

Social Media Channels

Union Investment Institution GmbH

Privacy Notice

I. Union Investment's privacy policy for the use of LinkedIn

Union Investment Institution GmbH (Union Investment) uses the technical platform and services of LinkedIn Ireland Unlimited Company ('LinkedIn'), whose principal place of business is at Wilton Place, Dublin 2, Ireland, to provide its LinkedIn content. This company is responsible for persons who are located in a member state of the European Union or the European Economic Area, or in Switzerland.

Union Investment is responsible for the content of this platform. We would point out that you are responsible for your use of all the LinkedIn services offered here.

Union Investment can neither influence nor control the nature and scope of the data processed by LinkedIn, the nature of the processing and use, or the sharing of this data with third parties (such as Microsoft Corporation MS, LinkedIn USA, etc.).

1. Data processing by LinkedIn

When you use the LinkedIn service, your personal data is processed by LinkedIn in Ireland and potentially also in other countries. LinkedIn is responsible for this processing.

LinkedIn may also collect this data from users who are not registered and not logged in. Further information about the collection and processing of data by LinkedIn can be found for example in the privacy notice at: <https://www.linkedin.com/legal/privacy-policy> and in the information about the use of cookies or similar technologies at: <https://www.linkedin.com/legal/cookie-policy>.

Additional information is available on the following LinkedIn pages:

- <https://www.linkedin.com/help/linkedin>
- Click on the links below for information on the General Data Protection Regulation (GDPR) with regard to: All LinkedIn Members, Talent Solutions, Marketing Solutions & Elevate, Sales Solutions, LinkedIn Learning, Suppliers, Business Development:
 - <https://www.linkedin.com/help/linkedin/topics/6701/6702>
 - <https://www.linkedin.com/help/linkedin/topics/6701/6703>
 - <https://www.linkedin.com/help/linkedin/topics/6701/6704>
 - <https://www.linkedin.com/help/linkedin/topics/6701/6705>
 - <https://www.linkedin.com/help/linkedin/topics/6701/6706>
 - <https://www.linkedin.com/help/linkedin/topics/6701/6707>
 - <https://www.linkedin.com/help/linkedin/topics/6701/6708>

- Information on safety and security when using LinkedIn is available at:
 - <https://safety.linkedin.com/>
- You can also view LinkedIn's terms and conditions of use here:
 - <https://www.linkedin.com/legal/user-agreement>

LinkedIn uses log-in data, cookies, device information and internet protocol addresses (IP addresses) to identify you and log your usage of the site. LinkedIn also uses cookies and similar technologies (such as web beacons, pixels, ad tags and device identifiers), information about your IP address, your proxy server, your operating system, your web browser and your add-ons, your device identifier and functions and/or your internet service provider or your mobile network operator to identify you and/or your devices within, outside and across different services and devices. LinkedIn also permits third parties to use this data. For further information please go to <https://www.linkedin.com/legal/privacy-policy>.

Activity data is also collected. LinkedIn receives information about your visits and interactions with services provided by third parties when you are logged in via LinkedIn or when you visit third-party providers. This may occur for example through the use of plug-ins (such as 'Share on LinkedIn' or 'Apply via LinkedIn'), ads, cookies or similar technologies. When you visit or leave the site, LinkedIn uses plug-ins, cookies or similar technologies on the third-party website to determine the URL of the website from which you navigate to LinkedIn and the site you go to next. For further information please go to <https://www.linkedin.com/legal/privacy-policy>.

LinkedIn can also identify your location. If you access LinkedIn services from a mobile device, the device uses your telephone settings to determine your location.

You can restrict the processing of your data by adjusting the settings of your LinkedIn account. See: <https://www.linkedin.com/help/linkedin/answer/62931>. You can also use the settings to restrict LinkedIn's access to your data and unsubscribe from LinkedIn emails, text messages and personalised advertising at <https://www.linkedin.com/psettings/guest-controls>.

LinkedIn uses its own analysis tools to evaluate this data. Union Investment does not have any control over the use of these tools. Nor does Union Investment have the means to prevent or discontinue the use of such tools.

2. Data processing by Union Investment

The protection of your data is very important to us. We therefore comply with the applicable provisions of data protection law and employ technical and organisational measures to ensure that your data is adequately protected.

Union Investment does not know specifically what data is collected and processed by LinkedIn for its own purposes. Nor does Union Investment have full access to the data collected by LinkedIn.

Union Investment receives personal data from LinkedIn if you actively share this information with us via a direct message. The personal data shared with us via the public comment function or in a direct message (e.g. first and last name) is used by Union Investment to deal with your query. The Union Investment Group company responsible for dealing with your enquiry uses this information exclusively for handling and answering your enquiry or providing the requested information. Your data will not be disclosed to third parties. Article 6 (1) sentence 1 f GDPR constitutes the legal basis for the processing of the aforementioned data.

3. Data processing using Lead Gens

Union Investment also uses Lead Gen Forms on the LinkedIn page. This involves advertisements being placed for the purpose of generating leads by a processor engaged by Union Investment.

