

ALDI SUED Group – Microsoft 365 Privacy Policy

For the US-version please look: [here](#)

For the Australian version please look: [here](#) and [here](#)

For the version for Italian employees please look: [here](#)

For the Hungarian version please look: [here](#)

The protection of your personal data is extremely important to us. The following data protection notice provides you with an initial overview of how your data is processed. Below you will find detailed information sorted by topic.

1. Definition of “Microsoft Office 365 Services”

For ease of reading, this privacy policy uses the term “M365” for all Microsoft 365 Services. It is a collective term for all products from the Microsoft 365 product family.

2. Controller

If you are an employee of the ALDI SUED Group, your employer is controller for data processing.

If you are not an employee of the ALDI SUED Group, the relevant contractual partner of your employer is controller for data processing.

Additional information in the case that the responsible data controller is based in Germany:

Data Protection Officer: Kay-Torsten Schuy, datenschutzbeauftragter@aldi-sued.de.

Please note that persons other than our Data Protection Officer may also read the contents of any e-mail you send to the above e-mail address. If you would like to exchange confidential information, please initially use this e-mail address to request direct contact with the Data Protection Officer.

3. What type of data do we collect?

When you use M365 or the related applications, we process various types of data about you. The specific data that is processed depends, among other things, on which M365 applications you use and what information you enter there.

The following personal data about you may be processed when you use M365:

- Identification data (e.g. name, email address, profile pictures (voluntary), username)
- Content data (e.g. text entered in chats, audio data, video recordings, including, where applicable, particularly sensitive data such as health data, insofar as this arises from audio data, video recordings or text entries)
- Usage data (e.g. information on files and documents accessed, as well as activities such as editing, deleting or changing documents, responses such as likes, chosen settings such as the system language, frequency and duration of use of various M365 apps)
- Access and device data or metadata (e.g. IP address, hardware or device information or data resulting from stored cookies)
- Only if you have voluntarily set up the corresponding functions: biometric data (e.g. fingerprint or retina scan) for authentication
 - Please note: this data is stored exclusively your device, in particular in the context of Windows Hello, so that access by system administrators is not possible without actively involving you.
- Technical data (e.g. cookies when using M365 services in the browser to ensure that content is displayed correctly)
- To prevent data loss, a Cloud Access Security Broker (broker for secure cloud access) is used. Therefore, if particularly sensitive data is entered into M365 services, this data is also processed accordingly

This data may be provided by other software, e.g. access management tools, or yourself, e.g. when you enter data in an excel file or a chat.

4. Purpose and legal basis

As a matter of principle, we only collect and use the personal data of our users if this is required as part of providing functional M365, our content and services, as well as for the appropriate design and improvement of these based on the processing activities and purposes listed below.

4.1 Legal basis

During the use of M365, the controller processes personal data in accordance with the provisions of the European General Data Protection Regulation (GDPR), national data protection laws and other relevant laws.

- Data processing is required to fulfil contractual obligations (only relevant for ALDI employees):

The primary purpose of data processing is to establish, implement and terminate the employment relationship in accordance with Art. 6 para. 1 b) GDPR or the respective legal regulations of the corresponding legal system.

- Data processing is required to fulfil a legal obligation of the controller:

Data processing also takes place in order to fulfil our legal obligations, in particular in the area of tax and social security law, in accordance with Art. 6 para. 1 c) GDPR or the respective legal regulations of the corresponding legal system.

- Data processing is required for the legitimate interests of the controller:

Where required, the controller also processes your personal data on the basis of Art. 6 para. 1 f) GDPR or the respective regulations of the corresponding legal system as the legal basis in order to protect the legitimate interests of the controller or third parties (e.g. other business entities of the ALDI SÜED Group).

