

Principles of data processing

We are glad that you want to obtain information on data processing. We regularly process the personal data of contact persons and employees of customers electronically for the purpose of collaborative work. To meet our information requirements under Art. 12, 13 of the General Data Protection Regulation (GDPR) we would like to present our information on data protection in the following:

Who is responsible for processing data?

Within the meaning of the data protection law, the responsibility lies with

STENFLEX® Rudolf Stender GmbH

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You will find further information about our company, authorised representatives and other contact options in the masthead of our webpage: <https://www.stenflex.com/impressum.html>

Which data do we process? And for what purposes?

If we receive data from you, then in principle, we process it only for the purposes for which we have received or collected it.

Usually, these purposes are:

- **Communication for contract fulfilment**
- **Sending information about new features and changes to the product range**
- **References for new customers**
- **Shipment of goods ordered by you**
- **Invoicing and direct debits**
- **Safeguarding of guarantee claims**

This data usually consists of:

- **Your master data (e.g. family name, first name, title, salutation)**
- **Contact data (e.g. Email address, telephone number, mobile number)**
- **Data regarding transactions (e.g., IBAN, BIC, credit standing)**
- **Data related to contracts (e.g. contact persons, authorised representatives, managing directors)**

and other personal data that you share with us. Please note that we cannot mention all potential data. But we only collect the data which you actively provide to us, or which is publicly available.

Data processing for other purposes is considered only when there are necessary legal provisions under Art. 6 Para 4 of the GDPR insofar. In this case, we shall, of course, comply

with any information obligations in accordance with Art. 13 Para 3 of the GDPR and Art 14 Para 4 of the GDPR.

What is the legal basis for this?

The legal basis for the processing of personal data is, in principle– insofar as there are no further detailed legal provisions – Art. 6 of the GDPR. The following possibilities are especially considered here:

- Consent (Art. 6 Para. 1 Lit. a) GDPR)
- Data processing for the fulfilment of contracts (Art. 6 Para. 1 Lit. b) GDPR)
- Data processing on the basis of a balancing of interests (Art. 6 Para. 1 Lit. f) GDPR)
- Data processing for the fulfilment of a legal obligation (Art. 6 Para. 1 Lit. c) GDPR)

When personal data is processed on the basis of your consent, you have the right to revoke the consent at any time with effect for the future.

We establish our legitimate interest in the opportunities of direct advertising § 7 Para. 3 of the Law against Unfair Competition (UWG) as per 47 of the GDPR; we have a legitimate interest in informing our customers about our goods and services through communication channels. As data subject, you have the right to object to the processing of personal data for these purposes in consideration of the provisions of Art. 21 GDPR.

How long is the data stored?

We process data as long as this is necessary for the respective purpose.

Insofar as legal retention obligations exist – e.g. with respect to commercial law or tax law – the related personal data is stored for the duration of the retention obligation. After the expiry of the retention obligation, it is checked whether there is a further need for processing. If there is no such need, the data is deleted.

Basically, we do a verification of data with respect to the necessity for further processing at the end of a calendar year. Due to the volume of the data, this verification takes place with respect to specific data types or purposes of processing.

Of course, you can request information about your personal data saved with us any time (see below) and if the retention of the data is not necessary, you can us to delete the data or restrict the processing.

To which recipients is the data passed on?

In principle, a transfer of your personal data to a third party takes place only when this is necessary for the execution of the contract with you, the transfer on the basis of a balancing of interests in terms of Art. 6 Para 1 Lit. f) GDPR is only permitted when we are legally liable for the transfer or you have given your consent insofar.

This can be, for example, companies and transport as well as logistics providers linked to us in the course of deliveries.

In our case, third parties are not service providers and affiliated companies which must comply with our data protection requirements. We have therefore concluded contract processing agreements, thus ensuring that you may also exercise your rights against them.

Where is the data processed?

We process your personal data only in data centres in the European Union, and therefore the General Data Protection Regulation always applies to the processing.

Your rights as the "data subject"

You have the right to information on your personal data processed by us in accordance with Art. 15 of the GDPR. In case of a request for information which is not made in writing, we request you to understand that we may then ask you to prove that you are the person who you claim to be.

Furthermore, you have a right to rectify or delete or restrict the processing, insofar as you are entitled to do so by law in accordance with Art. 16, 17 and 18 of the GDPR.

Furthermore, you have a right to object to the processing within the framework of the legal requirements. The same applies to the right to data transferability. In particular, under Art. 21 Para 1 and 2 of the GDPR, you have the right to object to the processing of your data in the framework of Art 6 Para 1 Lit. f of the GDPR. You may report the objection informally to our data protection officer at the following addresses:

Our data protection officer

We have designated an external data protection officer in our company. You can contact the officer at:

FKC Management-System-Beratung GmbH
Eschenburgstr. 5
23568 Lübeck
Email: datenschutz@stenflex.de

Right to lodge a complaint

You have the right to lodge a complaint about the processing of personal data by us to a supervisory authority for data protection.