will be deleted from the system.

5. Siemens may transfer your personal data to:

- other Siemens companies in connection with your use of Circuit;
- to Atos Information Technology GmbH and its subcontractors which operate Circuit on behalf of Siemens AG

- third parties in connection with complying with legal obligations or establishing, exercising or defending rights or claims (e.g., for court and arbitration proceedings, to law enforcement authorities and regulators, to attorneys and consultants).

If you are located within European Economic Area, please be aware that sometimes the recipients to whom Siemens transfers or discloses your personal data are located in countries in which applicable laws do not offer the same level of data protection as the laws of your home country.

In such cases and if required by applicable law, Siemens takes measures to implement appropriate and suitable safeguards for the protection of your personal data. In particular:

- We share your personal data with Siemens companies in such countries only if they have implemented the Siemens Binding Corporate Rules („BCR“) for the protection of personal data. Further information about the Siemens BCR can be found [here](#).
- We transfer personal data to external recipients in such countries only if the recipient has (i) entered into [EU Standard Contractual Clauses](#) with Siemens, (ii) implemented [Binding Corporate Rules](#) in its organization or (iii) – in case of US recipients – the recipient is certified under the [Privacy Shield](#). You may request further information about the safeguards implemented in relation to specific transfers by contacting dataprotection@siemens.com.

6. The data protection law applicable to Siemens when processing your personal data may entitle you to specific rights in relation to your personal data. You can find out more about those rights by contacting dataprotection@siemens.com.

In particular and subject to the respective statutory requirements, if you are located in the European Economic Area, you are entitled to:

- Obtain from Siemens confirmation as to whether or not personal data concerning you

are being processed, and where that is the case, access to the personal data;

- Obtain from Siemens the rectification of inaccurate personal data concerning you;
- Obtain from Siemens the erasure of your personal data;
- Obtain from Siemens restriction of processing regarding your personal data;
- Data portability concerning personal data, which you actively provided; and
- Object, on grounds relating to your particular situation, to processing of personal data concerning you.

7. Data Privacy Contact

The Siemens Data Privacy Organization provides support with any data privacy related questions, comments, concerns or complaints or in case you wish to exercise any of your data privacy related rights. The Siemens Data Privacy Organization may be contacted at: dataprotection@siemens.com.

The Siemens Data Privacy Organization will always use best efforts to address and settle any requests or complaints you bring to its attention. Besides contacting the Siemens Data Privacy Organization, you always have the right to approach the competent data protection authority with your request or complaint.