

Data Protection Information under Art. 13, 14 GDPR **for Interested Parties, their Employees & other Contact Persons**

1. Introduction

In the context of our cooperation your interest in our products/services or our contact in the interest of your employer, personal data is sometimes exchanged by and with you. With the following information, we would like to give you as a "data subject" an overview of the processing of your personal data by us in the context of our business relationship and your rights under data protection laws.

The processing of personal data, such as your name, address, or information from the contract, is always carried out under the General Data Protection Regulation (GDPR), the Federal Data Protection Act (BDSG), and under the country-specific data protection regulations applicable to our company. Through this data protection declaration, we would like to inform you about the scope and purpose of the personal data we collect, use, and process.

2. Responsible Entity

The Controller as defined by the GDPR is the:

Stadler Metalle GmbH & Co. KG

Unterfeldstr. 4
86842 Türkheim
Telefon: 08245/96799-0
E-Mail: Info@stadler-metalle.de

The legal Representative of the Controller: Mr. Thomas Wenger

3. Data Protection Officer

The Data Protection Office of the Controller can be contacted as follows:

Stefan Auer
ascon-Datenschutz GmbH & Co. KG
Telefon: 0911 / 148986-50
Telefax: 0911 / 148986-59
E-Mail: office@ascon-datenschutz.de

Feel free to contact our Data Protection Officer directly at any time with any questions or suggestions regarding data protection.



4. Processing Activities and Purposes

The [company] stores and processes your personal data as part of the following processing activities:

- **Responding to Inquiries**

Purpose of processing: Responding to inquiries from interested parties and customers as part of the initiation and/or execution of contractual relationships

- **Customer Data Management (CRM)**

Processing purpose: Maintaining and managing the master data of customers, interested parties, and partners, including task management

- **Credit Assessment**

Purpose of processing: Carrying out credit checks with credit agencies before concluding contracts in order to ensure the solvency of the potential contractual partner.

- **Data Privacy Documentation**

Purpose of processing: Ensuring compliance with documentation and verification obligations under the EU General Data Protection Regulation

- **Email Archiving in accordance with GoBD**

Processing purpose: GOBD-compliant archiving of emails (principles for the proper management and storage of books, records, and documents in electronic form and for data access "GoBD")

- **Guest-WiFi**

Processing purpose: Logging of data categories via the Guest WiFi (e.g. websites in the content filter of the firewall) and MAC addresses of the end devices (DHCP server)

- **Use of Groupware Systems (e-mail, calendar, contacts, etc.)**

Purpose of processing: Use of groupware software and associated processing of personal data in emails, calendars, contact books, task planning tools, and instant messengers to maintain business operations and handle internal and external communication as required

- **Execution of Competitions**

Purpose of processing: organizing competitions to increase the attractiveness of certain services/products to acquire new customers or maintain relationships with existing customers

- **Sending Newsletters and Advertising Material**

Purpose of processing: Sending newsletters and personalized advertising letters to promote products/services and acquire new customers

- **Conducting Video Conferences**

Processing purpose: Conducting audio-video meetings as part of the contract initiation process to present services/products or coordinate with interested parties

- **IT Operation: Telephone System**

Purpose of processing: Personal data is collected and processed as part of the use and provision of the telephone system. The telephone system is an (IP telephone system / conventional telephone system).

Your data will only be processed for purposes other than those mentioned if this processing is necessary to achieve the purpose. We will inform you about this processing before further processing of your data and, if necessary, obtain your consent.

5. Legal Grounds for Data Processing

- *Art. 6 para. 1 subpara. 1 letter b) GDPR* for the implementation of pre-contractual measures
- *Art. 6 para. 1 subpara. 1 letter c) GDPR* to fulfill the legal obligations to which we are subject as a company. These include:
 - ✓ Archiving Emails under GoBD
 - ✓ Destruction of data carriers in accordance with Art. 5 para. no. and Art. 17 GDPR
 - ✓ Privacy Documentation (Art. 5 para. 2 GDPR)
- *Art. 6 para. 1 subpara. 1 letter f) GDPR*, insofar as data processing is necessary to protect our legitimate interests or those of a third party. This includes the following processing activities:
 - ✓ Maintenance of Data in the CRM System
 - ✓ Distribution of Promotional Mailings including Christmas Cards & Gifts
 - ✓ The Distribution of Newsletters within the scope of Section 7 (3) UWG
 - ✓ Credit Checks
 - ✓ Guest-WiFi
 - ✓ Use of Group Software Systems
- *Art. 6 para. 1 subpara. 1 letter a) GDPR*, insofar as you have given us your consent to process your personal data for specific purposes. This includes the following processing activities:
 - ✓ Sending Newsletters outside the existing customer privilege under Section 7 (3) UWG
 - ✓ The Execution of Competitions

6. Type of Personal Data Being Processed

The type of personal data we process from you depends on the respective processing purpose. Typically, the following types of data may be affected:

- *Personal Master Data* (name, address, gender)
- *Contact Details* (telephone, e-mail address, postal address)
- *Creditworthiness Data* (credit scores, payment history)
- *Qualification and Professional Information* (professional activity, certifications, degrees, and certifications obtained)
- *Contract Data* (Information on desired Products/Advisory Services and details on Payment and Processing)
- *Image and Video Data* (Text, Audio, and Video Data: Data from the Microphone and, if applicable, the Video Camera of the end device during the duration of the web meeting to play the audio or display the video; if applicable, Text Entries when using the Chat Function)
- *Meeting Metadata* (Participant IP Addresses, Device/Hardware Information)
- *Connection Data* (Information on the incoming/outgoing Phone Number, Country, start and end time, and other Connection Data if applicable (e.g. IP Address of the Device))
- *Business Contact and Communication Data including log and history information*

In some cases, further data may also be affected in the context of contract initiation. Which data this is depends on the communication between you and the responsible parties at the controller.



