

**1**  
Basic contract

**2**  
GTC or deviating contractual provisions

**3**  
Agreement on the Processing of Personal Data on behalf of a Controller (DPA) and detailed description of the product sheet

**NEW!**

# IMPORTANT INFORMATION REGARDING THE AGREEMENT ON THE PROCESSING OF PERSONAL DATA ON BEHALF OF A CONTROLLER (DPA)

**in connection with the entry into force of Regulation (EU) 2016/679 (General Data Protection Regulation/GDPR) as of 25 May 2018**

Dear Customer,

When we process personal data provided by you on your behalf and in your capacity as the controller pursuant to the provisions of Regulation (EU) 2016/679 (General Data Protection Regulation/GDPR), we are your processor\* depending on the service agreed in the basic contract.

Even before comprehensive and binding data protection regulations have been in place for all enterprises. The new thing is that since legal force of the GDPR a contractual agreement between the controller (you) and the processor (us) has been required. Such agreement may be concluded both in writing and electronically. By means of this information letter we fulfil the obligation to enter into such an agreement.

Please find below specific product and service sheets of the APA Group entities disclosing both the types of data and the sub-processors which we use for performance of the basic contract concluded with you. The part that is relevant to you is to be understood as an integral part of the DPA to be concluded with you on the basis of the GDPR pursuant to Art. 28 GDPR.

The Agreement on the Processing of Personal Data on behalf of a Controller (DPA) applicable to the service/product agreed from time to time can be found at <https://www.apa.at/Site/Kontakt/Auftragsverarbeitung.de.html>.

That Agreement does not change the existing contractual relationship between you and APA in any way. By concluding the same we merely fulfil our mutual statutory obligations as laid down in the GDPR.

If you have any questions, please do not hesitate to contact our Data Protection Officer at [datenschutzbeauftragte@apa.at](mailto:datenschutzbeauftragte@apa.at).

\*According to the current provisions of the Austrian Data Protection Act [DSG] the term of processor [Auftragsverarbeiter] pursuant to the GDPR replaces the previous term of processor [Dienstleister] pursuant to the DSG.

APA Agreement on the Processing of Personal Data on behalf of a Controller (DPA):  
<https://www.apa.at/Site/Kontakt/Auftragsverarbeitung.de.html>  
Access is restricted; the access data is as follows: Username: apa Password: avv

## Products and services of APA-Austria Presse Agentur eG

APA Basic Service and APA Basic Digital Service	Category of data subjects	Category of types of data	Sub-processors
You have access to APA Basic Service for internal use or editorial exploitation according to the basic contract.	Controller's staff	<ul style="list-style-type: none"> <li>- Information on the controller</li> <li>- Information on the data subject</li> <li>- Contact details</li> <li>- Access data</li> <li>- Contents retrieved</li> <li>- Computing time of retrieval</li> <li>- Location</li> <li>- Client information</li> <li>- Registration information and</li> <li>- Log data</li> <li>- Information on the retrieved article</li> <li>- Search parameters</li> <li>- Search results</li> <li>- AOM alert yes/no</li> <li>- Text message alert yes/no</li> <li>- Notification yes/no</li> </ul>	APA-IT Informations-technologie GmbH, Laimgrubengasse 10, 1060 Vienna for technical implementation.

APA MultiMedia Lines, APA Finance Services, CEE Business Line	Category of data subjects	Category of types of data	Sub-processors
You have access to one of the services stated above for internal use or editorial exploitation according to the basic contract.	Controller's staff	<ul style="list-style-type: none"> <li>- Information on the controller</li> <li>- Information on the data subject</li> <li>- Contact details</li> <li>- Access data</li> <li>- Contents retrieved</li> <li>- Registration information and</li> <li>- Log data</li> <li>- Information on the retrieved article</li> <li>- Search parameters</li> <li>- Search results</li> </ul>	APA-IT Informations-technologie GmbH, Laimgrubengasse 10, 1060 Vienna for technical implementation.

