ESSENCE OF THE AGREEMENT ON JOINTLY RESPONSIBLE PROCESSING OF PERSONAL DATA

between

Eucon GmbH, Martin-Luther-King-Weg 2, 48155 Münster, Germany

– hereinafter "**Controller A**" –

and

Eucon Digital GmbH, Martin-Luther-King-Weg 2, 48155 Münster, Germany

– hereinafter "**Controller B**" –

and

Eucon of North America, LLC, 1230 Peachtree Street NE, Suite 1900, Atlanta, GA 30309, USA

– hereinafter "**Controller C**" –

– together with Controller A and B "**the Parties**" –

The Parties have entered into an agreement on the joint use of personal data as Joint Controllers within the meaning of Article 26 GDPR.

1. The nature, scope and purposes of joint processing are presented below:

Scope and nature	Purposes and means	Data subjects	Data categories	Responsibility
Controller A controls the marketing measures as well as the management of advertising material for the brand/group Eucon for Controller B.	General marketing measures around the "Eucon" brand	Customers, partners, interested parties, suppliers	First name, surname, company name, address, position, industry, customer number, customer type, contact history, data on interests	Controller A defines the purposes and means together with Controller B.
Controller A carries out the press and public relations work brand/group Eucon for Controller B.	Press and public relations, presentation of the company	Journalists, customers, partners, interested parties	First name, surname, company name, medium, address, position, industry, customer number, customer type, contact history, data on interests	Controller A defines the purposes and means together with Controller B.
Controller A assumes the sustainability and social responsibility measures for Controller B.	Social responsibility and sustainability measures	Customers, partners, interested parties	First name, surname, company name, address, position, industry, customer number, customer type, contact history, data on interests	Controller A defines the purposes and means together with Controller B.

Scope and nature	Purposes and means	Data subjects	Data categories	Responsibility
Controller A completely runs the accounting for Controller B and in this context processes the necessary data of the customers and service providers of Controller B.	Accounts receivable accounting, financial accounting, cost and performance accounting	Customers	Address data (company, name, address, e-mail), invoice address, contract data, customer number, type of customer, bank details, booking data, incoming payment data	Controller A defines the purposes and means together with Controller B for each of them.
Controller A completely runs the accounting for Controller B and in this context processes the necessary data of the customers and service providers of Controller B.	Accounts payable, financial accounting, cost and performance accounting	Suppliers	Address data (company, name, address), bank details, booking data, bank transfer data	Controller A defines the purposes and means together with Controller B for each of them.
Controller A operates for Controller B, after booking in the accounts, the possible payment of liabilities to customers and service providers of Controller B.	Payment of payables	Customers, suppliers	Credit transfer and direct debit data (name, bank details, purpose of transfer, amount)	Controller A defines the purposes and means together with Controller B.
Controller A generates corresponding account statements for Controller B.	Account statements for posting in the financial accounting	Customers, suppliers, employees	Bank statement data (name, bank details, purpose of entry, amount)	Controller A defines the purposes and means together with Controller B.
Controller A operates the applicant management for Controller B and C, manages the applications and applicant data for Controller B and C, makes decisions on interviews and hiring or rejection together with Controller B.	Recruitment of new staff, selection and processing of applications to fill vacancies. Processing of the application procedure from receipt of the application to the recruitment of an applicant or rejection.	Applicants	Application data: - Name (first name, surname, title, form of address), - Address (private), - Date of birth, - Place of birth, - Gender, - nationality, - Photograph, - E-mail address (private), - driving licence data, - Telephone numbers private, - Marital status, - Data of family members: Parents / children: Date of birth/age, name, job title, - Professional	Controller A defines the purposes and means together with Controller B and Controller C.

Scope and nature	Purposes and means	Data subjects	Data categories	Responsibility
			qualification, - Study, - Data on vocational education and training, - Career details (including job references), - Data on professional / private interests, - Data on employment, - Membership in associations, - voluntary activities Accounting data: - Bank details - Travel data (arrival and departure, means of transport) Job description	
Controller A assumes the fulfilment of the data subject rights for Controller B with regard to the employees	Fulfilment of the rights of the data subjects according to Art. 12 GDPR, to which they are legally entitled. (with regard to joint responsibility)	Data subjects claiming rights	Name, address, e-mail address, telephone number, request	Controller A defines the purposes and means together with Controller B.
Controller A is responsible for ensuring the IT security of Controller B and takes appropriate technical measures	Securing the company network, physical access control, electronic access control, transfer control, error analysis	Users of the IT infrastructure	Log data, user data: name, IP address, date, time	Controller A defines the purposes and means together with Controller B.
Controller A is responsible for ensuring the IT security of Controller B and C and carries out data based error analyses	Storage is used for error analysis and to control unauthorised access, error analysis of outgoing and incoming e-mails; make applications with Internet connection securely available to clients. Access control	Users of the IT infrastructure	Log data, user data: name, IP address, date, time	Controller A defines the purposes and means together with Controller B and Controller C

