

Privacy Policy for Microsoft365 Cloud Services

This privacy policy informs you about our treatment of personal data when using Microsoft365 cloud services provided by Roland Berger. This comprises – among others - Microsoft Teams, Microsoft OneDrive, Microsoft Forms, Microsoft PowerBI, Microsoft SharePoint Online, Microsoft Stream (hereinafter "Microsoft365 Cloud Services").

Please also make sure you have read our [Terms of use](#) for the Microsoft365 Cloud Services.

Please also refer to our [Privacy Policy for Telephone Conferences and Webinars via "Microsoft Teams"](#) when participating in online meetings via Microsoft Teams organized by Roland Berger.

1. Name and contact details of the controller and the data protection officer

The controller for processing the personal data in relating to the use of Microsoft365 Cloud Services is Roland Berger Holding GmbH & Co. KGaA, Sederanger 1, 80538 Munich, Germany or one of its subsidiaries (hereinafter "Roland Berger", "we", "us" or "our"). The addresses and names of our subsidiaries can be found [here](#).

You can contact our Data Protection Officer at the aforementioned address or at this email address: dataprotection@rolandberger.com

Please note that this Privacy Policy only provides information about the processing of your personal data when you use Microsoft applications provided by us. Should you require information about processing by Microsoft, please refer to Microsoft's privacy policy at <https://privacy.microsoft.com/en-us/privacystatement> for more information.

2. Processing of personal data

2.1 Usage data

We may process the following usage data recorded by Microsoft:

- Your IP address, which is used to access the Microsoft365 Cloud Services.
- Your username (access data to Microsoft365 Cloud Services), data within the scope of the so-called multi-factor authentication, which you have stored in your Microsoft account (e.g., optionally your (private) mobile phone number).
- Identification features: Information about you that identifies you as a user, sender, or recipient of data within the Microsoft365 Cloud Services. This includes, in particular, the following master data: Last name, first name, contact details including telephone number, email address, office fax number, if provided by you. Other information (such as a profile picture, if you have one) can also be viewed in your profile at any time.

- Data required for authentication and for the use of the license. In the Microsoft365 Cloud Services, all user activities such as time of access, date, type of access, information about the data/files/documents accessed and all activities in connection with the use, such as creating, changing, deleting a document, setting up a team (and channels in teams), taking notes in the notebook, starting a chat and replying in the chat are processed.

The processing serves our legitimate interest (Art. 6 para. 1 sentence 1 lit. f of the General Data Protection Regulation (GDPR)) in analyzing the use of Microsoft365 Cloud Services and ensuring the best possible presentation of these services for our users.

2.2 Other data processing

As part of the provision of our services related to Microsoft365 Cloud Services, we process the personal data made available there, such as those contained in your communications, lists, tasks, and files/documents. The data is processed for the performance of a contract (Art. 6 para. 1 sentence 1 lit. b GDPR) because it is necessary for the provision of our services and the offering of Microsoft365 Cloud Services.

3. Transfer of personal data

3.1 Transfer of personal data to service providers

Where we use service providers to assist us in processing personal data or otherwise (for example, web designers, hosting providers or other IT service providers) and they may have access to your personal data, this will only be done after entering into a so-called data processing agreement that requires our service providers to process personal data only in accordance only with our instructions and to keep such data confidential. Processors will only have access to the personal data they need to perform their services for us.

Microsoft as our data processor necessarily obtains knowledge of the above-mentioned usage data, therefore we have concluded a data processing agreement with Microsoft that complies with the requirements of Art. 28 GDPR. The processing of personal data by Microsoft takes place exclusively on servers located in the EU.

3.2 Transfer of data to third parties

In other cases, we will only transfer your personal data if this is permitted by relevant legal provisions, if we are obliged to do so, for example by law or by an official or court order (Art. 6 para. 1 sentence 1 lit. c GDPR) or if you have consented to the transfer (Art. 6 para. 1 sentence 1 lit. a GDPR).

3.3 Data transfer to countries outside the EEA

If we transfer personal data to a country outside the European Economic Area (EEA), we will only do so after ensuring that appropriate safeguards are in place, for example in the form of standard data protection clauses.

4. Duration of data storage

Generally speaking, when your data is no longer necessary for the purpose for which it was originally collected and there are no statutory retention periods or other statutory grounds for further retention, your data will be routinely erased or anonymized. Reasons for further retention may be, for example, reasons of public interest or the assertion, exercise or defense of legal claims.

Login data and IP addresses will be deleted after 30 days at the latest, audit logs after 90 days, unless we are entitled or obligated to store them longer.

5. Your rights

You have the right:

- to obtain information regarding the personal data that we store about you at all times.
- to demand rectification of inaccurate data or supplementation of incomplete data.
- to demand erasure or restriction of personal data relating to you.
- to have the data you provided, which we process based on your consent or in the performance of a contract, handed to you or a third party in a commonly used, machine-readable format. If you demand the direct transfer of the data to another controller, it will be done to the extent technically feasible.
- to lodge a complaint with a supervisory authority.
- if your personal data is processed based on legitimate interests pursuant to Art. 6 para. 1 sentence 1 lit. f GDPR, to object to the processing of your personal data pursuant to Article 21 GDPR on grounds relating to your particular situation.

6. Updates to this privacy policy

This privacy policy is regularly reviewed and updated. We therefore reserve the right to amend it from time to time and to make changes in the collection, processing, or use of your data. The most current version of this privacy policy is always available at:

https://www.rolandberger.com/publications/publication_pdf/MS365Cloud_Data_Protection_Notice.pdf

Last update: May 2023