

Information in accordance with Art. 13, 14 and 21 of the European General Data Protection Regulation (GDPR)

The present data protection information (the "information") applies to the processing of personal data by Schüco International KG and their subsidiaries based in the EU as part of the Schüco Group. Subsidiaries within the meaning of this information comprise all companies in which Schüco International KG directly or indirectly holds more than 50% of the shares.

The General Data Protection Regulation (GDPR) grants rights to you as the data subject with regard to the processing of personal data in Art. 12 et seq. of the GDPR, which we, as a company, must observe. The specific data that is processed and the way in which it is used depends largely on the relationship with you. Further information or explanations regarding the purposes of data processing can be found in the relevant contract documents, forms, declaration of consent, if applicable, and/or other information provided to you (e.g., when using our website).

This data protection information is updated at regular intervals.

Who is responsible for data processing and who to contact

Name: Schüco Eesti OÜ
Address: Pärnu mnt. 141, 11314 Tallin
Tel.: +372(6)671672

Contact information for the Data Protection Officer

Name: Schüco Eesti OÜ, Data Protection Division
Address: Pärnu mnt. 141, 11314 Tallin
Email: tiit@schueco.ee, Tel.: +372(6)671672

Legal basis and purposes of data processing

The storage of your data may have various legal bases.

The processing of your data depends on the type of service to be provided by us, as well as the type of relationship with you.

Art. 6 para. 1 letter b) Contract or initiation of a contract

Your personal data may be processed for the performance of our contracts with you and the processing of your orders as well as for the implementation of measures and activities within the scope of pre-contractual relationships, e.g., with you as the potential client.

Without processing your personal data, we cannot fulfil our contractual or pre-contractual obligations.

In particular, processing serves to fulfil our contractual obligations with regard to your orders and requests and includes the services, measures and activities required for this. In particular, this includes contract-related communication with you, the traceability of transactions, orders and other agreements as well as for quality assurance through corresponding documentation, goodwill processes, measures for the control and optimisation of business processes as well as to fulfil our general due diligence obligations, inspection and monitoring by affiliated companies; statistical evaluations for corporate management, cost recording and controlling, reporting, internal and external communication, invoicing and tax evaluation of company services, risk management, the assertion of legal claims and defence in legal disputes; provision of IT security and general security, incl. building and plant security, guarantee and exercise of domiciliary rights (e.g., by means of access control); safeguarding the integrity, authenticity and availability of data, prevention and investigation of criminal offences; monitoring by supervisory bodies or control bodies (e.g., auditing).

Art. 6 para. 1 letter f) Our legitimate interest or the legitimate interest of third parties

Beyond the actual fulfilment of contracts or pre-contracts, we shall process your data (i.e., as a client or potential client) if applicable, if it is necessary in order to preserve our legitimate interests or those of third parties and your data does not conflict with legitimate interests.

Processing takes place for the following purposes in particular:

- Disclosure in the context of the business activities;
- The external presentation of our company (photo, video and audio recordings or events and trade fairs) for marketing purposes and in order to promote sales;
- Obtaining information as well as exchanging data with credit agencies, insofar as this extends beyond our economic risk;
- The further development of services and products as well as existing systems and processes;
- Ensuring IT security and IT operation as well as websites, the performance of load tests, development of new products and systems and the adaptation of existing products and systems, migration of data to ensure the load-bearing capacity and integrity of the systems and thereby, in a broader sense, also the data that has been processed. The personal data provided is thereby used predominantly for tests, where this cannot be done on the basis of anonymous data at a reasonable cost. In this instance, data security is constantly ensured in accordance with Art. 32 of the GDPR.
- The enrichment of our data, incl. through the use or research of publicly accessible data;
- Statistical evaluations or market analysis on services rendered and for consultation and satisfaction surveys, provided that, as a result of the balance of interests, the respective market research activities can be regarded processing to serve a legitimate interest. Otherwise, we will only use your data for these purposes with your specific consent, which may be revoked at any time.
- The assertion of legal claims and defence in legal disputes which cannot be attributed directly to the contractual relationship;
- The restricted storage of data, if erasure is not possible due to the particular type of storage or would require disproportionately high effort;
- The prevention and investigation of criminal offences, where this is not exclusively for the purpose of fulfilling legal requirements;
- The security of the building and plant (e.g., by means of access control and video surveillance), insofar as this extends beyond the general due diligence obligations;
- The guarantee and exercise of domiciliary rights through suitable measures, as well as through video surveillance, for the protection of our clients and employees as well as for the preservation of evidence in, and prevention of, criminal offences;
- Sending product information (direct advertising) regarding our products, which are similar to those that you have already purchased from us, if you have not objected to the use of your personal data for this purpose.

