

Data Protection

1. Data protection at a glance

General information

The following information provides a simple overview of what happens to your personal data when you visit this website. Personal data is all data with which you can be personally identified. For detailed information on the subject of data protection, please refer to our privacy policy listed below this text.

Data collection on this website

Who is the responsible party for data collection on this website?

Data processing on this website is carried out by the website operator. You can find their contact details in the "Information on the controller" section of this privacy policy.

How do we collect your data?

On this website, your data is collected when you provide it to us. This may be data that you enter in a contact form, for example.

Other data is collected automatically or with your consent by our IT systems when you visit the website. This is primarily technical data (e.g. internet browser, operating system or time of page view). This data is collected automatically as soon as you enter this website.

What do we use your data for?

Some of the data is collected to ensure that the website is provided without errors. Other data may be used to analyze your user behavior.

What rights do you have regarding your data?

You have the right to receive information about the origin, recipient and purpose of your stored personal data free of charge at any time. You also have the right to request the correction or deletion of this data. If you have given your consent to data processing, you can revoke this consent at any time for the future. You also have the right to request the restriction of the processing of your personal data under certain circumstances. You also have the right to lodge a complaint with the competent supervisory authority.

You can contact us at any time if you have any further questions about data protection.

2. Hosting

We are hosting the content of our website at the following provider:

Amazon Web Services (AWS)

The provider is the Amazon Web Services EMEA SARL, 38 Avenue John F. Kennedy, 1855 Luxembourg (hereinafter referred to as "AWS").

When you visit our website, your personal data will be processed on AWS servers. This may also result in the transfer of personal data to the parent company of AWS in the United States. The transfer of data to the US is based on the EU's standard contractual clauses. For details please consult: <https://aws.amazon.com/de/blogs/security/aws-gdpr-data-processing-addendum/>

For more information, please see the AWS Data Privacy

Policy: https://aws.amazon.com/de/privacy/?nc1=f_pr

The use of AWS is based on Art. 6 para. 1 lit. f GDPR. We have a legitimate interest in displaying our website as reliably as possible. If a corresponding consent has been requested, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a GDPR and § 25 para. 1 TTDSG, insofar as the consent includes the storage of cookies or access to information in the user's terminal device (e.g. device fingerprinting) within the meaning of the TTDSG. Consent can be revoked at any time. The company is certified in accordance with the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following

link: <https://www.dataprivacyframework.gov/s/participant-search/participant-detail?contact=true&id=a2zt0000000TOWQAA4&status=Active>

Data processing

We have concluded a data processing agreement (DPA) for the use of the above-mentioned service. This is a contract prescribed by data protection law, which ensures that it processes the personal data of our website visitors only in accordance with our instructions and in compliance with the GDPR.

3. General information and mandatory information

Data protection

The operators of these pages take the protection of your personal data very seriously. We treat your personal data confidentially and in accordance with the statutory data protection regulations and this privacy policy.

When you use this website, various personal data is collected. Personal data is data that can be used to identify you personally. This privacy policy explains what data we collect and what we use it for. It also explains how and for what purpose this is done.

We would like to point out that data transmission over the Internet (e.g. when communicating by email) may be subject to security vulnerabilities. Complete protection of data against access by third parties is not possible.

Information about the responsible party (referred to as the “controller” in the GDPR)

The data processing controller on this website is:

Stella Circle GmbH; Rosenstr. 2; 10178 Berlin

Phone: +49 30 7543 8820; E-Mail: agency@stellacircle.com.

The controller is the natural person or legal entity that single-handedly or jointly with others makes decisions as to the purposes of and resources for the processing of personal data (e.g., names, e-mail addresses, etc.).

Storage duration

Unless a more specific storage period has been specified in this privacy policy, your personal data will remain with us until the purpose for data processing no longer applies. If you assert a justified request for deletion or revoke your consent to data processing, your data will be deleted unless we have other legally permissible reasons for storing your personal data (e.g. retention periods under tax or commercial law); in the latter case, the deletion will take place after these reasons no longer apply.

