



## Data Protection Notice for the use of our Social Media channels

### I. Introduction and scope

This notice explains the processing of personal data performed by ZF Friedrichshafen AG, or a majority-owned ZF Group company (hereinafter referred to as "ZF", "we" or "us"), as the data controller, when using and visiting its social media channels.

At ZF we take our responsibility to protect personal data seriously. In this Data Processing Notice "personal data" means any information - standing alone or in combination with other information to which we have access - that relates to an identified or identifiable person. We process personal data only in compliance with applicable data protection laws.

### II. Contact details of the data controller

The ZF Group company that manages the respective social media channel is responsible for the processing of personal data; their contact details can be found either as a web link on the respective social media channel or in its information section.

In some cases, however, ZF is not solely responsible for the processing of data on social media channels. Therefore, we refer to the specific explanations in section VI of this data protection notice.

### III. Contact details of the data protection officer

To make an inquiry regarding the processing of your personal data, or if you want to exercise your rights mentioned in Section 7, please contact us by e-mail at: [privacy@zf.com](mailto:privacy@zf.com)

The contact details of our data protection officer are:

Data Protection Officer  
ZF Friedrichshafen AG  
Headquarters / ZF Forum  
Löwentaler Straße 20  
88046 Friedrichshafen  
Germany



#### **IV. Categories of personal data processed**

Depending on the way you contact us on our social media channels we process the following personal data:

- Communication data (e.g., your user name, comments, requests or email addresses or phone numbers, if provided to process a request).
- Other data necessary to clearly identify the person making the request and to properly respond to requests
- Interactions with our social media channels and their statistical evaluation via the analysis services of the respective social media providers (e.g. visits to our social media sites, the age/occupation groups of our visitors, the viewing time of our videos and how often the videos were played)

#### **V. Purposes of data processing and legal bases**

The processing of personal data on our social media channels serves the following purposes:

- Responding to requests/questions from visitors of the ZF social media channel.
- Communication with visitors of the ZF social media channel via comment functions
- Carrying out of campaigns (e.g. presentation of company information, marketing campaigns, competitions) on the respective ZF social media channel
- Establishment and enforcement of contractual obligations
- Exercise and/or defence of legal claims, legal disputes, or to resolve conflicts, to the extent necessary

The processing of personal data for the above mentioned purposes is based on the following legal bases:

Unless explicitly stated elsewhere, the processing of your data on our social media channels is based on our legitimate interests, according to Art. 6, para. 1f of the General Data Protection Regulation ("GDPR").

These interests consist of being able to offer appropriate information channels for ZF branding and presentation/illustration of our brands, products and campaigns, to be able to respond to requests and comments and, if necessary, to be able to refer them to the right contact person within the ZF Group. In addition, we customise the presentation on our pages to better fit the target group where possible.

Additionally, the processing of personal data may be based on Art. 6, para. 1b GDPR if a request indicates that users of a social media channel want to enter into a contractual relationship or to develop an existing contractual relationship.



## VI. Social-Media Channels

### 1. ZF on Facebook

The ZF Facebook pages are managed by Meta Platforms Ireland Limited; 4 Grand Canal Square; Grand Canal Harbour; Dublin 2 Ireland ("Meta"). When visiting our ZF Facebook pages, Meta processes personal data of the visitor. Meta provides the services on its platforms and is responsible for their structuring, functionality and for the processing of personal data there. For more information, please see Meta's privacy policy: <https://www.facebook.com/privacy/explanation>

Meta provides us with statistical evaluations via so-called page insights. These statistical evaluations are based on aggregated data and are therefore anonymized data for ZF, which we ourselves cannot trace back to individual users. This data helps us to evaluate the quality and content of our Facebook page. Meta has committed to ZF to primarily fulfil your rights under the GDPR and to provide the main information of our agreement. You can find more information about this and about page insights here: [https://www.facebook.com/legal/terms/information\\_about\\_page\\_insights\\_data](https://www.facebook.com/legal/terms/information_about_page_insights_data).

