

## Data privacy statement for customers, suppliers and service providers

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DORMA Hüppe Raumtrennsysteme GmbH + Co. KG  
Industriestraße 5  
26655 Westerstede

DORMA Hüppe Raumtrennsysteme GmbH + Co. KG takes the protection of your personal data very seriously and always handles your personal information in compliance with data privacy law. In this data privacy statement we would like to give you an overview of how we handle your personal data and the rights you have in this regard. Exact details of the data we handle or use is essentially determined by your relationship with our company. For this reason it is possible that not all parts of this data privacy statement apply to you.

### **A. Person responsible and data protection officer**

- a. Responsibility for the handling of your personal data is assumed by

DORMA Hüppe Raumtrennsysteme GmbH + Co. KG  
Industriestraße 5  
26655 Westerstede  
+49 4409 666-0  
+49 4409 666-287  
[info-hueppe@dormakaba.com](mailto:info-hueppe@dormakaba.com)

- b. You can contact our data protection officer at

MERENTIS DataSec GmbH  
Data protection and privacy  
Tobias K. Eicke  
-General Practice Lawyer-

Kurfürstenallee 130  
28211 Bremen  
email: [teicke@merentis.com](mailto:teicke@merentis.com)

### **B. How do we collect your personal data**

We handle the personal data we receive from you when you contact us. We collect customer data for instance if you use our online contact form, call our free info hotline, or send an email to our central contact address detailing your concern.

Suppliers and service providers register on the supplier portal to enable them to take part in RFPs and also to allow them to be considered as a contract partner. We collect their data during the registration process.

We obtain the delivery addresses of our customers from our contract partners so that we can send our products to the correct delivery location. This is the route by which we receive their data from our contract partner, who collected it directly from you prior to that.

Furthermore we handle personal data that we are authorised to acquire from publicly accessible sources (e.g. debtors' lists) or which is lawfully passed to us by other dormakaba companies or other third parties, such as credit agencies.

Relevant personal data is:

- personal identification information and contact information (e.g. title, name, address, date of birth, email address, telephone number);
- payment data (e.g. account details);
- data arising from the fulfilment of our contractual obligations (e.g. delivery addresses, addresses of contract facilities with repair orders, invoice data);
- information about your financial situation (e.g. credit ratings);
- data about your online behaviour and preferences (e.g. IP addresses, identification characteristics of mobile devices, data on visits to our websites and apps, geo-localisation data);
- advertising and sales data (e.g. information about issued/withdrawn consents).

### **C. Purpose and legal basis for data handling**

We handle personal data in compliance with the EU General Data Protection Regulation (EU-GDPR) and the German Federal Data Protection Act 2018 (BDSG-Neu)

#### ***1.1 for the fulfilment of contractual obligations (Article 6 Paragraph 1 Point b EU-GDPR)***

Data is handled in order to fulfil the contract with you or to execute pre-contractual measures initiated by you.

This is the case for instance if you order replacement parts, services or products from us.

Suppliers and service providers register, for example on our RFP portal, to take part in RFPs so that a contractual relationship can be established.

In addition, we pass your address details to logistics companies and subcontracted tradesmen in order to fulfil our obligation and install/maintain the product. It is also possible that we receive your address details because you were given as a contact person for installation or maintenance, for instance by your landlord.

Further details on the data handling purposes can be found in the relevant contract documents and Terms & Conditions of Business.

#### ***1.2 where balancing of interests is involved (Article 6 Paragraph 1 Point f EU-GDPR)***

Data is handled so as to preserve our own legal interests or those of third parties, insofar as your legitimate interest does not take precedence. Examples:

- internal acquisition market analysis,
- internal data handling and analysis to guarantee that customers are addressed with an individual approach with tailored products and services,
- internal data handling and analysis for the purpose of improving and developing intelligent and innovative services and products,
- enforcement of legal claims and defence in legal conflicts,
- prevention and resolution of criminal offences,
- video surveillance to preserve domiciliary rights as well as to gather evidence in the event of criminal offences,
- reconciliation of your data with European Union sanction and embargo lists,

- maintaining a visitor list on our company premises including keeping a record of names and vehicle registrations.

### 1.3 on the basis of your consent (Article 6 Paragraph 1 Point a EU-GDPR)

In the event that you have given us consent to handle your personal data for specified purposes (e.g. *advertising telephone calls, entry in prize draws*), data handling on this basis is lawful. Consent issued can be withdrawn at any time. This also applies to the withdrawal of consent declarations issued to us before the EU-GDPR came into force, in other words before 25th May 2018. Withdrawal of consent is applicable to the future and does not affect the legality of data handling up to the point of withdrawal.

### 1.4 on the basis of legal requirements (Article 6 Paragraph 1 Point c EU-GDPR)

Your personal data is stored for a period described in more detail below to fulfil requirements specified under tax and commercial law. We are also obliged to take into consideration the embargo and boycott lists specified under trade union law when we supply to customers, as well as the obligation of suppliers and service providers.