General information on the legal basis for the data processing on this website

If you have consented to data processing, we process your personal data on the basis of Art. 6 para. 1 lit. a GDPR or Art. 9 para. 2 lit. a GDPR, insofar as special categories of data are processed in accordance with Art. 9 para. 1 GDPR. In the event of express consent to the transfer of personal data to third countries, data processing is also carried out on the basis of Art. 49 para. 1 lit. a GDPR. If you have consented to the storage of cookies or access to information in your end device (e.g. via device fingerprinting), the data processing is also carried out on the basis of Section 25 (1) TTDSG. Consent can be revoked at any time. If your data is required to fulfill the contract or to carry out pre-contractual measures, we process your data on the basis of Art. 6 para. 1 lit. b GDPR. Furthermore, we process your data if this is necessary to fulfill a legal obligation on the basis of Art. 6 para. 1 lit. c GDPR. Data processing may also be carried out on the basis of our legitimate interest in accordance with Art. 6 para. 1 lit. f GDPR. Information on the relevant legal bases in each individual case is provided in the following paragraphs of this privacy policy.

Information on the data transfer to third-party countries that are not secure under data protection law and the transfer to US companies that are not DPF- certified

Among other things, we use tools from companies based in third countries that are not secure under data protection law and US tools whose providers are not certified under the EU-US Data Privacy Framework (DPF). If these tools are active, your personal data may be transferred to these countries and processed there. We would like to point out that no level of data protection comparable to that in the EU can be guaranteed in third countries that are unsafe under data protection law.

We would like to point out that the USA, as a safe third country, generally has a level of data protection comparable to that of the EU. Data transfer to the USA is therefore permitted if the

recipient is certified under the "EU-US Data Privacy Framework" (DPF) or has suitable additional guarantees. Information on transfers to third countries, including the data recipients, can be found in this privacy policy.

Recipients of personal data

As part of our business activities, we work together with various external bodies. In some cases, it is also necessary to transfer personal data to these external bodies. We only pass on personal data to external bodies if this is necessary for the fulfillment of a contract, if we are legally obliged to do so (e.g. passing on data to tax authorities), if we have a legitimate interest in the transfer in accordance with Art. 6 para. 1 lit. f GDPR or if another legal basis permits the transfer of data. When using processors, we only pass on our customers' personal data on the basis of a valid contract for order processing. In the case of joint processing, a joint processing agreement is concluded.

Withdrawal of your consent to data processing

Many data processing operations are only possible with your express consent. You can withdraw your consent at any time. The legality of the data processing carried out until the revocation remains unaffected by the revocation..

Right to object to the collection of data in special cases; right to object to direct advertising (Art. 21 GDPR)

If the data processing is based on Art. 6 Abs. 1 Lit. e or f GDPR, you have the right to object to the processing of your personal data at any time on grounds relating to your particular situation; this also applies to profiling based on these provisions. The respective legal basis on which processing is based can be found in this Privacy Policy. If you object, we will no longer process your personal data concerned unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims (objection pursuant to Art. 21 (1) GDPR).

If your personal data are processed for the purpose of direct marketing, you have the right to object at any time to the processing of personal data concerning you for the purpose of such marketing; this also applies to profiling to the extent that it is related to such direct marketing. If you object, your personal data will subsequently no longer be used for the purpose of direct marketing (objection pursuant to Art. 21 para. 2 GDPR).

Right to log a complaint with the competent supervisory agency

In the event of violations of the GDPR, data subjects have the right to lodge a complaint with a supervisory authority, in particular in the Member State of their habitual residence, place of work or place of the alleged violation. The right to lodge a complaint is without prejudice to any other administrative or judicial remedies.

Right to data portability

You have the right to have data that we process automatically on the basis of your consent or in fulfillment of a contract handed over to you or to a third party in a common, machine-readable format. If you request the direct transfer of the data to another controller, this will only be done insofar as it is technically feasible.

Information, correction, and deletion

Within the framework of the applicable legal provisions, you have the right at any time to free information about your stored personal data, its origin and recipient and the purpose of the data processing and, if necessary, a right to correction or deletion of this data. You can contact us at any time if you have further questions on the subject of personal data.

