

INFORMATION OBLIGATIONS PURSUANT TO ART. 13 GDPR for our business partners, interested parties, applicants, employees, etc.

The protection of your personal data is of particular importance to us. We therefore process your personal data (in short "data") exclusively on the basis of the statutory provisions. With this Privacy Policy, we want to provide you with comprehensive information about the processing of your data in our company and the data protection claims and rights to which you are entitled pursuant to Art. 13 of the European General Data Protection Regulation (EU GDPR).

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

The responsible party is:

Nabaltec AG
Alustraße 50 – 52
92421 Schwandorf
Germany
E-mail: info@nabaltec.de
Tel.: +49 9431 53-0

The company Data Protection Officer is:

Christian Volkmer
Projekt 29 GmbH & Co. KG
Ostengasse 14
93047 Regensburg
Germany
E-mail: c.volkmer@projekt29.de
Tel.: 0941-2986930

2. Which data are processed and from which sources do these data originate?

We process the data, which we have received from you within the scope of contract initiation or contract processing, on the basis of consent or within the scope of your application to us or your employment with us.

Personal data include:

Your master/contact data, which include for **customers** e.g. first and last name, address, contact details (e-mail address, telephone number, fax), bank details.

For **applicants and employees**, this includes, for example, first and last name, address, contact details (e-mail address, telephone number, fax), date of birth, data from resume and work references, bank details, religious affiliation.

For **business partners**, this includes, for example, the name of their legal representative, company, commercial register number, VAT ID number, company number, address, contact details of contact person (e-mail address, telephone number, fax), bank details.

In addition, we also process the following personal data:

- Information on the type and content of contract data, order data, sales and document data, customer and supplier history,
- Advertising and sales data,
- Information from your electronic communication with us (e.g. IP address),
- Other data that we have received from you within the scope of our business relationship (e.g. in customer meetings),
- Data that we generate ourselves from master/contact data and other data, such as data from customer requirement analyses and customer potential analyses,
- The documentation of your declaration of consent to receive, for example, newsletters.

3. For what purposes and on what legal basis are the data processed?

We process your data in accordance with the provisions of the General Data Protection Regulation (GDPR) and the Federal Data Protection Act [Bundesdatenschutzgesetz] 2018, in the applicable version:

- **To fulfill (pre-)contractual obligations (Art. 6(1) b GDPR):**
The processing of your data takes place for the purpose of contract processing. The data will be processed in particular during the initiation of business transactions and the execution of contracts with you.
- **To fulfill legal obligations (Art 6(1) c GDPR):**
The processing of your data is necessary for the purpose of fulfilling various legal obligations, e.g. from the Commercial Code [Handelsgesetzbuch] or the Tax Code [Abgabenordnung].
- **To protect legitimate interests (Art 6(1) f GDPR):**

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On the basis of a weighing of interests, data processing may take place beyond the actual fulfillment of the contract in order to protect the legitimate interests of us or third parties. Data processing to protect legitimate interests is carried out in the following cases, for example:

- Advertising or marketing (see No. 4),
- Measures for business management and the further development of services and products,
- Within the scope of legal proceedings.
- **Within the scope of your consent (Art 6(1) a GDPR):**
If you have given us your consent to the processing of your data, for example, to send our newsletter.

4. Processing of personal data for advertising purposes

You may object to the use of your personal data for advertising purposes at any time in general or for individual measures without incurring any costs other than the transmission costs according to the basic tariffs.

Under the legal requirements of Section 7 Para. 3 German Unfair Competition Act [UWG], we are entitled to use the e-mail address you provided when concluding the contract for direct advertising for our own similar goods or services. You will receive these product recommendations from us regardless of whether you have subscribed to a newsletter or not.

If you do not wish to receive such recommendations by e-mail from us, you may object to the use of your address for this purpose at any time without incurring any costs other than the transmission costs according to the basic tariffs. A message in text form is sufficient for this purpose.

5. Who receives my data?

If we use a service provider for the purpose of order processing, we nevertheless remain responsible for the protection of your data. All processors are contractually obliged to treat your data confidentially and to process them only within the scope of the service provision. The processors commissioned by us will receive your data insofar as they require the data for the performance of their respective service. These are, for example, IT service providers that we need for the operation and security of our IT system.

6. How long will my data be stored?

We process your data until the business relationship comes to an end or until the expiry of the applicable statutory retention periods (e.g. from the Commercial Code, the Tax Code or the Working Time Act [Arbeitszeitgesetz]); furthermore until the conclusion of any legal disputes in which the data are required as evidence.

7. Are personal data transferred to a third country?

In principle, we do not transfer any data to a third country. A transfer will only take place in individual cases on the basis of an adequacy decision by the European Commission, standard contractual clauses, appropriate safeguards or your express consent.

8. What data protection rights do I have?

You have the right at any time to information, rectification, erasure or restriction of the processing of your stored data, a right of objection to the processing as well as a right to data portability and a right to lodge a complaint in accordance with the requirements of data protection law.

Right to information:

You may request information from us as to whether and to what extent we process your data.

Right to rectification:

If we process your data and these are incomplete or inaccurate, you may request that we rectify or complete them at any time.

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Right to erasure:

You may request that we erase your data if we process them unlawfully or if the processing disproportionately impacts your legitimate protection interests. Please note that there may be reasons that prevent an immediate erasure, e.g. in the event of legally regulated retention obligations.

Irrespective of the exercising of your right to erasure, we will erase your data immediately and completely, insofar as there is no legal or statutory obligation to retain data in this respect.

Right to restriction of processing:

You may request that we restrict the processing of your data if

- you dispute the accuracy of the data for a period of time that enables us to verify the accuracy of the data,
- the processing of the data is unlawful, but you reject an erasure of the data and instead request a restriction of the use of the data,
- we no longer need the data for the intended purpose, but you still need these data to assert or defend legal claims, or
- you have lodged an objection to the processing of the data.

Right to data portability:

You may request that we transfer to you the data you have provided to us in a structured, common and machine-readable format so that you may provide these data to another controller without our interference, provided that

- we process these data on the basis of a consent given and revocable by you or for the fulfillment of a contract between us, and
- such processing is carried out using automated methods.

If technically feasible, you may request that we transfer your data directly to another controller.

Right to object:

If we process your data on the basis of a legitimate interest, you may lodge an objection to such processing at any time; this would also apply to profiling based on these provisions. We will then no longer process your data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims. You may object to the processing of your data for the purpose of direct advertising at any time without giving reasons.

Right to lodge a complaint:

If you believe that we are violating German or European data protection law by processing your data, we ask you to contact us in order to clarify the matter. Of course, you also have the right to contact the supervisory authority responsible for you, the respective state office for data protection supervision.

If you wish to assert any of the aforementioned rights against us, please contact our Data Protection Officer. In case of doubt, we may request additional information to confirm your identity.

9. Am I obliged to provide data?

The processing of your data is necessary to conclude or fulfill your contract with us. If you do not provide us with these data, we will generally have to refuse to conclude the contract or will no longer be able to execute an existing contract and will therefore have to terminate it. However, you are not obliged to give your consent to data processing with regard to data which are not relevant for the fulfillment of the contract or which are not required by law.