#### D. Recipients of the personal data

Access to your data is granted to those areas within our company that need this in order to fulfil their function in the company or to fulfil our contractual or legal obligations.

Any service providers commissioned by us can also receive data. Initially these are other companies within the dormakaba group, as well as companies in the categories postal and printing service providers, IT service providers, telecommunication providers (call centres), sales partners, internet service providers, information services, debt collection agencies, as well as other service providers we may use within the context of order processing.

Under certain conditions it is also possible for personal details to be passed to public offices, e.g. tax offices, authorities of jurisdiction and criminal justice (e.g. police, public prosecutors, courts), lawyers and notaries, as well as auditors.

The list below details recipients of your personal data:

Who?		Where?		
Passing your details to the following recipients		Recipients in the following destination country		
		D	EU	Third country
To other departments within the company: Purchasing, order processing, accounts		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
To associated companies within groups:	to the legal department of dormakaba International Holding GmbH, Ennepetal	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	to Group Legal dormakaba International Holding AG, Hofwisenstr. 24, 8153 Rümlang,	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> Switzerland
To other areas outside the company	to customers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	to suppliers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	to public authorities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	to banks	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	to service providers, e.g. service data centre, remote maintenance, call centres, help desks	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	to marketing agencies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	to debt collection agencies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	to tax advisors / lawyers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**E. Passing data to third countries or to international organisations**

We do not pass your personal data to areas outside the European Economic Area so that a so-called "third country transfer" situation does not arise.

**F. Duration of storage**

We always delete your personal data when the purpose of handling has expired, all mutual claims are fulfilled, and no other legal retention requirements or justifications for storage exist.

Legal retention requirements arise in particular on the basis of the German Commercial Code (HGB) and Fiscal Code (AO). The retention periods are usually six to ten years. Insofar as required, e.g. for securing evidence, customer data is retained until the statutory limitation period has expired. This period is three years as specified under § 195 BGB (German Civil Code).

**G. Your data protection rights**

You have the following data protection rights according to statutory regulations:

1. the right of access to the data stored by us (Article 15 EU-GDPR), as well as
2. the right to rectification (Article 16 EU-GDPR),
3. the right to erasure (Article 17 EU-GDPR),
4. the right to limitation of processing (Article 18 EU-GDPR),
5. the right to data portability (Artikel 20 EU-GDPR),
6. and the right to lodge a complaint (Artikel 21 EU-GDPR)

Furthermore you have the right to approach the relevant supervisory board with any complaints:

Die Landesbeauftragte für den Datenschutz Niedersachsen (state official for data protection in Lower Saxony),

Prinzenstraße 5, 30159 Hannover,

Phone: +49 (0)511 120 45 00

Email: [poststelle@fd.niedersachsen.de](mailto:poststelle@fd.niedersachsen.de)

#### **H. Is there an obligation to make the data available?**

Within our business relationship you must make available any personal data that is required to begin, maintain and finish a business relationship and to fulfill the contractual obligations associated with this, or that we are legally obliged to collect. Without this data we will generally not be in a position to conclude or execute a contract with you.

Furthermore it has been clearly identified in our contract forms as well as on our websites which information is voluntary and which is obligatory.

- I. We collect credit rating information on our customers and other contract partners. This activity allows us to evaluate whether your creditworthiness is sufficient to be able to conclude a contract with you. This decision is partially automated using statistical methods, with the help of information provided by credit agencies.

We never justify and carry out business relations based entirely on fully automated decision processes within the meaning of Article 22 EU-GDPR and we do not handle your data with the aim of evaluating certain personal aspects (profiling).

#### **J. Right to object**

##### **1. Right to object based on individual cases**

You have the right to object to the handling of your personal data at any time for reasons arising from your particular personal situation, if the data is handled on the basis of the legal principle regulated under Art. 6 Para. 1 Point e EU-GDPR (handling in the public interest) and Art. 6 Para. 1 Point f EU-GDPR (data handling on the basis of balancing of interests). This also applies to profiling based on this provision.

In the event that you lodge an objection, we will cease to handle your personal data, other than in the event that we can prove compelling justification of the necessity of handling it, which overrules your interests, rights and liberties, or that handling the data serves to enforce, exercise or defend any legal claims.

##### **2. Right to object against handling of data for purposes of direct advertising**

It can occasionally happen that we handle your personal data in order to conduct direct advertising. You have the right to object at any time to the handling of personal data relating to you for the purposes of advertising of this nature. This also applies to profiling associated with direct advertising of this nature that is not initiated by us (see above).

##### **3. Recipient of the objection**

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

[info-hueppe@dormakaba.com](mailto:info-hueppe@dormakaba.com)