### 2. ZF on Instagram

The ZF Instagram pages are managed by Meta Platforms Ireland Limited; 4 Grand Canal Square; Grand Canal Harbour; Dublin 2 Ireland ("Meta"). When visiting our ZF Instagram pages, Meta processes personal data of the visitor. Meta provides the services on its platforms and is responsible for their structuring, functionality and for the processing of personal data there. For more information, please see Meta's privacy policy: <https://help.instagram.com/519522125107875>.

Meta provides us with statistical evaluations via so-called page insights. These statistical evaluations are based on aggregated data and are therefore anonymized data for ZF, which we ourselves cannot trace back to individual users. This data helps us to evaluate the quality and content of our Instagram page. Meta has committed to ZF to primarily fulfil your rights under the GDPR and to provide the main information of our agreement. You can find more information about this and about page insights here: [https://www.facebook.com/legal/terms/information\\_about\\_page\\_insights\\_data](https://www.facebook.com/legal/terms/information_about_page_insights_data).

### 3. ZF on X (formerly Twitter)

The ZF X pages (formerly Twitter) are managed by X Corp.; One Cumberland Place; Fenian Street; Dublin 2; D02 AX07; Ireland ("X"). When visiting our ZF X page, X processes personal data of the visitor. X provides the services on its platforms and is responsible for their structuring, functionality and for the processing of personal data there. For more information, please see Meta's privacy policy: <https://twitter.com/de/privacy>.



X provides us with statistical evaluations via so-called analytics data. These statistical evaluations are based on aggregated data and are therefore anonymized data for ZF, which we ourselves cannot trace back to individual users. This data helps us to evaluate the quality and content of our X page.

#### **4. ZF on YouTube**

The ZF YouTube pages are managed by Google Ireland Limited; Gordon House; Barrow Street; Dublin 4; Ireland ("YouTube"). When visiting our ZF YouTube channels, YouTube processes personal data of the visitor. YouTube provides the services on its platforms and is responsible for their structuring, functionality and for the processing of personal data there. For more information, please see YouTube's privacy policy: <https://policies.google.com/privacy?hl=de&gl=de>.

YouTube provides us with statistical evaluations via so-called analytics data. These statistical evaluations are based on aggregated data and are therefore anonymized data for ZF, which we ourselves cannot trace back to individual users. This data helps us to evaluate the quality and content of our YouTube channels.

#### **5. ZF on LinkedIn**

The ZF LinkedIn pages are managed by LinkedIn Ireland Unlimited Company; Wilton Place; Dublin 2; Ireland ("LinkedIn"). When visiting our ZF LinkedIn pages, LinkedIn processes personal data of the visitor. LinkedIn provides the services on its platforms and is responsible for their structuring, functionality and for the processing of personal data there. For more information, please see LinkedIn's privacy policy: [https://www.linkedin.com/legal/privacy-policy?trk=d\\_org\\_guest\\_company\\_overview\\_footer-privacy-policy](https://www.linkedin.com/legal/privacy-policy?trk=d_org_guest_company_overview_footer-privacy-policy).

LinkedIn provides us with statistical evaluations via so-called Page-Analytics-Data. These statistical evaluations are based on aggregated data and are therefore anonymized data for ZF, which we ourselves cannot trace back to individual users. This data helps us to evaluate the quality and content of our LinkedIn pages. LinkedIn has committed to ZF to primarily fulfil your rights under the GDPR and to provide the main information of our agreement. You can find more information about this and about Page-Analytics-Data here: <https://legal.linkedin.com/pages-joint-controller-addendum>.

#### **6. ZF on Xing**

The ZF Xing pages are managed by von New Work SE; Dammtorstraße 30; 20354 Hamburg; Deutschland ("Xing"). When visiting our ZF Xing pages, Xing processes personal data of the visitor. Xing provides the services on its platforms and is responsible for their structuring, functionality and for the processing of personal data there. For more information, please see Xing's privacy policy: <https://privacy.xing.com/de/datenschutzerklaerung>.



