



Data Protection Information According to Art. 13, 14 GDPR for Customers, Suppliers, Business Partners & Their Employees

1. Introduction

Within the scope of our business relationship or our contact in the interest of your employer, personal data is sometimes exchanged between us. Based on the following information, our aim is to provide you as the "data subject" with an overview of the processing of your private data by us as part of our business relationship and your rights under data protection legislation.

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

2. Controller

Responsible in terms of the GDPR is the:

Stadler Metalle GmbH & Co. KG

Unterfeldstr. 4

86842 Türkheim

Telefon: 08245/96799-0

E-Mail: Info@stadler-metalle.de

An Authorized Representative of the Controller: Mr. Thomas Wenger

3. The Data Protection Officer

The Data Protection Officer of the Controller is to 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

Should any questions or suggestions arise regarding data protection, you can contact our Data Protection Officer directly at any time.



4. Processing Activities and Purposes

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

- **Invoicing and the dunning process in cooperation with the Tax Consultant**

Purpose of Processing: Accounting in the division of labor with the tax consultant including bookkeeping, VAT, balance sheet, and payment monitoring including reminders, monitoring of deadlines, and payment targets.

- **Responding to Queries**

Purpose of Processing: Responding to inquiries from customers and business partners as part of the initiation and/or execution of contractual relationships

- **Customer Relationship Management (CRM)**

Processing Purpose: Maintenance and administration of client, prospect, and partner master data including task management.

- **Credit Assessment**

Processing Purpose: Carrying out credit checks with credit agencies before concluding contracts to ensure the creditworthiness of the potential contractual partner

- **Ticket System for Processing Support Requests**

Purpose of Processing: Ticket system for processing support requests and internal inquiries, including securing personal and company-related data; documentation of services to customers as proof (history); use of data in the context of invoicing customers (obligation to retain documents relevant to accounting listed under Section 257 (1) No. 1, 4 HGB)

- **Merchandise Management**

Purpose of processing: Personal data is collected and processed as part of the use of the merchandise management system/ERP system. This is necessary for the control and implementation of internal operating processes. These include customer management, goods management and warehouse control, order control, procurement workflow, and the creation of commercial documents for invoicing.

- **Data Protection Documentation**

Processing purpose: Ensuring compliance with documentation and verification obligations under the EU General Data Protection Regulation

- **Email-Archiving in Compliance 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 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 (email, 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 in line with requirements.

- **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 Communications**

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 business relationship.

- **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).

Any processing of your data for purposes other than those mentioned will only take place if this processing is necessary to achieve the purpose, for pending legal proceedings, or due to a change in legal requirements. We will inform you about any such processing before processing your data and, if necessary, obtain your consent.

5. Legal Grounds for Processing

- *Art. 6 para. 1 subpara. 1 letter b) GDPR for the fulfillment of the concluded contracts*
- *Art. 6 para. 1 subpara. 1 letter c) GDPR for the fulfillment of legal obligations to which we are subject as a company.* These include:
 - ✓ Archiving Emails in accordance with GoBD
 - ✓ Destruction of data carriers in accordance with Art. 5 para. no. and Art. 17 GDPR
 - ✓ Privacy Documentation (Art. 5 Abs. 2 DS-GVO)
 - ✓ Accounting in accordance with HGB, GoBD und Tax Laws
- *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:
 - ✓ Processing of Business Contracts
 - ✓ Assertion of and Defense against Legal Claims
 - ✓ Maintenance of data in the CRM-System
 - ✓ Merchandise Management



- ✓ Distribution of promotional mailings including Christmas Cards & Gifts
- ✓ Distribution of Newsletters within the scope of § Section 7 (3) UWG
- ✓ Credit Assessment
- ✓ Guest WiFi
- ✓ Use of Corporate Groupware Systems
- *Art. 6 para. 1 subpara. 1 letter a) GDPR*, insofar as you have given us your consent to process the personal data concerning you for specific purposes. This includes the following processing activities:
 - ✓ Sending newsletters beyond the existing customer privilege as defined in § Section 7 (3) UWG
 - ✓ Conducting Contests

6. Type of Personal Data which is Processed

The personal data about you that is processed by us depends on the respective processing purpose. Typically, the following types of data may be affected:

- *Personal Master Data* (name, address, gender)
- *Contact Data* (telephone, e-mail address, postal address)
- *Creditworthiness Data* (scoring values, payment history)
- *Qualification and Professional Information* (professional activity, certifications, degrees, and certifications obtained)
- *Contract Data* (information on ordered products/booked consulting services as well as details on payment and processing, bank details)
- *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 historical information*

If applicable, additional data may also be affected as part of the contract initiation process. Which data this is depends on the communication between you and the responsible parties at the relevant office.

7. Data Source

Most of the processed personal data was collected directly from you as the data subject, for example as part of the conclusion of the contract, through communications to the controller, via submitted forms, etc.

The following categories of data originate from a different source:

- **Creditworthiness Data**

Data Source: Provision by credit agencies following a credit check by the financial 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, and credit agencies)
- **Processors** (e.g. data centers, IT service providers, waste disposal companies, etc.) whose services we only use

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 Period 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 *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, the processing is intended to continue beyond the end of the business relationship, this can be found in the data protection information in 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 in accordance with the new legal requirements.

10. Obligation to Provide Personal Data

In principle, you are not obliged to provide the data, but it is not possible to conclude a contract without providing certain data.

11. Automated Decision-Making/Profiling

Automated decision-making or profiling does not take place.

12. Your Rights as a Data Subject

Right to Confirmation Art. 15 GDPR

You have the right to request confirmation from us as to whether personal data concerning you is being processed.

Right to Information Art. 15 GDPR

You have the right to receive information from us at any time free of charge 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 Transmittal 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 your 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

You have the right to object, on grounds relating to your particular situation, at any time of the processing of personal data concerning you which 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, exercise, or defense of legal claims.

Revocation 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 a Regulatory Authority

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 regulatory authority responsible for us are:

Bayerisches Landesamt für Datenschutzaufsicht

Promenade 18
91522 Ansbach
Tel.: 0981/180093-0
E-Mail: poststelle@lda.bayern.de