APA-Science	Category of data subjects	Category of types of data	Sub-processors
<p>You have access to one of the services stated above for internal use or editorial exploitation according to the basic contract.</p> <p>APA is processor only for the contact details, APA get from you for mailings.</p>	Controller's staff Contact details for mailings	<ul style="list-style-type: none"> <li>- Information on the controller</li> <li>- Information on the data subject</li> <li>- Contact details</li> <li>- Access data</li> <li>- Contents retrieved</li> <li>- Registration information and</li> <li>- Log data</li> <li>- Information on the retrieved article</li> <li>- Search parameters</li> <li>- Search results</li> <li>- Contact details for mailings</li> </ul>	<p>APA-IT Informations-technologie GmbH, Laimgrubengasse 10, 1060 Vienna for technical implementation.</p> <p>Emarsys (emarsys eMarketing Systems AG, Märzstraße 1, 1150 Wien, Österreich) for mailings or Event-Maker (Braintrust GmbH, Dornbacher Straße 59, 1170 Wien, Österreich)</p>

APA-LiveBlog	Category of data subjects	Category of types of data	Sub-processors
<p>You have access to APA-LiveBlog according to the basic contract.</p>	<p>APA processes personal data from employees from you for executing the contract.</p> <p>Tickaroo processes personal data, in order that users from your website can use the APA-LiveBlog.</p>	<ul style="list-style-type: none"> <li>- Information on the data subject</li> <li>- Contact details</li> <li>- Mailadress</li> <li>- Telephone number</li> </ul> <p>IP-adresse, Liveblog-access (data, time, accessed URL), client side random token (Cookie)</p>	<p>APA-IT Informations-technologie GmbH, Laimgrubengasse 10, 1060 Vienna for technical implementation.</p> <p>Tickaroo GmbH, Waffnergasse 8, 93047 Regensburg, Deutschland, for technical implementation</p>



## Products and services of APA-OTS Originaltextservice GmbH

euro adhoc	Category of data subjects	Category of types of data	Sub-processors
You have access to euro adhoc and you use euro adhoc for distributing euro adhoc press releases in compliance with statutory provisions and in accordance with the basic contract.	Persons subject to a notification obligation	<ul style="list-style-type: none"> <li>- Entity</li> <li>- Name</li> <li>- Position</li> <li>- Contact details</li> <li>- Username</li> <li>- Password</li> <li>- Contact for enquiries</li> <li>- Press release number</li> <li>- Type of press release</li> <li>- Title of the press release</li> <li>- Time of initial creation of press release</li> <li>- Time of the press release</li> <li>- Delay for sectoral disclosure</li> <li>- Informed persons</li> </ul>	APA-IT Informations-technologie GmbH, Laimgrubengasse 10, 1060 Vienna for technical implementation.

OTS Manager	Category of data subjects	Category of types of data	Sub-processors
You use the OTS Manager for distributing OTS press releases in accordance with the basic contract.	Releasing person	<p><b>Releasing person's data</b></p> <ul style="list-style-type: none"> <li>- Name</li> <li>- Time of the press release</li> <li>- Title of press release</li> <li>- Code of press release</li> <li>- Type of press release</li> <li>- Logo of the press release</li> <li>- Geodata (place)</li> <li>- Contact for enquiries regarding the press release</li> <li>- OTS content placement of press release</li> <li>- Topic of the press release</li> <li>- Use separate mailing list yes/no</li> <li>- Email recipient</li> <li>- Social media accounts</li> <li>- User writing press release</li> <li>- Releasing person's ID</li> <li>- Customer number</li> <li>- Distribution list of the press release</li> </ul> <p><b>Recipient's data</b></p> <ul style="list-style-type: none"> <li>- Name</li> <li>- Email address</li> <li>- Releasing person's classification</li> </ul>	APA-IT Informations-technologie GmbH, Laimgrubengasse 10, 1060 Vienna for technical implementation.

OTS-Journalist Database	Category of data subjects	Category of types of data	Sub-processors
<p>You use the OTS Journalist Database in accordance with the basic contract.</p> <p>This contract only concerns contact details you uses additionally in your own responsibility within the Journalist Database.</p>	Additional contact details from you	<p><b>Releasing person's data</b></p> <p>Usually</p> <ul style="list-style-type: none"> <li>- Email adress</li> <li>- Name</li> </ul>	APA-IT Informations-technologie GmbH, Laimgrubengasse 10, 1060 Vienna for technical implementation.