Xing provides us with statistical evaluations via so-called page insights. These statistical evaluations are based on aggregated data and are therefore anonymized data for ZF, which we ourselves cannot trace back to individual users. This data helps us to evaluate the quality and content of our Xing pages.

## **7. ZF on TikTok**

The ZF TikTok channels are managed by TikTok Technology Limited, 10 Earlsfort Terrace, Dublin, D02 T380, Ireland ("TikTok"). When visiting our ZF TikTok channels, TikTok processes personal data of the visitor. TikTok provides the services on its platforms and is responsible for their structuring, functionality and for the processing of personal data there. For more information, please see TikTok's privacy policy: <https://www.tiktok.com/legal/page/eea/privacy-policy/de-DE>.

TikTok provides us with statistical evaluations. These statistical evaluations are based on aggregated data and are therefore anonymized data for ZF, which we ourselves cannot trace back to individual users. This data helps us to evaluate the quality and content of our Xing pages.

## **VII. Data exchange within ZF Group**

We may forward requests from users of our social media channels to other ZF Group companies insofar as this is necessary to provide you with the right contact person for your request on the respective social media channel and/or to provide you with a targeted response to your request.

The processing of your requests via our social media channels may take place outside the control of your local jurisdiction and/or the European Economic Area if we receive a request that we need to pass on to one of our regional companies.

Here you can get an overview of the countries/regions in which ZF operates; you will also find an overview of the ZF Group companies:

<https://www.zf.com/locations>.

The intra-Group data transfer is secured by appropriate technical and organizational measures as well as by contractual agreements.

To manage our social media channels, we use a management tool from an external service provider (Sprinklr Germany, GmbH, Alter Wall 67 – 69, 20457 Hamburg, Germany). Communication on and with our social media channels is transferred to it and managed from there. We use this to ensure timely communication with our users.



If data protection in a third country is not recognized as adequate by the European Commission, or your local jurisdiction, ZF will take appropriate measures to ensure adequate protection of your data; this is done, for example, by concluding agreements including EU standard contractual clauses of the EU Commission for data transfer with recipients in third countries, which provide for appropriate protective measures. To request these standard clauses, please contact [privacy@zf.com](mailto:privacy@zf.com).

## VIII. Deletion of Data

In general, we delete personal data as soon as it is no longer necessary for the purposes for which it was initially collected or processed, unless we are required by law or another permissible reason to retain the data.

## IX. Data Protection Rights

Depending on and subject to applicable laws, you have certain rights regarding the processing of your personal data by ZF:

- you have the right to access the Personal Data ZF keeps about you – this is because ZF wants you to be aware of the Personal Data ZF has about you and to enable you to verify whether ZF processes your Personal Data in accordance with the applicable data protection laws and regulations;
- you have the right, under certain circumstances, to block or suppress further use of your Personal Data. When the processing is restricted, ZF can still store your Personal Data, but can no longer use it;
- if your Personal Data is inaccurate or incomplete, you have the right to request the rectification of your Personal Data;
- you have the right, under certain circumstances, to request the deletion or removal of your Personal Data from ZF systems;
- if ZF's processing of your Personal Data is based specifically on your consent, you have the right to withdraw that consent at any time. This includes your right to withdraw consent to ZF's use of your Personal Data for direct marketing purposes;
- you have the right to obtain from ZF, under certain circumstances, your Personal Data in a structured, commonly used and machine-readable form so you can reuse it for your own purposes across different services;
- you also have the **right to object** to certain types of processing, including processing for direct marketing purposes.



However, note that ZF may need to retain certain Personal Data, for example for legal or administrative purposes (e.g. keeping of accounting records).

You can exercise these rights at any time by contacting the ZF Data Protection Officer (see Section III. above). For all requests set out above, please send us a letter or email with “Data Subject Request” in the subject line.

You also have the right to lodge a complaint about the way ZF handles or processes your Personal Data with your national data protection authority.

#### **X. Changes to this data protection notice**

As the processing of your data by ZF may change over time, this may also result in changes to this data protection notice in order to reflect the current status of the processing of your personal data at all times. Therefore, please read this data protection notice again from time to time.

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