

Social Media Channels

Union Investment Institution GmbH

Privacy Notice

I. Union Investment's privacy notice for the use of XING

Union Investment Institution GmbH ('Union Investment') uses the technical platform and services of Xing or New Work SE ('Xing'), whose principal place of business is at Dammtorstrasse 30, 20354 Hamburg, Germany, to provide its Xing content.

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

Union Investment can neither influence nor control the nature and scope of the data processed by Xing, the nature of the processing and use, or the sharing of this data with third-party companies or non-EU countries.

1. Data processing by Xing

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

Xing may also collect this data from Xing users who are not registered and not logged in. Further information about the collection and processing of data by Xing can be found for example in the privacy notice at

<https://privacy.xing.com/en> and via the links on that page.

New Work SE, Dammtorstrasse 30, 20354 Hamburg, Germany, is responsible for processing the personal data for Xing.

Xing's privacy policy contains a detailed description of the personal data processed by Xing and is available at:

<https://privacy.xing.com/en/privacy-policy>.

Further information on how data is processed across the whole Xing service (including all applications) is provided as part of Xing's privacy policy, which can be accessed via the following links:

- Xing TalentManager (https://www.xing.com/legal/privacy_policy_talentmanager)
- Xing TalentPoolManager (https://www.xing.com/legal/privacy_policy_talentpoolmanager)
- Xing AdCreator (<https://www.xing.com/terms>)
- FreelancerManager (https://www.xing.com/legal/privacy_policy_freelancermanager).

Xing uses your personal data in accordance with the terms and conditions of use agreed when a Xing account is created. Xing also processes your personal data when using tracking technologies to measure and optimise advertising or in connection with competitions, although only if you have consented to this

in advance. The data processed by Xing includes login details, profile data and news, group posts, participation in events and payment data. This information is transferred to Xing upon being provided by the user. Your data is also automatically captured via tracking technology when you visit Xing pages.

The privacy policy does not state whether data is transferred to non-EU countries or to which non-EU countries it may be transferred.

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 Xing for its own purposes. Nor does Union Investment have full access to the data collected by Xing.

3. Rights of the data subject

Union Investment is responsible for the personal data processed by Union Investment within the Union Investment Xing 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 Xing account. As there is no joint responsibility (at least under current law) between Union Investment and Xing, Union Investment is not obliged to provide information about personal data processed by Xing 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>.

4. Balancing of interests

The use of the Union Investment Xing account does not itself necessitate a data protection impact assessment (DPIA) in accordance with Art. 35 (1) GDPR. However, use of Xing 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 Xing. By using a Xing account, users are opening themselves up to systematic monitoring of their online activities. The data collected by Xing 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 Xing service (without a registered Xing account) can enable Xing 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 Xing service, irrespective of the information made public by Union Investment and the use of the Union Investment Xing account.

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

Through its own use of the Xing service, Union Investment is increasing the quantity of data that can be used and evaluated by Xing 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 Xing to link pieces of information together. Overall, this makes profiling easier. The public comments function via Xing 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 Xing account in order to use the Union Investment Xing pages. Alternative contact details and information options can be provided instead. In order to reduce this risk, the communication on the Union Investment Xing account will be moderated. Consequently, no Union Investment customer or prospective customer needs to create a Xing 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 Xing 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 our 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 Xing account, this may lead to suspension of the individual user's Xing 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://privacy.xing.com/en/your-privacy>).

c) Outcome:

The balancing assessment carried out concluded that the use of the Xing 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.