



Privacy policy for business partners and their contact persons

With this data protection notice, EWM GmbH, Dr.Günter-Henle-Str. 8, 56271, Mündersbach, as well as all other companies of the EWM Group (an overview of the individual companies can be found at <https://www.ewm-group.com/en/contact/branches.html> ("Europe") (hereinafter also referred to collectively as the "EWM Group")) have fulfilled their legal obligation to provide information in accordance with Article 13 of the General Data Protection Regulation ("GDPR") with regard to the processing of personal data of interested parties and other business partners. In the following, we therefore explain to you based on our data protection notice which personal data we process from you and in what way. Please contact us if you have any further questions.

Responsible

EWM GmbH

Contact details of the responsible person:

Dr. Günter-Henle-Str. 8, 56271, Mündersbach

Phone: +49 2680 181 - 0

Fax: +49 2680 181 - 244

Electronic contact address of the responsible person: info@ewm-group.com

Registry court: Montabaur Local Court

Register number: Commercial register number HRB 23726

Contact details of the data protection officer:

Mr Jan Morgenstern

MORGENSTERN consecom GmbH

Große Himmelsgasse 1

67346 Speyer

E-mail: datenschutz@ewm-group.com

Tel.: 06232-100 119 44

Mail datenschutz@ewm-group.com

Personal Data

Personal data means any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person. This includes, for example, information such as your name, address, telephone number, e-mail address and bank details.

Purpose of the processing of personal data, legal basis

A processing of personal data is any operation or set of operations which is performed upon personal data, whether by automatic means. Data processing is the collection, recording, organisation, classification, storage, adaptation, modification, reading out, querying, use, disclosure by transmission, dissemination or any other form of provision, comparison or linking, restriction, erasure, or destruction of personal data.

We process personal data in accordance with the specifications and requirements set out below within the framework of automated processing, generally based on a relevant legal basis. We process your data for the performance of contracts or for pre-contractual purposes such as contract initiation. If we rely on a statutory legal basis, this is usually Art. 6 (1) sentence 1 lit. b GDPR ("necessity with regard to the performance of the contract").

We process the following data:

Interested parties and other business partners:

- Personal/contact data (e.g., first name, last name, company if applicable, address, mobile/telephone number, fax, e-mail)
- Communication data in connection with correspondence (e-mails, correspondence)

Customers:

- Personal/contact data (e.g., first name, last name, company if applicable, mobile/telephone number, fax, e-mail, address)



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- Contract and billing data (e.g., bank details, goods ordered, invoice data)
- Communication data in connection with correspondence (e-mails, correspondence)
- Credit checks

Suppliers and service providers:

- Personal/contact data (e.g., first name, last name, company, mobile/telephone number, fax, e-mail, address)
- Contract and billing data (e.g., bank details, goods ordered, invoice data)
- Communication data in connection with correspondence (e-mails, correspondence)

Regarding the fulfilment of legal obligations, Art. 6 para. 1 sentence 1 lit. c GDPR is relevant as a legal basis. Furthermore, data processing may take place in accordance with Art. 6 (1) sentence 1 lit. f GDPR if we have a legitimate interest in doing so. Such a legitimate interest always exists if we have an economic, legal, or ideal interest and your interests worthy of protection do not outweigh this.

In the absence of a statutory legal basis, your personal data will be processed if you give your express consent pursuant to Art. 6 (1) sentence 1 lit. a GDPR in conjunction with Art. 7 GDPR. Failure to give this consent or its revocation does not affect the possibility of recourse to legal bases of authorisation, in particular Art. 6 (1) sentence 1 lit. b GDPR ("necessity with regard to the performance of the contract"), Art. 6 (1) sentence 1 lit. c GDPR ("legal obligation") and Art. 6 (1) sentence 1 lit. f GDPR ("legitimate interest") regarding data processing. You have the option of giving your declaration of consent voluntarily. Not giving your consent or revoking it will not have any disadvantages for you. You can request to inspect your consent at any time and revoke it at any time by sending us an e-mail or by post. The revocation of consent does not affect the permissibility of the processing carried out until the revocation. You will find our contact details above and at the end of this data protection notice.

In some cases, we use external service providers to process your data. These have been carefully selected and commissioned by us, are bound by our instructions, and are regularly monitored. The requirements of Art. 28 GDPR are observed.

Recipient of the data

Recipients of personal data are service providers or contractors that we commission, e.g., data centre service providers, IT partners, banks, document shredders, software manufacturers, etc. and who process personal data on our behalf. These processors are contractually bound by us to observe professional secrecy and to comply with the requirements of the GDPR, Art. 28 GDPR and the FDPA.

