

Privacy Notice for Customers, Suppliers and Service Providers

Version 1.2 dated 09 May 2018

DORMA Hüppe Raumtrennsysteme GmbH
Industriestraße 5
26655 Westerstede

DORMA Hüppe Raumtrennsysteme GmbH takes the protection of your personal data very seriously and always processes your personal data in accordance with the statutory data protection regulations. With this privacy notice we would like to give you an overview of the processing of your personal data by us and of your related rights. Which data is processed or used by us in detail is largely determined by your relationship with our company. Therefore not all parts of this privacy notice will necessarily apply to you.

A. Controller and Data Protection Officer

- a. The controller responsible for the processing of your personal data is

DORMA Hüppe Raumtrennsysteme GmbH
Industriestraße 5
26655 Westerstede
+49 4409 666-0
+49 4409 666-287
info-hueppe@dormakaba.com

- b. You can reach our Data Protection Officer at

MERENTIS DataSec GmbH
Data Protection Department
Tobias K. Eicke
-Attorney at Law-

Kurfürstenallee 130
28211 Bremen
e-mail: teicke@merentis.com

B. How we collect your personal data

We process personal data that we receive from you when you contact us. We collect data from customers, for example, when you use our online contact form, when you call our free information hotline or when you send an e-mail to our central contact address with your request.

Suppliers and service providers register in the supplier portal in order to take part in tenders and, beyond that, to be considered as contractual partners. We collect your data during your registration.

We obtain the delivery addresses of our customers from our contractual partners in order to be able to ship our products to the correct place of delivery. In this way we receive your data from our contractual partner, who has previously collected it directly from you.

In addition, we process personal data that we legitimately obtain from publicly accessible sources (e.g. debtor registers) or that is legitimately transmitted to us by other dormakaba companies or by other third parties such as credit agencies.

Relevant personal data is:

- personal identification data and contact information (e.g. title, name, address, date of birth, e-mail address, telephone number);
- payment data (e.g. account details);
- data from the fulfilment of our contractual obligations (e.g. delivery addresses, addresses of properties with repair orders, invoice data);
- information about your financial situation (e.g. creditworthiness data);
- data about your online behaviour and preferences (e.g. IP addresses, identification features of mobile devices, data about visits to our websites and apps, geolocation data);
- advertising and sales data (e.g. information on consents given or withdrawn).

C. Purpose and legal basis of the processing

We process personal data in accordance with the EU General Data Protection Regulation (EU GDPR) and the German Federal Data Protection Act 2018 (new BDSG).

1.1 to fulfil contractual obligations (Article 6(1)(b) EU GDPR)

The processing is carried out to fulfil the contract with you or to carry out pre-contractual measures taken at your initiative.

This is the case, for example, when you order spare parts, services or products from us.

Suppliers and service providers register, among other things, in our tendering portal in order to take part in tenders, so that a contractual relationship can arise.

We also transmit your address data to logistics companies and skilled-trade subcontractors in order to fulfil our obligation and to be able to install or maintain the product. It is also possible that we receive your address data because you have been named as a contact person for an installation or maintenance, e.g. by your landlord.

You can find further details on the purposes of data processing in the relevant contract documents and terms and conditions.

1.2 as part of a balancing of interests (Article 6(1)(f) EU GDPR)

The processing is carried out to safeguard legitimate interests of us or third parties, unless your interest worthy of protection prevails. Examples:

- internal procurement market analysis;
- internal data processing and analysis to ensure individual customer approach with tailored offers;

- internal data processing and analysis for the purpose of improving and developing intelligent and innovative services and products;
- assertion of legal claims and defence in legal disputes;
- prevention and investigation of criminal offences;
- video surveillance to safeguard domiciliary rights and to collect evidence in criminal offences;
- comparison of your data with sanctions and embargo lists of the European Union;
- keeping a visitor list of our business premises, including recording of name and vehicle registration number.

1.3 on the basis of your consent (Article 6(1)(a) EU GDPR)

If you have given us consent to process your personal data for certain purposes (e.g. for advertising contact by telephone, participation in a competition), the processing is lawful on this basis. Consent given can be revoked at any time. This also applies to the revocation of declarations of consent given to us before the EU GDPR came into force, i.e. before 25 May 2018. The revocation of consent only takes effect for the future and does not affect the lawfulness of the data processing up to the revocation.

1.4 on the basis of legal requirements (Article 6(1)(c) EU GDPR)

To fulfil tax and commercial law requirements, your personal data will be stored for a period described in more detail below. We are also obliged to observe EU embargo and boycott lists when supplying customers or when engaging suppliers and service providers.