MediaContact-Plus	Category of data subjects	Category of types of data	Sub-processors
<p>You use MediaContact-Plus in accordance with the basic contract.</p> <p>This contract only concerns contact details you uses additionally in your own responsibility within the MediaContact-Plus.</p>	Additional contact details from you	<p>Usually</p> <ul style="list-style-type: none"> <li>- Email adress</li> <li>- Name</li> </ul>	<p>Amazon Web Services EMEA SARL</p> <p>38 avenue John F. Kennedy, L-1855 Luxemburg</p> <p>Sitz der Gesellschaft: L-1855 Luxemburg</p> <p>eingetragen im Luxemburgischen Handelsregister unter R.C.S. B186284</p>

## Products and services of APA-DeFacto Datenbank & Contentmanagement GmbH

DeFacto-Host	Category of data subjects	Category of types of data	Sub-processors
Due to the basic contract you have access to DeFacto-Host for retrieving documents from the provided databases.	Controller's staff	<ul style="list-style-type: none"> <li>- Username</li> <li>- Password</li> <li>- Name</li> <li>- Email address</li> <li>- Location</li> <li>- Date and time of registration</li> <li>- Address</li> <li>- Contact details</li> <li>- IP address</li> <li>- Client version</li> <li>- Server version</li> <li>- Authorisations</li> <li>- Authorisation period</li> <li>- Stored search templates</li> <li>- Search terms</li> <li>- Search period</li> <li>- Searched sources</li> <li>- Searched topics</li> <li>- Searched persons</li> <li>- Searched places</li> <li>- Data regarding retrieved search results</li> </ul>	APA-IT Informations-technologie GmbH, Laimgrubengasse 10, 1060 Vienna for technical implementation.

DeFacto press review	Category of data subjects	Category of types of data	Sub-processors
Due to the basic contract you have access to the DeFacto press review	Category of types of data	<ul style="list-style-type: none"> <li>- Username</li> <li>- Password</li> <li>- Name</li> <li>- Email address</li> <li>- Location</li> <li>- Date of last registration</li> <li>- Time of last registration</li> <li>- Contact details</li> <li>- IP address</li> <li>- Item number of authorisation</li> <li>- Item name of authorisation</li> <li>- Authorisation period</li> </ul>	APA-IT Informations-technologie GmbH, Laimgrubengasse 10, 1060 Vienna for technical implementation.

Austria-Kiosk Freelounge	Category of data subjects	Category of types of data	Sub-processors
<p>Due to the basic contract you have a cooperation regarding Austria-Kiosk Freelounge</p> <p>(If you are solely a kiosk partner, a separate ADV according to Art 26 GDPR is necessary.)</p>	Customer and customer's users	<ul style="list-style-type: none"> <li>- Name</li> <li>- ID</li> <li>- Customer classification</li> <li>- IP address for identification</li> <li>- Authorisation</li> <li>- Contents retrieved</li> </ul>	APA-IT Informations-technologie GmbH, Laimgrubengasse 10, 1060 Vienna for technical implementation.

MediaKey for partners	Category of data subjects	Category of types of data	Sub-processors
Due to the basic contract you have a cooperation regarding MediaKey	Customer	<ul style="list-style-type: none"> <li>- Name</li> <li>- email address</li> <li>- postal adressePostadresse</li> <li>- Payment-Accounts (credit card number, CVC-Code, verification number, expiry date, timestamp) reference number</li> <li>- Session-ID</li> <li>- content retrieved</li> </ul>	APA-IT Informations-technologie GmbH, Laimgrubengasse 10, 1060 Vienna for technical implementation.