Art. 6 para. 1 letter a) Consent

If you have consented to the processing of your personal data (e.g., use of your data for marketing purposes), the consent constitutes the legal basis for the data processing, alongside other legal bases, if applicable. Your consent may be revoked at any time with effect for the future by sending a letter by post Schüco Eesti OÜ, Data Protection Division, key words: Data subject rights, Pärnu mnt. 141, 11314 Tallin. You will be informed separately of the purposes and consequences of revoking or not granting consent in the relevant text in the consent process.

Art. 6 para. 1 letter c) Fulfilment of legal provisions or Art. 6, para. 1 letter e) Public interest

Like every company which participates in economic affairs, we are also subject to a large number of legal obligations. Primarily, these are legal requirements (e.g., commercial and fiscal laws, social legislation provisions), but also requirements pertaining to regulatory law or other official authorities, if applicable.

The purposes of processing include, if applicable, the verification of identity and age, the prevention of fraud and money-laundering, the prevention of, fight against, and investigation of the funding of terrorism and criminal offences which threaten to damage assets, comparisons with European and international sanctions lists, the fulfilment of inspection and reporting obligations pertaining to fiscal and foreign trade law, as well as the archiving of data for the purposes of data protection and data security, and inspection by tax authorities and other authorities. Personal data which Schüco International KG and their subsidiaries based in the EU as part of the Schüco Group collects and processes when carrying out comparisons with sanctions lists is processed exclusively for these purposes.

Furthermore, the publication of personal data may be required in official/judicial measures for the purposes of the collection of evidence, law enforcement or the enforcement of civil law claims.

The categories of data processed by us, if we do not receive the data directly from you, and its origin

If this is required in order to render our services, we process personal data which has been permissibly received from other companies or other third parties (e.g., credit agencies, directory publishers). Furthermore, we process personal data which we have permissibly taken, received or purchased from publicly accessible sources (e.g., telephone directories, registers of companies and associations, civil registers, debtor registers, land registers, the press, the Internet and other media) and which we are entitled to process.

Relevant personal data categories can include, in particular:

- Data regarding your person (name, data of birth, place of birth, nationality, family status, job/sector and comparable data);
- Contact information (address, email address, telephone number and comparable data);
- Address data (reported data and comparable data);
- Payment/coverage confirmation for bank and credit cards;
- Information on your financial situation (credit information including scoring, data on the evaluation of economic risk);
- Client history;
- Data on your use of the telemedia provided by us (e.g., time of visiting our websites, apps or newsletter, pages/links clicked or posts and comparable data) video data.

Recipients or categories of recipients of your data

Within our company, each internal office or organisational unit which requires your data for the fulfilment of our contractual and legal obligations or during the processing and implementation of our legitimate interest shall receive your data.

Your data is only shared with external bodies to the extent required to render the service, for example, in connection with the processing of contracts or with your consent.

- For the purposes of fulfilling legal requirements, according to which we are obligated to provide, report or transfer data or if the data transfer is in the public interest;
- Insofar as external service provision companies process data on our behalf as a data processor or if the function has been transferred to them. This includes, in particular, the following categories of service providers:
 - ✓ IT service providers and IT support for the purpose of project management, website management, the definition of requirements, the introduction, adaptation and development of software and the supervision and maintenance of IT systems and the execution of on-going IT activities;
 - ✓ Scanning and printing service providers;
 - ✓ Software and service providers (provision of IT applications), e.g., for the dispatch of emails or for administrative activities;
 - ✓ Security service providers for the protection of physical security and data security;
 - ✓ Advertising agencies to execute advertising campaigns;
 - ✓ Trade fair service providers which have been commissioned by Schüco International KG and their subsidiaries based in the EU as part of the Schüco Group to optimise your trade fair experience (e.g., registration, RFID cards);
 - ✓ Market research institutes which carry out market analysis or interview participating persons on behalf of Schüco International KG and their subsidiaries based in the EU as part of the Schüco Group;
 - ✓ Call centre services, controlling, data validation or plausibility verification, data destruction, purchasing/acquisition, customer management, letter shops, marketing, media technology, research, risk controlling, invoicing, telephone services, auditing services, credit institutes, printers or companies which dispose of data.