Scope and nature	Purposes and means	Data subjects	Data categories	Responsibility
Controller A provides the domain @eucon.com and the e-mail server for the other controllers and administrates the server	Shared use of a single e-mail domain and a single e-mail server	Customers, suppliers, employees, external staff, interested parties, everyone with whom e-mail contact exists	E-mail address, name, contents of the e-mails, sending data of the e-mails	Controller A defines the purposes and means together with Controller B and Controller C.
Controller A controls the marketing instruments channels for Controller B	Control of marketing instruments	Customers, interested parties	First name, surname, company name, address, position, industry, customer number, customer type, contact history, data on interests	Controller A defines the purposes and means together with Controller B.
Controller A and Controller B jointly operate appearances on social media platforms such as Facebook, Instagram, Twitter and LinkedIn	Joint appearance in social media platforms for joint presentation of the service catalogue and joint communication with interested parties	interested parties, Social Media users	Names, account details, data relating to social media Use of the appearances there, if provided by the provider	Controller A defines the purposes and means together with Controller B.
Controller A operates the company website eucon.com jointly with Controller B, controls the content together with Controller B and uses all analysis tools, third-party tools and cookies together with Controller B	Joint Internet presence for the joint presentation of the service catalogue and the companies; joint analysis to improve the offer; joint	Website users	Log data, IP address, name, e-mail address, data from cookies and tracking	Controller A defines the purposes and means together with Controller B.
Controller A takes over the joint purchase order for goods and services from suppliers for Controller B	Processing of orders	Employees, service providers/supplier	Address, contact and order data	Controller A defines the purposes and means together with Controller B.
Controller A handles the joint electronic filing and administration of contracts for Controller B	Electronic filing and administration of contracts in the course of business operations	Employees, service providers/supplier	Address, contact and contract data	Controller A defines the purposes and means together with Controller B.
Controller A is responsible for safeguarding the domiciliary right and avoiding uncontrolled access for Controllers B	The purpose of the survey is to safeguard domiciliary rights; avoidance of	Employees Visitors (service providers, customers, etc.)	Name, Contact details (phone, e-mail)	Controller A defines the purposes and means together with Controller B.

Scope and nature	Purposes and means	Data subjects	Data categories	Responsibility
at the joint company headquarters.	uncontrolled access			
Controller A operates a joint mailing of invitations to joint events for Controller B.	Creation of contact/address lists for sending invitations to events by e-mail/letter.	Employees Customers Interested parties Suppliers	Name, Contact details (phone, e-mail), Name of the company, address, position, industry, data on interests	Controller A defines the purposes and means together with Controller B.

2. The duties and responsibilities with regard to the aforementioned data processing are carried out as follows:

	Controller A (Eucon GmbH)	Controller B (Eucon Digital GmbH)	Controller C (Eucon LLC)
Ensuring the lawfulness of data processing in accordance with Art. 6 GDPR, obtaining consent if necessary.	Towards interested parties, customers and service providers of A, towards employees of A, B and C	Towards interested parties, customers and service providers of B	Towards interested parties, customers and service providers of C
Provision of the key elements of the agreement according to Art. 26 II GDPR.	Towards customers and service providers of A, towards employees of A, B and C	Towards customers and service providers of B	Towards customers and service providers of C
Art. 13 GDPR Obligation to provide information where personal data are collected from the data subject.	Towards customers and service providers of A, towards employees of A, B, and C	Towards customers and service providers of B	Towards customers and service providers of C
Art. 14 GDPR Obligation to provide information where personal data have not been obtained from the data subject.	Towards customers and service providers of A, towards employees of A, B and C	Towards customers and service providers of B	Towards customers and service providers of C
Art. 15 GDPR Processing of requests for access by the data subject.	full responsibility		
Art. 16 GDPR Processing of requests for rectification.	full responsibility		
Art. 17 o. 18 GDPR Processing of requests for erasure or restriction of processing and Art. 19 notification of the above obligations.	full responsibility		
Art. 20 GDPR Processing of requests für data portability.	full responsibility		

Art. 21 GDPR Processing of objections.	full responsibility		
Art. 24 para. 1 i.c.w. Art. 32 GDPR Determination of the technical and organisational measures following risk assessment and where appropriate, data protection impact assessment (Art. 35) and consultation of a supervisory authority/transmission of the necessary information (Art. 36 (3) GDPR).	full responsibility		
Art. 24 para. 1 GDPR Documentation of the selected techn.-org. measures (as proof).	full responsibility		
Art. 24 para. 1 GDPR Review and update of measure.	full responsibility		
Art. 28 GDPR Involvement of processors or subprocessors and their supervision.	full responsibility		
Art. 30 GDPR Maintenance of the record of processing activities.	full responsibility		
Art. 32 GDPR Agreements on the implementation of techn.-org. measures.	For all procedures where Controller A predominantly assumes the tasks or functions		
Art. 33, 34 GDPR Process in case of reportable data breaches (mutual information, possible designation of a lead person);	full responsibility		
Art. 35, Art. 36 GDPR necessary cooperation and mutual assistance in the context of data protection impact assessment	full responsibility		
Art. 37 GDPR Designation of data protection officer.	For Controller A	For Controller B	N/A

3. Contact point for the data subjects pursuant to Article 26(1)(3) GDPR

Primary contact point for data subjects for processing operations covered by shared responsibility is:

Eucon GmbH, Martin-Luther-King-Weg 2, 48155 Münster, Germany, phone +49 251 14496-219, e-mail: datenschutz@eucon.com.

Alternatively, the data subject may contact the data protection officer of Controller A (= primary contact) directly at the above postal address, adding "To the data protection officer" or at the e-mail address: datenschutz(at)eucon.com

Notwithstanding the foregoing, the data subject may exercise his or her rights under this Regulation with and against any Controller (Article 26(3) GDPR).

4. Data transmission to the USA

For the joint responsibility with Controller C and the associated possible data transfer to a third country, the Parties have agreed on the EU standard contractual clauses within the meaning of Article 46 (2) GDPR.