

July 2018

Information on the processing of customer and supplier data

The protection and lawful collection, processing and use of your data are of great importance to IGEPA group, as is the protection of your privacy. In order to ensure the confidentiality of your data in accordance with the provisions of data protection legislation, we have implemented technical and organisational measures to protect your data against manipulation, loss, destruction and unauthorised access.

This privacy policy details how your personal data are processed by IGEPA group GmbH & Co. KG and what rights you have under the data protection legislation.

1. Name and contact information of the controller and data protection officer

- 1.1 The controller in the sense of the European General Data Protection Regulation (GDPR) and other national data protection acts is:

IGEPA group GmbH & Co. KG
Heidenkampsweg 74-76
20097 Hamburg, Germany
Tel.: +49 40 72 77 88-0
Fax: +49 40 72 77 88 50
Email: info@igepagroup.com

- 1.2 You can contact our data protection officer at datenschutz@igepagroup.com, at our postal address by adding 'Data protection officer' to the address or by calling the number provided in item 1.1.

2. Categories of collected data as well as purposes and legal grounds of data processing

- 2.1 We process your personal data with consideration for the provisions of the GDPR, the German Federal Data Protection Act (BDSG) and all other relevant laws.
- 2.2 As part of the beginnings or execution of a contract, we collect the personal data that you provide to us through a contact form, by phone, email or post or in any other way. In particular, the processed categories include contact details (e.g. your name and surname, address, phone number and email address), contractual data (e.g. the contact details of representatives, contractual content and bank account details) and potentially even the date of and reason for contacting us.
- 2.3 As a rule, your personal data are collected from you directly during the initiation or execution of the contract. Furthermore, we also lawfully process personal data we receive from other companies or third parties (e.g. credit agencies) as well as

personal data we have lawfully obtained from publicly accessible sources (e.g. the commercial register or Internet).

- 2.4 First and foremost, the data are processed in order to establish or execute the contractual relationship with you, i.e. to deliver goods or provide other services as well as all related activities. The predominant legal grounds for this are provided by point (b) of Article 6 (1) GDPR. Additionally, any separate declaration of consent you have submitted can be used as consent under data protection legislation in accordance with point (a) of Article 6 (1) and Article 7 GDPR. We also process your data in order to fulfil our legal duties, especially with regard to tax and commercial law. This is carried out on the basis of point (c) of Article 6 (1) GDPR. Where necessary, we also process your data on the grounds of point (f) of Article 6 (1) GDPR in order to serve our own legitimate interests or those of third parties (e.g. authorities).
- 2.5 If we collect your email address, we can then use it to send a newsletter. In such a case, the newsletter will only contain direct advertising for similar goods or services provided by us. The legal grounds for sending the newsletter due to the purchasing of goods or utilisation of services are provided by Section 7 (3) of the German Act Against Unfair Competition (UWG) and point (f) of Article 6 (1) GDPR.
- 2.6 We will notify you in advance if we should wish to process your personal data for any other purpose than those described above.
- 2.7 You are not obliged to provide the personal data described above. However, the data might be necessary for establishing and executing a contract as well as fulfilling the related contractual obligations. If you do not provide the data, we might not be able to communicate with you and conclude or execute the contract.

3. Categories of recipient of personal data, transfers to third countries

- 3.1 Within our company, only the people and offices who need your personal data to fulfil our legal and contractual duties or for the purposes of processing and implementing our legitimate interests gain access to them. Additionally, your data are transmitted to certain companies within our group that carry out central data processing tasks (e.g. marketing and IT support). Data processing contracts have been signed with these companies in order to ensure that the statutory data protection regulations are complied with.
- 3.2 We will only disclose your data to third parties if you have expressly consented to it under point (a) of Article 6 (1) GDPR, if we are legally obliged to do so under point (c) of Article 6 (1) GDPR (e.g. financial authorities) and it is legally admissible, if it is necessary for the execution of the contract with you under point (b) of Article 6 (1) GDPR (e.g. logistics service providers or commercial credit insurance providers) or if we have a legitimate interest in doing so under point (f) of Article 6 (1) GDPR and we have no reason to assume that you have an overriding legitimate interest in the non-disclosure of your data (e.g. credit agencies, courts and lawyers).
- 3.3 We do not currently intend to transmit your personal data to a third country or an international organisation. If we transmit personal data to service providers or subsidiaries outside of the European Economic Area, we only do so if the third country has been deemed by the European Commission to have an adequate level of data protection or if another suitable data protection guarantee is in place (e.g. standard European contractual clauses).

4. Duration of storage

- 4.1 We will erase your personal data as soon as they are no longer required for the purposes described above. For the personal data you provide, this is normally the case when the business relationship with you ends. If the personal data are subject to duties of storage under tax or commercial law, we will store them for up to ten years depending on the duration of the duties of storage. Additionally, it might transpire that personal data are stored for the time necessary for the establishment, exercise or defence of legal claims (the statute of limitations is three or up to 30 years).

5. Rights of the data subject

- 5.1 Under Article 15 GDPR, you are entitled to request information about the personal data concerning you that we are processing. In particular, you can request information about the purposes for which the data are being processed, the categories of personal data, the categories of recipient to which your data are being or have been disclosed, the intended duration of storage, the existence of a right to rectify, erase, restrict processing or object, the existence of a right to file a complaint, the origins of your data if we did not collect them, as well as the existence of automated decision-making including profiling, along with detailed information about specific details of this process if it is indeed in place.
- 5.2 Under Article 16 GDPR, you can request the immediate rectification or completion of the personal data concerning you that we have stored. Under Article 17 GDPR, you are entitled to request the deletion of the personal data concerning you that we have stored as long as the processing of the data is not necessary for exercising the right of freedom of expression and information, for compliance with a legal obligation, for reasons of public interest or in order to establish, exercise and defend legal claims.
- 5.3 Under Article 18 GDPR, you are entitled to the restriction of the processing of your personal data if the accuracy of the data is contested by you, the processing is unlawful and you oppose the erasure of the data, we no longer need the data but you require them for the establishment, exercise or defence of legal claims or if you have objected to processing pursuant to Article 21 GDPR.
- 5.4 Under Article 20 GDPR, you are entitled to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format, and to request the transmission of the data to another controller.
- 5.5 Under Article 7 (3) GDPR, you are entitled to withdraw consent that you have provided to us at any time. This will result in us being unable to continue processing the data on the grounds of your consent in future.

Right to object

- 5.6 You are entitled to object to the processing of your personal data for the purposes of advertising without providing a reason. Where we process your data in order to serve legitimate interests, you can object to the processing on grounds relating to your particular situation. We will no longer process the personal data concerning you unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or the processing is for the establishment, exercise or defence of legal claims.

- 5.7 Additionally, under Article 77 GDPR, you are entitled to lodge a complaint regarding our processing of your personal data with a supervisory authority, for instance the Hamburg Commissioner for Data Protection and Freedom of Information, Klosterwall 6, 20095 Hamburg, tel.: 040 / 428544040, email: mailbox@datenschutz.hamburg.de.