Right to demand processing restrictions

You have the right to request the restriction of the processing of your personal data. You can contact us at any time to do this. The right to restriction of processing exists in the following cases:

- If you dispute the accuracy of your personal data stored by us, we usually need time to check this. For the duration of the review, you have the right to request that the processing of your personal data be restricted.
- If the processing of your personal data was/is unlawful, you can request the restriction of data processing instead of erasure.
- If we no longer need your personal data, but you need it for the exercise, defense or assertion of legal claims, you have the right to request the restriction of the processing of your personal data instead of deletion.
- If you have lodged an objection in accordance with Art. 21 para. 1 GDPR, a balance must be struck between your interests and ours. As long as it has not yet been determined whose interests prevail, you have the right to request the restriction of the processing of your personal data.

If you have restricted the processing of your personal data, this data - apart from its storage - may only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the European Union or of a Member State.

SSL and/or TLS encryption

This site uses SSL or TLS encryption for security reasons and to protect the transmission of confidential content, such as orders or inquiries that you send to us as the site operator. You can recognize an encrypted connection by the fact that the address line of the browser changes from "http://" to "https://" and by the lock symbol in your browser line.

If SSL or TLS encryption is activated, the data you transmit to us cannot be read by third parties.

Objection to advertising e-mails

We hereby object to the use of contact data published as part of our obligation to provide a legal notice for the purpose of sending unsolicited advertising and information material. The operators of the website expressly reserve the right to take legal action in the event of the unsolicited sending of advertising information, such as spam e-mails.

4. Data collection on this website

Cookies and External Services

Our website uses so-called "cookies." Cookies are small data packets that are stored on Your device and do not cause any harm. We use both technically necessary cookies and - with Your

consent – cookies from third-party providers to ensure the functionality of our website and enhance Your user experience.

Cookies may be stored either temporarily for the duration of a session ("session cookies") or permanently ("persistent cookies"). Session cookies are automatically deleted after Your visit ends. Persistent cookies remain stored on Your device until You delete them manually or automatic deletion occurs via Your web browser.

Technically necessary cookies, such as our first-party cookie to store Your cookie preferences, are set based on Art. 6(1)(f) GDPR. We have a legitimate interest in the technically error-free and optimized provision of our website.

In addition, we use the following external services – only with Your explicit consent:

Elfsight

To integrate LinkedIn posts, we use widgets from the third-party provider Elfsight (Elfsight LLC). These allow us to display social media content directly on our website. Elfsight may collect personal data such as Your IP address and browser information. For more details, please refer to Elfsight's privacy policy: <https://elfsight.com/privacy-policy>.

Fluent

We use the Fluent service for language selection on our website. This service stores Your preferred language setting in a cookie to automatically display the website in Your chosen language during future visits.

Cookiebot

To manage Your cookie consent preferences, we use Cookiebot by Usercentrics A/S. This service stores Your consent choices in a cookie and ensures that only the cookies You have approved are used. More information is available at: <https://www.cookiebot.com/en/privacy-policy>.

The use of these services is based solely on Your consent in accordance with Art. 6(1)(a) GDPR and § 25(1) TTDSG. You can withdraw Your consent at any time via the cookie banner on our website.

You can configure Your browser to inform You about the use of cookies, allow cookies only in individual cases, exclude the acceptance of cookies for certain cases or generally, and activate automatic deletion of cookies when closing the browser. Please note that disabling cookies may limit the functionality of our website.

Server log files

The provider of the pages automatically collects and stores information in so-called server log files, which your browser automatically transmits to us. These are

- The type and version of browser used
- The used operating system
- Referrer URL
- The hostname of the accessing computer
- The time of the server inquiry
- The IP address

This data is not merged with other data sources.

This data is recorded on the basis of Art. 6(1)(f) GDPR. The operator of the website has a legitimate interest in the technically error free depiction and the optimization of the operator's website. In order to achieve this, server log files must be recorded.

Contact form

If you send us inquiries via the contact form, your details from the inquiry form, including the contact details you provide there, will be stored by us for the purpose of processing the inquiry and in the event of follow-up questions. We will not pass on this data without your consent.

