

## **Data Privacy Notice**

1. The processing of personal data by Bernhard Ide GmbH & Co. KG ("IDE") is carried out in accordance with applicable data privacy legislation, in particular the General Data Protection Regulation (GDPR) and the Federal Data Protection Act (BDSG) for the purposes listed below. The controller for the data processing pursuant to Article 4(7) GDPR is Bernhard Ide GmbH & Co. Kg, Liebigstr. 16, 73760 Ostfildern, Germany, Tel: +49 (0)7158 179-0; Fax: +49 (0)7158 63756; ide@ide-extrusion.de.
2. The operations data protection officer at IDE, Mr. Christian Schwinge, can be contacted at Heilbronner Str. 86, 70191 Stuttgart, Telephone: +49 (0) 711 2585600, e-mail: christian.schwinge@schwinge.com.
3. IDE processes personal data that IDE receives within the scope of its business relationship from the contractual partner and/or – insofar as the contractual partner is a company – from the contractual partner's employees. Moreover IDE processes personal data that IDE has legitimately obtained from publicly accessible sources (e.g. the Commercial Register, the press, the Internet) and is allowed to process. The data processed by IDE includes customer or personal data from a contractual partner and – if the contractual partner is a company – from the contractual partner's employees (e.g. name, address, e-mail address, telephone and other contact data), payment data, data on goods ordered and advertising and sales data.
4. The personal data are processed by IDE insofar as this is necessary for the preparation and execution of contracts, in particular the handling of orders, the delivery of goods, the settlement of payments, the avoidance of bad debts and customer relationship management. This processing is thus carried out for the purpose of fulfilling the contractual obligations on the basis of Article 6(1)(b) GDPR. The processing of personal data is further carried out pursuant to Article 6(1)(c) GDPR insofar as this is necessary for compliance with a legal obligation, in particular for ensuring the completeness and correctness of tax data in accordance with the German Fiscal Code (AO). Failure to provide the necessary data may mean that a contract cannot be concluded.
5. Moreover, IDE processes personal data for the purposes of IDE's legitimate interests on the basis of Article 6(1)(f) GDPR. These include, for example, processing for advertising, market research and public opinion research (unless the processing has been objected to), processing for the needs-based design of offers and direct customer approach, processing for asserting and defending legal claims and legal disputes, as well as for business management measures and for the further development of products.
6. IDE forwards data from the contractual partner to service providers, order processors and auxiliary persons, which it makes use of for the execution of the business relationship. This includes forwarding the data required for delivery to the logistics providers commissioned, to the manufacturer of the goods or to the technical service provider insofar as they are commissioned to deliver to the contractual partner.

IDE reserves the right to also transmit the contractual partner's personal data (for example, the company, name, address, payment data) to the credit agency Creditreform Stuttgart Strahler KG for the purpose of performing a credit check. This may take place upon conclusion of the contract, prior to an extension of the contract, in the case of an amendment to the contract, as well as upon becoming aware of any circumstances affecting creditworthiness, if applicable. IDE reserves the right to appoint another credit agency in place of the credit agency specified above. If there is negative information on creditworthiness characteristics, IDE may refuse to enter into a contractual relationship with the contractual partner. IDE receives information from the credit agencies on the contractual partner's former payment behavior and credit worthiness information on the basis of mathematical-statistical methods that also makes use of the address data. The collection, storage and forwarding therefore take place for the purposes of a credit check to avoid a payment default and on the basis of Article 6(1)(b) GDPR and of Article 6(1)(f) GDPR.

IDE further reserves the right to also transmit personal data to service providers in the area of credit insurance, debt collection and marketing. The service providers and order processors will be required by IDE under the strict provisions of the GDPR to comply with data protection and confidentiality and may not make further use of the data for any other purpose.

7. IDE will store the personal data as long as it is necessary for the business relationship, in particular for the preparation and execution of contracts and for compliance with legal obligations. The legal obligations include in particular the statutory periods of safekeeping in accordance with the German Commercial Code (HGB) and the Fiscal Code. The latter specify periods of safekeeping of six to ten years. Furthermore, statutory periods of limitations also affect the period of storage. According to sections 195 et seqq. of the German Civil Code (BGB) the regular statute of limitations is three years, in certain cases the statute of limitations may also be thirty years.
8. No personal data is transmitted to any country outside the European Union or to any international organization.
9. Any data subject has the right to information from IDE in accordance with Article 15 GDPR, the right to rectification in accordance with Article 16 GDPR, the right to erasure in accordance with Article 17 GDPR, the right to restriction of processing in accordance with Article 18 GDPR, the right to object in accordance with Article 21 GDPR as well as the right to data portability in accordance with Article 20 GDPR. The restrictions in accordance with sections 34 and 35 BDSG apply to the right of information and the right to erasure. In addition, under Article 77 GDPR in conjunction with section 19 BDSG the data subject has the right to lodge a complaint with the competent data protection regulatory authority for IDE, in this case with the State Landesbeauftragter für den Datenschutz und die Informationsfreiheit Baden-Württemberg (State Privacy Commissioner), Königstrasse 10a, 70173 Stuttgart, e-mail: bsdb@fdi.bwl.de. Consent granted pursuant to Article 6(1)(a) GDPR may be withdrawn vis-à-vis IDE at any time. By withdrawing consent the lawfulness of the processing carried out until the consent is withdrawn remains unaffected.

- 10. In accordance with Article 21(1) GDPR a data subject may object to the data processing that is carried out based on Article 6(1)(f) GDPR (data processing on the basis of a balance of interests) at any time on grounds relating to the particular situation of the data subject. If the data subject objects, IDE will no longer process the data subject's personal data unless IDE demonstrates compelling legitimate grounds for the processing that override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of a legal claim.**
  
- 11. A data subject may object to the use of the data subject's data for the purposes of direct marketing at any time with future effect; this also applies to profiling to the extent that it is related to such direct marketing. If a complaint is lodged, IDE will refrain from any further processing of the data subject's personal data for the purposes of direct marketing.**
  
12. An objection under para. 10 and para. 11 may be made without any requirement of form and must be addressed to the data protection officer (see para. 2).