Web- und Social Media Analytics	Category of data subjects	Category of types of data	Sub-processors
<p>Due to the basic contract you have access to Web- and Social Media Analytics. APA has purchased the license from Talkwalker for you.</p> <p>With regard to the services of Talkwalker APA purely is the agent. In this context APA refers to the DPA of Talkwalker. Talkwalker processes data entered by you in the Talkwalker system. For other data collected by Talkwalker on websites and social media platforms, Talkwalker is responsible itself.</p>	<p>Customer</p> <p>See: <a href="https://www.talkwalker.com/resource/dpa/data-processor-agreement-2018may18-signed.pdf">https://www.talkwalker.com/resource/dpa/data-processor-agreement-2018may18-signed.pdf</a> , attachment 1</p>	<ul style="list-style-type: none"> <li>- Name</li> <li>- Country</li> <li>- email adress</li> </ul> <p>See: <a href="https://www.talkwalker.com/resource/dpa/data-processor-agreement-2018may18-signed.pdf">https://www.talkwalker.com/resource/dpa/data-processor-agreement-2018may18-signed.pdf</a> , attachment 1</p>	<p>APA-IT Informations-technologie GmbH, Laimgrubengasse 10, 1060 Vienna for technical implementation.</p> <p>Talkwalker Sàrl, 12-16 avenue Monterey, 2163 Luxembourg City, Luxembourg as licensor for the tool.</p>

PictureDesk	Category of data subjects	Category of types of data	Sub-processors
<p>Due to the basic contract you have access to the PictureDesk portal for your own research of images and image syndication.</p>	<p>Controller's staff</p>	<ul style="list-style-type: none"> <li>- Information on the controller</li> <li>- Information on the data subject</li> <li>- Contact details</li> <li>- Access data</li> <li>- Contents retrieved</li> <li>- Location</li> <li>- Client information</li> <li>- Registration information and</li> <li>- Log data</li> <li>- Information on the retrieved content</li> <li>- Search parameters</li> <li>- Search results</li> </ul>	<p>APA-IT Informations-technologie GmbH, Laimgrubengasse 10, 1060 Vienna for technical implementation.</p>





# Products and services of APA-IT Informationstechnologie GmbH

In the case of **hosting or outsourcing customers** the category of data subjects and types of data is not known to APA-IT, which is why APA-IT is unable to provide a list. If you as the controller wish to enclose such a list with the DPA, please send the same to our Data Protection Officer at [datenschutzbeauftragte@apa.at](mailto:datenschutzbeauftragte@apa.at).

In the context of **software development** by APA-IT and joint commissioning for operation, personal data may be processed as a processor (Art 28 GDPR). In this relationship, APA-IT is subsequently a processor and may in these cases use the sub-processor AWS to process certain data in the cloud of AWS.

AWS - Amazon Web Services EMEA SARL  
38 avenue John F. Kennedy, L-1855 Luxembourg.  
Registered office of the company: L-1855 Luxembourg  
Registered in the Luxembourg Trade Register under R.C.S. B186284.

A corresponding agreement for a processor relationship with the assurance of compliance with all necessary technical and organizational measures have been concluded. The categories of data subjects and categories of data types are defined according to the contract. Where data is processed outside the EU, AWS has committed to compliance with comparable standards, which are currently the standard contractual clauses.

In customer relationships, personal data may be processed in a processor relationship where the cloud-based solution Office 365 is used.

Microsoft Ireland Operations, Ltd.  
One Microsoft Place, South County Business Park  
Leopardstown, Dublin 18, D18 P521, Ireland.  
Registered office:  
70 Sir Rogerson's Quay, Dublin 2, Ireland.  
Trade register no.: 256796

The following tools are used, among others: Teams, OneDrive, Sharepoint, Exchange Online and Intune.

In these cases, Microsoft is a processor for an APA Group company or a sub-processor of APA-IT in cases where APA-IT is already a sub-processor for another APA Group company. Categories of data subjects and categories of data types may be those processed in connection with the provision of technical support or those processed in connection with the use of the Office 365 systems in the cloud, e.g. documents and other data in electronic form.

A corresponding agreement for a contract processing relationship with the assurance of compliance with all necessary technical and organizational measures (in particular ISO 27001 certification) have been concluded. Data is processed within the EU (Germany, the Netherlands or Ireland), thus on the basis of the DSGVO. Insofar as data is processed outside the EU, Microsoft has undertaken to comply with comparable standards, which are currently the standard contractual clauses. In particular, Microsoft will process data exclusively within the scope of commissioned processing.

