

Data Protection

Following section 11 of the German Data Protection Act (Bundesdatenschutzgesetz – in the following BDSG) Service Providers that process personal data on behalf of owners of addresses have to fulfill certain technical and organizational measures. Zelos B.V. Direct Mail Services fulfills this obligation through implementation of the following measures:

a. Access to Building

Access to the building is only possible with security-keys, which are handed out only to selected employees. Visitors cannot enter the building alone, and are always accompanied by an employee.

b. Access to IT-Systems

Access to the IT system of Zelos B.V. Direct Mail Services is secured by a firewall. All of the PCs are secured by passwords. Passwords have to meet high standards and have to be changed on regular basis. Already used passwords cannot be used again.

c. Limited Access to Data

Zelos B.V. Direct Mail Services will restrict access to the data to such approved employees as strictly need to have access for the purpose of the project and Zelos B.V. Direct Mail Services will impose upon all such persons obligations of confidentiality pursuant to paragraph 5 BDSG. The Data Processor will be responsible for ensuring that all such persons comply with these obligations.

d. Transfer of Data

Personal data will only be transferred by the Data Processor over SSL-secured SFTP-Server. A transfer via e-mail will be encoded. The password will be transferred separately.

e. Input control

Zelos B.V. Direct Mail Services keeps strict documentation of which employee performs what work on the personal data. Access to certain personal data is only granted to employees who work on the certain project. The different steps of the work process are documented, so transparency can be guaranteed.

f. Order control

Personal data will only be processed and used following the purpose, for which they were transmitted.

g. Data Security

Our computer systems are secured against data loss by RAID-systems. Daily back-ups guarantee that in case of failure of our computer systems no data will be lost. The back-ups are stored in a separate area from the servers, in case of a fire.

h. Separate Processing of Personal Data

To secure the separate processing of different personal data, Zelos B.V. Direct Mail Services guarantees that all orders will be handled in different folders as well as different network directories to prevent accidental misuse of personal data.

i. Deletion of personal data

The Zelos B.V. Direct Mail Services deletes all delivered Address Data completely (also in e-mails, from communication servers, clients or production computers as well as all intermediate files created in the course of the data processing or any designations on reference copies), as soon as the order is completed. The date of the last postal delivery shall be communicated to the Service Provider, if it is not clear from the provision of the services under the Order. Backup copies which may only be used pursuant to the written orders of the Address Owner (e.g. in the context of an order to store the Data for purposes of providing information pursuant to Section 34 Para. 1a Sentence 1 BDSG) are exempt from this term. Upon request, the deletion of data shall be confirmed in writing. Pursuant to Section 35 Para. 3 BDSG, deletion shall be substituted by blocking of data.

j. Verpflichtungserklärung

Zelos B.V. Direct Mail Services signed the Verpflichtungserklärung from the Deutschen Dialogmarketing Verband e.V. (DDV) and transmitted it to the DDV for publication. The Verpflichtungserklärung can be found [here](#).

If you have more questions concerning the processing of personal data and the compliance of Zelos B.V. Direct Mail Services with the applicable law, please contact the managing director.