This data is processed on the basis of Art. 6 para. 1 lit. B GDPR if your request is related to the fulfillment of a contract or is necessary for the implementation of pre-contractual measures. In all other cases, the processing is based on our legitimate interest in the effective processing of the requests addressed to us (Art. 6 para. 1 lit. F GDPR) or on your consent (Art. 6 para. 1 lit. A GDPR) if this has been requested; the consent can be revoked at any time.

This data is not merged with other data sources.

Request by e-mail or telephone

If you contact us by e-mail or telephone, we will store and process your request, including all resulting personal data (name, request) for the purpose of processing your request. We will not pass on this data without your consent.

This data is processed on the basis of Art. 6 para. 1 lit. b GDPR if your request is related to the fulfillment of a contract or is necessary for the implementation of pre-contractual measures. In all other cases, the processing is based on our legitimate interest in the effective processing of the

inquiries addressed to us (Art. 6 para. 1 lit. f GDPR) or on your consent (Art. 6 para. 1 lit. a GDPR) if this has been requested; consent can be revoked at any time.

The data you send to us via contact requests will remain with us until you ask us to delete it, revoke your consent to storage or the purpose for data storage no longer applies (e.g. after your request has been processed). Mandatory statutory provisions - in particular statutory retention periods - remain unaffected.

Communication via WhatsApp

For communication with our customers and other third parties, we use the instant messaging service WhatsApp, among others. The provider is WhatsApp Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

Communication takes place via end-to-end encryption (peer-to-peer), which prevents WhatsApp or other third parties from gaining access to the communication content. However, WhatsApp receives access to metadata that is created in the course of the communication process (e.g. sender, recipient and time). We would also like to point out that WhatsApp states that it shares personal data of its users with its parent company Meta, which is based in the USA. Further details on data processing can be found in WhatsApp's privacy policy at: <https://www.whatsapp.com/legal/#privacy-policy>.

The use of WhatsApp is based on our legitimate interest in communicating as quickly and effectively as possible with customers, interested parties and other business and contractual partners (Art. 6 para. 1 lit. f GDPR). If a corresponding consent has been requested, the data processing takes place exclusively on the basis of the consent; this can be revoked at any time with effect for the future.

The communication content exchanged between you and us on WhatsApp will remain with us until you ask us to delete it, revoke your consent to storage or the purpose for data storage no

longer applies (e.g. after your request has been processed). Mandatory statutory provisions - in particular retention periods - remain unaffected.

The company is certified in accordance with the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the USA, which is intended to ensure compliance with European data protection standards for data processing in the USA. Every company certified under the DPF undertakes to comply with these data protection standards. Further information on this can be obtained from the provider at the following link: <https://www.dataprivacyframework.gov/s/participant-search/participant-detail?contact=true&id=a2zt00000011sfnAAA&status=Active%20>

We use WhatsApp in the "WhatsApp Business" version.

Data transfer to the USA is based on the standard contractual clauses of the EU Commission. You can find details here: <https://www.whatsapp.com/legal/business-data-transfer-addendum>

We have set up our WhatsApp accounts so that it does not automatically synchronize data with the address book on the smartphones in use.

We have concluded an order processing contract (AVV) with the above-mentioned provider.

Communication via Signal

For communication with our customers and other third parties, we use the instant messaging service Signal, among others. The provider is Privacy Signal Messenger, LLC 650 Castro Street, Suite 120-223 Mountain View, CA 94041.

Communication takes place via end-to-end encryption (peer-to-peer), which prevents Signal or other third parties from gaining access to the communication content. However, Signal receives access to metadata that is created during the communication process (e.g. sender, recipient and time). Further details on data processing can be found in Signal's privacy policy at <https://signal.org/legal/#privacy-policy>.

Signal is used on the basis of our legitimate interest in communicating as quickly and effectively as possible with customers, interested parties and other business and contractual partners (Art. 6 para. 1 lit. f GDPR). If a corresponding consent has been requested, the data processing takes place exclusively on the basis of the consent; this can be revoked at any time with effect for the future.

The communication content exchanged between you and us on Signal will remain with us until you ask us to delete it, revoke your consent to storage or the purpose for data storage no longer applies (e.g. after your request has been processed). Mandatory statutory provisions - in particular retention periods - remain unaffected.