D. Recipients of the personal data

Within our company, those departments gain access to your data that need it to fulfil their respective function in the company or to fulfil our contractual or legal obligations.

Service providers engaged by us may also receive data. These are primarily other dormakaba companies as well as companies in the categories of postal and printing service providers, IT service providers, telecommunications service providers (call centres), sales partners, web service companies, credit agencies, debt collection agencies and other service providers that we use as processors.

Under certain conditions, personal data may also be passed on to public bodies, e.g. tax authorities, judicial and law enforcement authorities (e.g. police, public prosecutors, courts), lawyers and notaries as well as auditors.

In detail, the following recipients receive your personal data from us:

To whom?	Where to?		
Forwarding of data to the following recipients	Recipient in the following destination country		
	D	EU	Third country
Within the company to other departments: Purchasing, Order Processing, Financial Accounting	☒	☐	☐

Within the corporate group to affiliated companies:	to the Legal Department dormakaba International Holding GmbH, Ennepetal	☒	☐	☐
	to Group Legal dormakaba International Holding AG, Hofwisenstr. 24, 8153 Rümlang, Switzerland	☐	☐	☒
To other recipients outside the company	to customers	☒	☐	☐
	to suppliers	☒	☐	☐
	to authorities	☒	☐	☐
	to banks	☒	☐	☐
	to service providers, e.g. service data centres, remote maintenance, call centre, help desk	☒	☐	☐
	to marketing agencies	☐	☐	☐
	to a debt collection agency	☒	☐	☐
	to tax advisors/lawyers	☒	☐	☐

E. Transfer to third countries or international organisations

We do not transfer your personal data to bodies outside the European Economic Area, so there is no so-called "third-country transfer".

F. Duration of storage

We delete your personal data in principle when the purpose of the processing has been fulfilled, all mutual claims have been satisfied and there are no other statutory retention obligations or legal justification bases for the storage.

Statutory retention obligations arise in particular from the German Commercial Code (HGB) and the German Fiscal Code (AO). The retention periods specified there are generally six to ten years. Where necessary, e.g. to secure evidence, customer data is kept until the statutory limitation periods expire. According to § 195 BGB (German Civil Code), this period is three years.

G. Your data protection rights

You have the following data protection rights in accordance with the statutory provisions:

1. the right of access to the data stored by us (Article 15 EU GDPR) and
2. the right to rectification (Article 16 EU GDPR),
3. the right to erasure (Article 17 EU GDPR),

4. the right to restriction of processing (Article 18 EU GDPR),
5. the right to data portability (Article 20 EU GDPR),
6. and the right to object (Article 21 EU GDPR)

In addition, you have the right to lodge a complaint with the competent supervisory authority:

The State Commissioner for Data Protection of Lower Saxony,

Prinzenstraße 5, 30159 Hannover,

Phone: +49 511 120 45 00

E-mail: poststelle@lfd.niedersachsen.de

H. Is there an obligation to provide the data?

In the course of our business relationship, you must provide the personal data that is necessary for the establishment, execution and termination of a business relationship and for the fulfilment of the associated contractual obligations, or that we are legally obliged to collect. Without this data, we will generally not be able to conclude or execute a contract with you.

In addition, our contract forms and our websites transparently indicate which information is voluntary and which is mandatory.

- I. We obtain creditworthiness information on customers and other contractual partners. In this activity we assess whether your creditworthiness is sufficient to conclude a certain contract with you. This decision is made in a partially automated manner using statistical methods with the help of information from credit agencies.

To establish and carry out the business relationships, we generally do not use fully automated decision-making processes within the meaning of Article 22 EU GDPR and do not process your data with the aim of evaluating certain personal aspects (profiling).

J. Right to object

1. Case-specific right to object

You have the right to object at any time, on grounds relating to your particular personal situation, to the processing of your personal data where the processing is based on the legal basis regulated in Article 6(1)(e) EU GDPR (processing in the public interest) and Article 6(1)(f) EU GDPR (data processing on the basis of a balancing of interests). This also applies to profiling based on this provision.

In the event that you object, we will refrain from processing your personal data, except in the case that we can demonstrate compelling legitimate grounds for the necessity of the processing which override your interests, rights and freedoms, or that the processing serves the assertion, exercise or defence of legal claims.

2. **Right to object to the processing of data for the purposes of direct marketing**

In individual cases, we may process your personal data in order to carry out direct marketing. You have the right to object at any time to the processing of your personal data for the purpose of such marketing. This also applies to profiling associated with such direct marketing, which we do not use, however (see above).

3. **Recipient of the objection**

You can address your objection informally with the subject "Objection", stating your name, your address and your date of birth, to us at:

info-hueppe@dormakaba.com