On the basis of our legitimate interest or the legitimate interest of a third party.

Other recipients

Your personal data may be transmitted in particular to the following third parties within the contractual relationship and, in particular, in connection with our service obligation - on a case-by-case basis:

- Affiliated companies within the Schüco Group (due to the jointly used group IT systems and the international characteristic of our business, personal data which is processed by companies in the Schüco Group [affiliated companies] may be shared between the companies within the Schüco Group.);
- Lawyers, tax consultants, insolvency administrators, auditors;
- Post services, courier services and logistics partners;
- Cooperative partners such as hotels, rental car companies, if we take over booking for you - for example in relation to your trade fair visit;
- Trade fair organisers;

We shall not transfer your data to any other third parties. If we commission service providers to process data, your data is subject to the same security standards there as it is with us. In other cases, the recipients may only use the data for the purposes for which the data was transmitted to them.

Duration of the storage of your data

We shall process and store your data for the duration of our business relationship. This also includes the initiation of a contract (pre-contractual legal relationship) and the processing of a contract.

Furthermore, we are subject to various retention and documentation obligations which result from the German Commercial Code (HGB) and the Fiscal Code of Germany (AO), among others. The retention and documentation periods listed in this legislation are up to ten years after the end of the business relationship of the pre-contractual legal relationship.

Furthermore, special legal provisions may require a longer retention period, e.g., for the preservation of evidence within the framework of legal limitation periods. In accordance with Sections 195 et seq. of the German Civil Code (BGB), the usual statute of limitations is three years; however, limitation periods of up to 30 years may also be applicable.

If the data is no longer required for the fulfilment of the purpose for processing, this shall be regularly deleted, unless its - temporary - further processing is required on the basis of our compelling legitimate interest. Such a compelling legitimate interest also applies, e.g., if the deletion is not possible due to the particular type of storage or it requires a disproportionately high amount of effort, and processing for other purposes is excluded through suitable technical and organisational measures.

Rights to information, erasure, objection and other data subject rights according to Art. 15-22 of the GDPR

Furthermore, you may assert your data subject rights against us in accordance with Art. 15-22 of the GDPR.

Right to information

You have the right to request confirmation from us regarding whether personal data relating to you is being processed; if this is the case, you have the right to information about this personal data and to the information listed in Art. 15 of the GDPR.

Right to correction

You have the right to request that we carry out the immediate rectification of incorrect personal data relating to you and, if applicable, the completion of incomplete personal data (Art. 16 of the GDPR).

Right to erasure

You have the right to request that the personal data relating to you is erased immediately, insofar as one of the reasons listed in Art. 17 of the GDPR applies, e.g., if data is no longer required for the purposes pursued.

Right to limitation of processing

You have the right to request the restriction of processing, if one of the requirements listed in Art. 18 of the GDPR applies, e.g., if you have filed an objection to the processing and the data processing is restricted for the duration of us performing the review.

Right to objection

You have the right to file an objection to the processing of personal data relating to you at any time for reasons which result from your personal situation. We shall no longer process the personal data unless we can prove compelling legitimate reasons for the processing which outweigh your interests, rights and freedoms, or the processing is carried out for the assertion, exercise or defence of legal claims (Art. 21 of the GDPR).

Right to file a complaint with a supervisory authority

You have the right to file a complaint with a supervisory authority if you believe that the processing of personal data relating to you breaches the GDPR (Art. 77 of the GDPR).

You may assert this right with a supervisory authority in the Member State in which you reside or work or in the Member State in which the suspected breach took place.

Status as of: November 2018