7. Daten Origin of your Personal Data

The majority of the personal data processed was collected directly from you as the data subject, for example in the context of communication, via submitted forms, etc. In some cases, the data is also passed on to us by your employer or business partner (e.g. to establish contact).

Other Sources provide the following Categories of Data:

- **Creditworthiness Data**

Data Source: Provided by credit agencies following a credit check by the controller

8. Recipients and Authorized Parties

Your Personal Data has been disclosed to the following recipients where necessary:

- **Internal Employees & Departments**, insofar as they require the data to fulfill the respective processing purpose
- **Professional Secrecy Holders, Financial Service Providers & Authorities** (e.g. Tax Consultants, Auditors, Banks, Credit Institutions, Tax Authorities, Credit Agencies)
- **Contract Processors** (e.g. data centers, IT service providers, waste disposal companies, etc.) whose services we use exclusively

Data will only be transferred to third countries (countries outside the European Economic Area - EEA) if this is necessary for the execution of the contract (e.g. payment orders) if you have given us your consent, or if this is otherwise permitted by law. In this case, we take measures to ensure the protection of your data, for example through contractual regulations. We only transfer data to recipients who ensure the protection of your data under the provisions of the GDPR for the transfer to third countries (Art. 44 to 49 GDPR).

9. Retention Duration of your Personal Data

Your Personal Data will be stored for as long as necessary to fulfill the respective processing purpose. The following deletion periods have been defined:

- For all Data relevant under *Tax and Commercial Law*, 10 years plus a waiting period of a further 2 years to cover cases of possible suspension of expiry. After 12 years, we check whether there are reasons for further storage.
- For *Offer and Contract Documents*, etc. 3 years after the end of the contractual relationship, if the statutory period for asserting claims has expired.
- For Data Processing based on *Consent or Legitimate Business Interest* until the withdrawal of consent or objection to processing or the end of the business relationship at the latest. If, in the case of processes requiring consent, processing is intended that goes beyond the business relationship, this can be found in the data protection information as part of the declaration of consent.

The storage period may be extended if the data is required for pending legal proceedings or if the legal requirements change (e.g. extension of retention obligations). In this case, the data will be stored until the legally binding conclusion of the proceedings or under the new legal requirements.

10. Obligation to Provide Personal Data

In principle, you are not obligated to provide any data, but neither communication nor the conclusion of a contract is possible without the provision of certain data. As an employee, you may be obligated to provide the data to your employer on the basis of your employment contract. Failure to provide the data will make it impossible for you to perform your duties and may constitute a breach of your employment duties by your employer.

11. Automated Decision-Making/Profiling

Automated Decision-Making or Profiling does not take place.

12. Your Legal Rights as a Data Subject

Right to Confirmation Art. 15 GDPR

You have the right to obtain confirmation from us as to whether or not personal data concerning you is being processed.

Right to Information Art. 15 GDPR

You have the right to receive free information from us at any time about the personal data stored about you and a copy of this data.

Right to Rectification Art. 16 GDPR

You have the right to request the rectification of inaccurate personal data concerning you. Furthermore, the data subject has the right to request the completion of incomplete personal data, taking into account the purposes of the processing.

Right to Deletion Art. 17 GDPR

You have the right to demand that we erase the personal data concerning you without undue delay, provided that one of the reasons provided by law applies and insofar as the processing is not necessary.

Data Transferability Art. 20 GDPR

You have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used, and machine-readable format. You also have the right to transmit this data to another controller without hindrance from us to whom the personal data has been provided, provided that the processing is based on consent under Art. 6 para. 1 lit. a GDPR or Art. 9 para. 2 lit. a GDPR or on a contract under Art. 6 para. 1 lit. b GDPR and the processing is carried out by automated means, unless the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.

Furthermore, in exercising your right to data portability under Art. 20 (1) GDPR, you have the right to have personal data transmitted directly from one controller to another, where technically feasible and provided that this does not adversely affect the rights and freedoms of others.



Objection, Art. 21 GDPR

At any time, you have the right to object to the processing of personal data concerning you, on grounds relating to your particular situation. This is based on point (f) of Article 6(1) GDPR (data processing based on a balancing of interests).

If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms, or the processing serves the establishment, and exercises or defends legal claims.

Withdrawal of Consent under Data Protection Law

If we process your personal data because you have given us your consent to do so, you may withdraw your consent to the processing of the personal data concerned at any time with effect for the future. Withdrawal will not result in any disadvantages for you in the context of the employment relationship and the corresponding data processing will be stopped accordingly. You will find detailed information on this in the respective consent.

Complaints to Regulatory Authorities

You have the right to complain to the regulatory authority responsible for data protection about our processing of personal data. The contact details of the supervisory authority responsible for us are:

Bayerisches Landesamt für Datenschutzaufsicht

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91522 Ansbach
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E-Mail: poststelle@lda.bayern.de