Smart Services	Category of data subjects	Category of types of data	Sub-processors
You are purchasing agreed smart services due to the basic contract.	Controller's staff	<ul style="list-style-type: none"><li>- Name, phone number and email address of the controller's stated staff</li><li>- Transmitted text</li><li>- Analysed text</li><li>- Auto-abstract</li></ul>	

Video Services/ Customers of AVP	Category of data subjects	Category of types of data	Sub-processors
<p>You are purchasing agreed video services due to the basic contract.</p>	<p>Controller's staff/users</p>	<p><b>APA-IT</b></p> <ul style="list-style-type: none"> <li>- Name of staff for creation of and access to the video service portal</li> <li>- Email address of staff for creation of and access to the video service portal</li> <li>- Name, phone number and email address of the controller's stated staff</li> </ul> <p><b>JW Player with regard to the use of VideoPlayer</b>            Cookies are standardised deactivated. You can choose using from cookies individually.</p>	<p>JW Player            2 Park Avenue, 10th Floor            New York, NY 10016 (complies with Privacy-Shield USA)</p>



MPS	Category of data subjects	Category of types of data	Sub-processors
<p>You are purchasing MPS due to the basic contract.</p>	<p>Controller's staff/customers</p> <p>Crashlytics: user data of the controller's customer</p> <p>Option Heine: access data of the controller's user who uses the puzzle magazine</p>	<ul style="list-style-type: none"> <li>- Device ID of the controller's customer, IP address and email address and encrypted password in the login process of the controller's customer</li> <li>- Username of the controller's customer</li> <li>- Name, phone number and email address of the controller's stated staff</li> <li>- Retrieval results (what editions were retrieved), IP address, email address of the controller's customer</li> <li>- Crashlytics: builddate, deviceid, clientversion, svnrevision, pdf: issuelid, pdf: pagelid, pdf: currentPageNumber, pdf: currentViewPagerIndex, pdf: lastSelectedIndex, html: issuelid, html:newsItemid, html: currentLevel, html: currentOverviewViewerPosition, html: currentArticleViewerPosition, html: oldPositionOfViewPager, lastevent, articleTitle.</li> <li>- Please note: at the customer's request access to Google Analytics Tracking ID of the customer for use of Google-Analytics on behalf and in the name of the customer. In this case APA-IT is no processor.</li> <li>- Please note: if customers want to use other tracking tools / analytic tools, the relevant data will be processed on behalf of the customer and on the customer's responsibility. To be defined on a case-by-case basis.</li> </ul> <p>Option Heine: IP adress, builddate, accessed website, status code, clientversion</p>	<p>Crashlytics Inc., 1 Kendall Square, Cambridge, MA 02139, USA. Crashlytics helps to track, prioritize, and fix stability issues that erode app quality, in realtime.</p> <p>presse service Stefan Heine, Basselweg 103, D- 22527 Hamburg, optional in case of using puzzle magazine</p>



Email service/IT list server	Category of data subjects	Category of types of data	Sub-processors
Due to the basic contract you are purchasing the email service.	Sending order / recipient	<ul style="list-style-type: none"> <li>- ID</li> <li>- Sending order ID</li> <li>- Email address</li> <li>- Name shown (envelope name)</li> <li>- SM ID</li> <li>- Email content</li> <li>- Email format</li> <li>- Email size</li> <li>- Email subject</li> <li>- Email subject size</li> <li>- Email status</li> <li>- Email sending attempts</li> <li>- Time of preparation of email</li> <li>- Time of last change of the email</li> <li>- Error level of email</li> <li>- Email attachment</li> <li>- Name</li> <li>- Organisation (customer name)</li> <li>- Address</li> <li>- Email address of support service</li> <li>- Preferred type of upload</li> <li>- SMTP server</li> </ul> <p><b>For reporting purposes</b></p> <ul style="list-style-type: none"> <li>- ID</li> <li>- Email address</li> </ul>	

Loop Recorder	Category of data subjects	Category of types of data	Sub-processors
Due to the basic contract you are purchasing Loop Recorder.	Video content	Video content	