Registration on this website

You can register on this website in order to use additional functions on the site. We will only use the data you enter for the purpose of using the respective offer or service for which you have registered. The mandatory information requested during registration must be provided in full. Otherwise we will reject the registration.

We will use the e-mail address provided during registration to inform you of important changes, such as changes to the scope of the offer or technically necessary changes.

The data entered during registration is processed for the purpose of implementing the user relationship established by the registration and, if necessary, for the initiation of further contracts (Art. 6 para. 1 lit. b GDPR).

The data collected during registration will be stored by us for as long as you are registered on this website and will then be deleted. Statutory retention periods remain unaffected.

5. Newsletter

Newsletter data

If you would like to receive any newsletter offered on the website, we require an e-mail address from you as well as information that allows us to verify that you are the owner of the e-mail address provided and that you agree to receive the newsletter. No further data is collected, or only on a voluntary basis. We use this data exclusively for sending the requested information and do not pass it on to third parties.

The data entered in the newsletter registration form is processed exclusively on the basis of your consent (Art. 6 para. 1 lit. a GDPR). You can revoke your consent to the storage of the data, the e-mail address and its use for sending the newsletter at any time, for example via an "unsubscribe" link in the newsletter. The legality of the data processing operations that have already taken place remains unaffected by the revocation.

The data you provided to us for the purpose of subscribing to the newsletter will be stored by us until you unsubscribe from the newsletter with us or the newsletter service provider. After unsubscribing from the newsletter or when the purpose no longer applies, the data will be deleted from the newsletter distribution list. We reserve the right to delete or block email addresses from our newsletter distribution list at our discretion within the scope of our legitimate interests according to Article 6(1)(f) GDPR.

Data stored with us for other purposes remains unaffected by this.

After you unsubscribe from the newsletter distribution list, your email address may be stored by us or the newsletter service provider in a blacklist, if necessary to prevent future mailings. The data from the blacklist is used only for this purpose and is not merged with other data. This serves both your interest and our interest in complying with legal requirements when sending newsletters (legitimate interest within the meaning of Article 6(1)(f) GDPR). The storage in the blacklist is not limited in time. You can object to the storage if your interests outweigh our legitimate interest.

6. Luna-, Stella- und Nova Memberships

Processing of Customer and Contract Data

We collect, process, and use personal customer and contract data to establish, shape the content of, and modify our contractual relationships. Personal data regarding the use of this website (usage data) is only collected, processed, and used to the extent necessary to enable or bill the user for the use of the service. The legal basis for this is Article 6(1)(b) GDPR.

The collected customer data will be deleted after the completion of the order or termination of the business relationship and the expiration of any applicable legal retention periods. Legal retention periods remain unaffected.

Data transmission upon conclusion of service contracts

We only transmit personal data to third parties if it is necessary within the scope of contract processing, such as to the financial institution responsible for payment processing.

Further transmission of the data does not occur, or only if you have expressly consented to the transmission. Your data will not be disclosed to third parties for advertising purposes without explicit consent.

The basis for data processing is Article 6(1)(b) GDPR, which permits the processing of data for the performance of a contract or pre-contractual measures.

7. Audio and Video Conferences

Data processing

For communication with our customers, we use, among other tools, online conferencing tools. The specific tools used by us are listed below. If you communicate with us via internet video or audio conferencing, your personal data will be collected and processed by us and the provider of the respective conferencing tool.

The conferencing tools collect all data that you provide/use for the use of the tools (email address and/or your phone number). Additionally, the conferencing tools process the duration of the conference, the start and end (time) of participation in the conference, the number of participants, and other "contextual information" related to the communication process (metadata).

Furthermore, the tool provider processes all technical data necessary for the online communication transaction. This includes, in particular, IP addresses, MAC addresses, device IDs, device type, operating system type and version, client version, camera type, microphone or speaker information, and the type of connection.

If content is exchanged, uploaded, or otherwise provided within the tool, it is also stored on the servers of the tool providers. Such content includes, in particular, cloud recordings, chat/instant messages, voicemails, uploaded photos and videos, files, whiteboards, and other information shared during the use of the service.