Information on transmission to a third country

Data processing takes place both in member states of the European Union (EU) and in third countries. Any transfer to a third country generally only takes place if the specific requirements of Art. 44 et seq. GDPR are fulfilled.

Advertising

The EWM Group intends to process the data provided by you or collected by us in the event of an existing business relationship, if necessary, also for advertising purposes. The legal basis in this case is Art. 6 (1) sentence 1 lit. f GDPR ("legitimate interest"). According to the recitals to the GDPR, such a legitimate interest exists in particular with regard to direct marketing (recital 47, sentence 7). The term direct advertising is understood to mean the direct approach of a customer by a provider, in this case by us, with the aim of promoting the sale of services, among other things. The advertising is carried out by post, by electronic means (e-mail), by SMS/MMS or by telephone call. The requirements of § 7 UWG are of course observed. The advertising measures relate to newsletters, information letters, invitations, and announcements of EWM Group events. You can object to the processing of your personal data for advertising purposes at any time. The relevant contact details are listed above in this data protection notice. In this case, your personal data will no longer be processed for advertising purposes and will be deleted from the advertising mailing lists.

Contracts on joint responsibility according to Art. 26 GDPR

Between EWM GmbH (and the companies of the EWM Group shown at <https://www.ewm-group.com/en/contact/branches.html> (Europe)) a contract on joint responsibility in the sense of Art. 26 GDPR has been concluded in each case. The above-mentioned contracting parties jointly determine the corresponding purposes and essential means of the processing of certain personal data in the areas of personnel, marketing and the use of the joint CRM system.



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We are happy to comply with our legal obligation regarding the provision of the essential points of the contract of joint responsibility. You can access this information at https://www.ewm-group.com/images/pdf/datenschutz/EN_EDV-IT_IN_Contract_common_responsibility-Information_sheet.pdf.

Duration of the processing

We store personal data according to a general deletion concept that applies to us. According to this, personal data is assigned to a deletion class. In this deletion class, storage periods and regular deletion periods are assigned for personal data. After the regular deletion periods have expired, the personal data is deleted.

The maximum storage period depends on the purpose of the data processing, e.g., compliance with statutory retention obligations (e.g., retention obligations under commercial and tax law according to § 257 HGB, § 147 AO up to ten years).

Security / Technical and organisational measures

We take all necessary technical and organisational measures, considering the requirements of Articles 24, 25 and 32 GDPR, to protect your personal data against loss, destruction, access, alteration, or dissemination by unauthorised persons and against misuse. For example, we comply with the legal requirements for pseudonymisation and encryption of personal data, confidentiality, integrity, availability and resilience of systems and services related to processing, availability of personal data and the ability to quickly restore it in the event of a physical or technical incident, as well as the establishment of procedures to regularly review, assess and evaluate the effectiveness of technical and organisational measures to ensure the security of processing. Furthermore, we also observe the requirements of Art. 25 GDPR regarding the principles of "privacy by design" (data protection through technology design) and "privacy by default" (data protection through data protection-friendly default settings).

Your rights

You have a right to access your personal data free of charge (Art. 15 GDPR) and, if the legal requirements are met, a right to rectification (Art. 16 GDPR), erasure (Art. 17 GDPR) of your data, restriction of processing (Art. 18 GDPR), data portability (Art. 20 GDPR) and a right to object to processing (Art. 21 GDPR).

Insofar as we base the processing of your personal data on the balance of interests, you can object to the processing. This is the case if the processing is not necessary for the performance of a contract with you. When exercising such an objection, we ask you to explain the reasons why we should not process your personal data as we have done. In the event of your justified objection, we will examine the merits of the case and either discontinue or adapt the data processing or show you our compelling legitimate grounds based on which we will continue the processing.

Insofar as the processing is based on Art. 6(1)(a) GDPR (consent) or Art. 9(2) GDPR in connection with special types of personal data, i.e., on the consent of the data subject, we inform you that you have the right to revoke the consent at any time without this affecting the lawfulness of the processing carried out on the basis of the consent until revocation.

You can assert these rights directly against us or against our data protection officer. You can find the relevant contact details above.

You also have the option of complaining to the competent supervisory authority:

The State Commissioner for Data Protection and Freedom of Information Rhineland-Palatinate

Hintere Bleiche 34

55116 Mainz

Provision of personal data

Our company offers various services, the basis of which is a contract concluded between you as the person concerned and our company (e.g., purchase contract). Here you have the obligation to provide certain personal data. This is the data we need to fulfil the contracts (e.g., address, payment data). If this data is not provided, contracts with our company cannot be concluded.

Automated decision making and profiling

Our company does not take any measures of automated decision-making) in individual cases or so-called profiling (e.g., information on preferences or the behaviour of the data subject) within the meaning of Art. 22 GDPR.