4.2 Purpose of processing

The data collected when using M365 will specifically be processed for the following purposes:

- Providing and improving services (e.g. authorisation management, IT support, account management, evaluation of user data and files, in particular for security purposes such as malware detection)
- Facilitating collaboration and communication between employees and with external parties (e.g. e-mails, chats, audio and video calls, shared work on documents, commenting on and liking content, surveys)
- Creating, providing and retrieving information in the form of texts or videos (e.g. SharePoint pages on teams, information on projects and topics)
- Providing information on and organising events and other relevant dates
- Providing a platform for exchange to increase employee satisfaction and collaboration. (e.g. Viva Engage communities on sports, nutrition etc.)
- Evaluating user data to further develop the M365 environment
- Supporting organisation and management (e.g. calendar, tasks and task assignments, providing an organisational chart)
- Providing business relevant software solutions, partly supported by AI features, including: system operation, support, maintenance, and improvement of services and systems including reporting) for example supplier portal
- We also use and/or allow our users to use AI features for backoffice and administrative purposes, e.g. to summarize texts or meetings or to create new texts

4.3 Connected Experiences

- There are different “connected experiences” available for use as part of M365. These are extensions that provide a wide range of functions for different application areas. Some of these services are used to download information from the internet, others serve for data or text analysis. For example, it is possible to automatically translate texts, add subtitles to a video or an ongoing meeting, request automatic suggestions for data visualisation, or practise a presentation and receive AI-based feedback from Microsoft on specific areas for improvement. Microsoft provides a variety of such and other services. Users need to actively select these services in order to use them.

- Within the scope of these connected experiences, different types of data are processed, such as the voice and the way a person speaks, e.g. how a person uses filler words.

In most cases, personal data is only processed within the scope of connected experiences if a user has actively chosen to use one of the functions provided. In individual cases, this may also lead to the further processing of other people's data (e.g. transcriptions for a video in which other people contribute content).

4.4 Bring Your Own Device (BYOD):

If you voluntarily use your own device to access M365 services within the scope of the respective regulations, the following data will additionally be processed in this context:

- Username and identifier
- Information on the operating system used, e.g. iOS or Android, incl. version number
- Information on the compliance status of the device
- Active Directory group membership
- Status information of the user account
- Log data

5 Legitimate interest regarding the use of optional M365 functions

When using M365 services, you can voluntarily provide data at various points. For example, you can upload a profile picture, add private interests to your Delve profile or create an audio or video message.

This is voluntary and there is no obligation to use these functions.

The legal basis for data processing in this case is the controller's legitimate interest in processing the data for the purposes of communication, collaboration and improving the working environment.

You can remove or change the data, for example your profile picture, at any time. If you experience any technical difficulties, please contact the technical support team responsible for M365 services.

Please ensure that uploading a profile image does not infringe any third-party copyrights. Be sure to exclusively upload images that depict you personally. Please also note that uploading racist, pornographic, defamatory, insulting or images of a similar nature is not permitted.

6 Recipient

The Controller receives support from service providers in ensuring the availability of the relevant technical infrastructure, developing its services and carrying out its tasks, and these service providers may have access to your personal data in this context.

In this context, data may also be transferred to external service providers and/or business entities of the ALDI SUED Group outside the European Economic Area (EEA).

Data will only be transferred to companies in third countries which have been confirmed by the EU Commission to provide an adequate level of data protection or to companies that provide other adequate data protection safeguards (e.g. binding corporate data protection regulations or EU standard contractual clauses). Detailed information on this and on the level of data protection that our service providers in third countries provide can be requested from the respective Data Protection Coordinator.

7 Storage period

Your personal data will be deleted once the purpose for which it was stored no longer applies and there are no applicable legal retention periods that prevent it from being deleted.

8 Data subject rights

You can exercise your rights to access, rectification, erasure, restriction of processing and portability of your stored data at any time, provided that the requirements of Art. 15 ff. GDPR or the respective requirements of the corresponding legal system are met. For this purpose, please

contact m365.dataprivacy@aldi-sued.com. If you believe that the processing of your personal data violates legal requirements, you have the right to contact a competent supervisory authority.