

Privacy Notice for Customers and Interested Parties

according to Art. 13, 14, and 21 of the GDPR

We take data protection very seriously. Below, we explain the ways in which we process your data and what your rights are.

1 Who is responsible for data processing and whom can you contact?

vhf camufacture AG
Lettenstraße 10
72119 Ammerbuch/Germany
+49 7032 97097 000
info@vhf.de

2 Contact details of the data protection officer

data-protection@vhf.de

3 Processing purposes and legal basis

Your personal data will be processed in accordance with the provisions of the General Data Protection Regulation (GDPR), the Federal Data Protection Act (*Bundesdatenschutzgesetz, BDSG*) and other relevant data protection regulations. The processing and use of individual data depends on the agreed or requested service. Further details and supplements concerning the processing purposes can be found in our contract documents, forms, declarations of consent and in other information that is provided to you (e.g. on the website or in the terms and conditions of business).

3.1 Consent (Art. 6(1)(a) of the GDPR)

If you have given us your consent to process personal data, the respective consent forms the legal basis for the type of processing specified there. Declarations of consent can be withdrawn at any time with future effect.

3.2 Performance of contractual obligations (Art. 6(1)(b) of the GDPR)

We process your personal data for the purposes of performing our contracts with you including, in particular, in connection with our order processing and service use. In addition, your personal data will be processed in order to implement actions and tasks in the course of pre-contractual relationships.

3.3 Compliance with legal obligations (Art. 6(1)(c) of the GDPR)

We will process your personal data where this is necessary in order to comply with legal obligations (e.g. commercial law or tax law). We will also process your data, where necessary, to carry out identity checks, to check European and international anti-terror lists, to comply with monitoring and reporting obligations specified under tax law, as well as to archive data for the purposes of data protection and data security and for audits by tax and other authorities. It may also be necessary to disclose personal data in connection with official/court measures for the purposes of collecting evidence, conducting criminal prosecutions or enforcing civil claims.

3.4 Legitimate interests pursued by us or third parties (Art. 6(1)(f) GDPR)

We may also use your personal data on the basis of an interest assessment to safeguard legitimate interests pursued by us or third parties. This will be done for the following purposes:

- To carry out advertising or market research, provided that you have not objected to the use of your data.
- To obtain information and exchange data with credit agencies, where this goes beyond our economic risk.
- To store your data in limited form if, owing to the specific means of storage, deletion is not possible or would be possible only by incurring unreasonably high costs.
- To check against European and international anti-terror lists, where this goes beyond the statutory obligations.
- To enrich our data through using or researching publicly accessible data.
- To enforce legal claims and conduct defense in the event of legal disputes that cannot be directly attributed to the contractual relationship.

4 The categories of personal data that we process

The following data are processed:

- Personal data (name, nationality, profession/industry and similar data)
- Contact details (address, email address, telephone number and similar data)
- Payment/cover confirmation for bank cards and debit cards
- Information concerning your financial situation (creditworthiness data, i.e. data for assessing your economic risk)
- Customer history

We also process personal data from public sources (e.g. internet, media, press, trade and associations register, register of residents, lists of debtors, land registries). If necessary for the purposes of providing our service, we will process personal data that we have obtained lawfully from third parties (e.g. address publishers, credit agencies).

5 Who will receive your data?

We will pass on your personal data within our company to the departments that require the data to comply with the contractual and statutory obligations or to pursue our legitimate interest. In addition, the following agencies may receive your data:

- Processors appointed by us (Art. 28 GDPR)
- Public bodies and institutions where there is a statutory or official obligation and
- other agencies for which you have given us your consent to transfer your data to them.

6 Transmission of your data to a third country or an international organization

Your data will not be processed outside the EU or the EEA.

7 For how long do we store your data?

To the extent necessary, we will process your personal data for the duration of our business relationship, which also includes the formation and processing of a contract. We are also subject to various retention and documentation obligations stipulated, inter alia, in the German Commercial Code (*Handelsgesetzbuch, HGB*) and the German Tax Code (*Abgabenordnung (AO)*). The retention and documentation periods specified therein last for up to ten years beyond the end of the business relationship or, as the case may be, the pre-contractual legal relationship. Ultimately, the retention period also depends on the statutory limitation periods; for example, according to sections 195 et seq. of the German Civil Code (*Bürgerliches Gesetzbuch, BGB*), these usually run for three years but in certain cases may also run for up to thirty years.

8 To what extent will automated individual decision-making (including profiling) take place?

We will not use any purely automated decision-making process according to article 22 of the GDPR. If we carry out such processes in individual cases, we will inform you of this separately, if this is required by law.

9 Your data protection rights

You have a right of access under Art. 15 of the GDPR, a right to rectification under Art. 16 of the GDPR, a right to erasure under Art. 17 of the GDPR, a right to restriction of processing under Art. 18 of the GDPR and a right to data portability under Art. 20 of the GDPR. There is also a right to lodge a complaint with a data protection supervisory authority (Art. 77 of the GDPR). Under article 21 of the GDPR, there is, in principle, a right to object to the processing of personal data by us. However, this right to object is available only in very specific circumstances concerning your personal situation and, in this respect, the rights of our company may in some cases impede your right to object. If you wish to assert these rights, please contact our data protection officer (data-protection@vhf.de).

10 The extent of your obligations to provide us with your data

You need only provide us with such data as are necessary for the establishment and implementation of a business relationship or pre-contractual relationship with us, or which we are required to collect by law. Without this data we will usually not be in a position to conclude or perform the contract. This may also relate to data that is required subsequently in connection with the business relationship. If we ask you for other data you will be specifically informed that providing the information is voluntary.

11 Information concerning your right to object under Art. 21 of the GDPR

You have the right at all times to lodge an objection to the processing of your data under Art. 6(1)(f) of the GDPR (data processing on the basis of a balancing of interests) or Art. 6(1)(e) of the GDPR (data processing in the public interest) if there are reasons for doing so that are based on your specific situation. The same applies to profiling, within the meaning of Art. 4(4) of the GDPR, that is based on this provision. If you lodge an objection, we will no longer process your personal data, unless we can demonstrate compelling legitimate reasons for such processing, which outweigh your interests, rights and freedoms, or if such processing assists in the enforcement, exercise or defense of legal claims. Where applicable, we will also process your personal data to engage in direct advertising.

If you do not wish to receive such advertising you shall, at all times, have the right to object to this. The same applies to profiling to the extent that this is linked to such direct advertising. We will respect this objection with future effect. We will no longer process your data for the purposes of direct advertising if you object to them being processed for such purposes. An objection can be lodged, in any form, at the address indicated in item 1.

12 Your right to lodge a complaint with the competent supervisory authority

You have a right to lodge a complaint with a data protection supervisory authority (Art. 77 of the GDPR). The competent supervisory authority for us is:

The State Commissioner for Data Protection and Freedom of Information
(Der Landesbeauftragte für den Datenschutz und die Informationsfreiheit)
Königstraße 10 a
70173 Stuttgart

Revision 001 – As of:16.04.2018