Lead Gen Forms are used to provide draw the attention of LinkedIn users to a specific offering and to deliver the offering concerned to users who provide their personal data. Specific examples may be studies and papers or events that Union Investment wishes to publicise and which users can download or register for. Users must firstly have consented to the sharing of predefined personal data with Union Investment. The personal data enables Union Investment to identify prospective customers and then contact them in connection with other products and services.

Union Investment defines in advance the personal data that will be entered in the input field by the user. This may include contact details (email address/phone number, postal code, etc.), professional details (e.g. current position), company details (e.g. current employer), educational attainment (e.g. Master's degree) and demographic data.

The purpose of the processing is to identify prospective customers and to establish contact with them. The protection of your personal data is very important to us in this stage of the process too, and the data is therefore encrypted to prevent unauthorised access.

The data is deleted as soon as the purpose for which it has been collected and processed no longer exists, provided that there are no record retention requirements preventing its deletion.

4. Rights of the data subject

Union Investment is responsible for the personal data processed by Union Investment within the Union Investment LinkedIn account and for the related content. This means that you can assert your rights as a data subject under the General Data Protection Regulation (GDPR) against Union Investment, insofar as these rights relate to personal information for which Union Investment is responsible. However, you should note that – with regard to the handling of data subject rights and, for example, requests for information – Union Investment can only provide information about the personal data for which Union Investment is responsible in connection with its LinkedIn account. As there is no joint responsibility (at least under current law) between Union Investment and LinkedIn, Union Investment is not obliged to provide information about personal data processed by LinkedIn at its own responsibility.

If you have any questions about the information we provide, you can contact us at soziale_medien@union-investment.de. If you have questions concerning the processing of your data by Union Investment, please contact us at datenschutz@union-investment.de. Our privacy notice, including an explanation of your rights as a data subject, is here <https://union-investment.com/home/privacy-policy>.

5. Balancing of interests

The use of the Union Investment LinkedIn account does not itself necessitate a data protection impact assessment (DPIA) in accordance with Article 35 (1) GDPR. However, use of LinkedIn may have far-reaching consequences and may constitute an increased risk to the rights and freedoms of the data subject due to the possibility of profiling and profile enrichment by LinkedIn. By using a LinkedIn account, users are opening themselves up to systematic monitoring of their online activities. The data collected by LinkedIn

can be used to create personality profiles, for example including the personalised targeting of specific advertising content. The data collected can be pieced together. Even passive use of the LinkedIn service (without a registered LinkedIn account) can enable LinkedIn to collect log data (such as previously visited websites or location data) and can result in the analysis of sensitive data.

Union Investment has carried out a data protection impact assessment (DPIA) on the basis of the circumstances outlined above and the residual risks:

a) Risk analysis:

Firstly, there are risks for data subjects arising from the use of the LinkedIn service, irrespective of the information made public by Union Investment and the use of the Union Investment LinkedIn account.

It should also be noted that data processed on the basis of interactions with LinkedIn accounts through use of the comments function is public, freely available on the internet and accessible to anyone.

Through its own use of the LinkedIn service, Union Investment is increasing the quantity of data that can be used and evaluated by LinkedIn and thereby increasing the extent of the processing of personal data.

In addition to increasing the dissemination of personal data, it is also enhancing the ability of LinkedIn to link pieces of information together. Overall, this makes profiling easier. The public comments function via LinkedIn can also have consequences for society because of comments that are slanderous, cause reputational damage, or allow the dissemination of sensitive information.

It is not necessary to create a LinkedIn account in order to use the Union Investment LinkedIn pages. Alternative contact details and information options can be provided instead. In order to reduce this risk, the communication on the Union Investment LinkedIn account will be moderated. Consequently, no Union Investment customer or prospective customer needs to create a LinkedIn account.

b) Risk assessment:

Overall, the risk created by Union Investment for data subjects is to be categorised as low to moderate. Discriminatory comments on the Union Investment LinkedIn account are contained through risk-reducing measures (see [Short paper no. 5 of the data protection conference on data protection impact assessment \[German only\]](#)), so that the overall risk of comments slandering or causing reputational damage to data subjects is minimised.

The protection of your personal data is very important to Union Investment. In addition to content moderation, we therefore use technical and organisational measures to adequately protect your data. If, despite all precautions, comments that are slanderous or cause reputational damage are posted on the Union Investment LinkedIn account, this may lead to suspension of the individual user's LinkedIn account.

However, it should be noted that many risk-reducing measures are within the control of the individual user, as individual users can protect their information to a certain degree through their profile settings (see https://www.linkedin.com/legal/privacy-policy?trk=homepage-basic_footer-privacy-policy).

c) Outcome:

The balancing assessment carried out concluded that the use of the LinkedIn service by Union Investment is acceptable (as at March 2021). Union Investment will monitor developments in data protection law and adjust the risk assessment accordingly.