Please note that we do not have full control over the data processing operations of the tools used. Our capabilities depend significantly on the company policy of the respective provider. For further information on the data processing by the conferencing tools, please refer to the privacy policies of the tools listed below this text.

Purpose and Legal Basis:

The conferencing tools are used to communicate with potential or existing contractual partners or to offer specific services to our customers (Art. 6(1)(b) GDPR). Furthermore, the use of these tools serves the general simplification and acceleration of communication with us or our company (legitimate interest within the meaning of Art. 6(1)(f) GDPR). If consent has been obtained, the use of the respective tools is based on this consent; the consent can be revoked at any time with effect for the future.

Storage Duration:

The data directly collected by us through video and conference tools will be deleted from our systems as soon as you request deletion, revoke your consent to storage, or the purpose for data storage no longer applies. Stored cookies remain on your device until you delete them. Mandatory legal retention periods remain unaffected.

We have no influence on the storage duration of your data stored by the operators of the conference tools for their own purposes. For details, please refer directly to the operators of the conference tools.

Conference Tools Used:

We use the following conference tools:

Microsoft Teams

We generally use Microsoft Teams. The provider is Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland. Details on data processing can be found in Microsoft Teams' privacy policy: [Microsoft Teams Privacy Statement](#). The company is certified under the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the USA that aims to ensure compliance with European data protection standards for data processing in the USA. Each company certified under the DPF commits to adhering to these data protection standards. Further information can be obtained from the provider at the following link: [Data Privacy Framework - Participant Detail](#).

Data Processing Agreement

We have concluded a Data Processing Agreement (DPA) for the use of the above-mentioned service. This is a legally required contract that ensures that the service processes the personal data of our website visitors only according to our instructions and in compliance with the GDPR.

8. Handling applicant data

We offer you the opportunity to apply with us (e.g., via email, postal mail, or through an online application form). Below, we inform you about the scope, purpose, and use of your personal data collected during the application process. We assure you that the collection, processing, and use of your data comply with applicable data protection laws and all other legal provisions, and your data will be treated strictly confidentially.

Scope and Purpose of Data Collection:

When you submit an application to us, we process the associated personal data (e.g., contact and communication details, application documents, notes from job interviews, etc.) as far as necessary for deciding on the establishment of an employment relationship. The legal basis for this is § 26 BDSG under German law (initiation of an employment relationship), Art. 6(1)(b) GDPR (general initiation of a contract), and – if you have given consent – Art. 6(1)(a) GDPR. Consent can be revoked at any time. Your personal data will only be shared within our company with individuals involved in the processing of your application.

If the application is successful, the data you submitted will be stored in our data processing systems for the purpose of carrying out the employment relationship, based on § 26 BDSG and Art. 6(1)(b) GDPR.

Data Retention Period

If we cannot offer you a position, you reject an offer, or you withdraw your application, we reserve the right to retain the data you provided based on our legitimate interests (Art. 6(1)(f)).

GDPR) for up to 6 months after the end of the application process (rejection or withdrawal of the application). Afterward, the data will be deleted, and physical application documents will be destroyed. The retention serves particularly for evidential purposes in the event of a legal dispute. If it becomes apparent that the data will be needed after the 6-month period (e.g., due to a pending legal dispute), deletion will occur once the purpose for extended retention no longer applies.

Extended retention may also take place if you have given corresponding consent (Art. 6(1)(a) GDPR) or if legal retention obligations prevent deletion.

Inclusion in the Applicant Pool

If we cannot offer you a position, there may be an option to include you in our applicant pool. In the case of inclusion, all documents and information from the application will be transferred to the applicant pool for contact in the event of suitable vacancies.

Inclusion in the applicant pool is solely based on your explicit consent (Art. 6(1)(a) GDPR). Giving consent is voluntary and unrelated to the ongoing application process. You can revoke your consent at any time. In this case, the data from the applicant pool will be irrevocably deleted unless there are legal retention reasons.

Data from the applicant pool will be irrevocably deleted at the latest two years after consent has been granted.