

## **Data protection information for suppliers and other parties involved \***

(\*E.g. Service providers, contractors, bidders in tendering process, interested parties)

With the following information we would like to inform you how we process your personal data and which rights you are entitled to under the data protection law.

### **1. Who is responsible for data processing and who is your contact person?**

Contact responsible

Hettich Management Service GmbH  
Vahrenkampstraße 12 – 16  
D – 32278 Kirchlengern  
Tel.: + 49 5223 77 – 0  
[info@de.hettich.com](mailto:info@de.hettich.com)

You can contact our data protection officer at

Hettich Management Service GmbH  
Datenschutzbeauftragter  
Vahrenkampstraße 12 – 16  
D – 32278 Kirchlengern  
[protection@de.hettich.com](mailto:protection@de.hettich.com)

### **2. What sources and data do we use?**

We process personal data that we receive from our suppliers or other parties involved in the course of initiating, establishing and implementing a business relationship. In addition to this, we process personal data which is legitimately provided to us by credit agencies.

Following data is processed:

- Name and other contact data (address, email address, telephone number and other such data)
- Information about your financial situation (data about creditworthiness)
- Supplier history
- Supplier self-disclosure (RFI)
- Documentation data (e.g. minutes of meetings)

### **3. What do we process your data for (purpose of processing) and on what legal basis?**

We process personal data in accordance with the provisions of the EU Data Protection Ordinance (GDPR) and the Federal Data Protection Act (BDSG).

- a) For the fulfilment of contractual obligations (Art. 6 Para. 1 b) GDPR)

We process your personal data for the execution of our contracts with you, in particular in the context of our order processing and service utilisation. Furthermore, your personal data will be processed for the implementation of measures and activities within the framework of pre-contractual relationships.

b) For the fulfilment of legal obligations (Art. 6 Para. 1 c) GDPR)

We process your personal data if this is necessary to fulfil legal obligations (e.g. commercial and tax laws).

c) As a part of weighing of interests (Art. 6 Para. 1 f) GDPR)

If necessary, we process your data beyond the actual performance of the contract to protect the legitimate interests of us or of third parties.

This is done for the following purposes:

- for consultation and data exchange with credit agencies,
- for statistical evaluations or market analyses,
- for benchmarking,
- for the assertion of legal claims and defence in legal disputes which are not directly attributable to the contractual relationship,
- for internal or external investigations, e.g. security checks
- for the limited storage of your data, if deletion is not possible or only possible with disproportionate effort due to the special type of storage.

d) on the basis of your consent (Art. 6 Para. 1 a) GDPR)

A given consent can be revoked at any time. This also applies to the revocation of declarations of consent issued to us prior to the validity of the GDPR, i.e. before 25 May 2018. The revocation of consent is only effective for the future and does not affect the legality of the data processed until the revocation.

#### **4. Who receives your data?**

Within the Hettich Group, we pass on your personal data to companies and divisions that require this data to fulfil their contractual and legal obligations or to implement our legitimate interests.

For these purposes, recipients outside the Hettich Group may also receive your data, in particular

- Service providers and vicarious agents employed by us; these are in particular companies in the categories of transport, logistics, IT services, financial services, telecommunications and data disposal,

- Public authorities and institutions in the event of a legal or official obligation,
- Bodies and institutions on the basis of our legitimate interest or the legitimate interest of a third party (e.g. credit agencies, lawyers, courts, experts).

Other recipients of data may be those bodies for which you have given us your consent to the transfer of data.

## **5. Is your data transferred to a third-party country or an international organisation?**

Data is transferred to offices in countries outside the European Union or the European Economic Area (so-called "third-party countries") if it should be necessary to execute a contract with you, if it is required by law (e.g. tax reporting obligations), if it is in our legitimate interest or that of a third party or if you have given us your consent. The processing of your data in a third country can also take place in connection with the involvement of service providers as a part of order processing. If the EU Commission does not decide on an appropriate level of data protection for the country concerned, we guarantee that your rights and freedom are adequately protected and guaranteed in accordance with EU data protection regulations. We will be happy to provide you with detailed information on request.

## **6. How long do we store your data?**

We process and store your personal data as long as this is necessary for the fulfilment of our contractual and legal obligations. It should be noted that our business relationship may be a continuing obligation for years.

If the data are no longer required for the fulfilment of contractual or legal obligations, they are regularly deleted, unless their - temporary - further storage and processing is necessary for the following purposes:

- Fulfilment of commercial and tax retention periods resulting from the German Commercial Code (HGB) and the Tax Code (AO). The periods for storage and/or documentation specified there amount to up to 10 years beyond the end of the business relationship.
- Preservation of evidence within the framework of the legal statute of limitations, which, for example, according to §§ 195 ff BGB of the German Civil Code (BGB) may normally amount to three years, but in certain cases up to 30 years.

## **7. To what extent is there automated decision making (including profiling)?**

We do not use fully automated decision making according to Art. 22 GDPR. Should we use these procedures in individual cases, we will inform you separately, provided this is required by law.

## **8. What data protection rights do you have?**

The applicable data protection law grants you comprehensive rights of affected parties against the person responsible (see section 1 above) with regard to the processing of your personal data. Every person affected has the

- right to information about the personal data stored by us,
- right to correct, delete or limit the processing of your personal data,
- right to object to processing (see point 10 below),
- right to data transferability,
- right of appeal to a data protection supervisory authority.

## **9. Is there an obligation for you to provide data?**

As a part of our business relationship, you must provide the personal data that is required for the establishment, execution and termination of a business relationship and for the fulfilment of the associated contractual obligations or to the collection of which we are legally obliged. Without this information, we will usually not be able to enter into, execute and terminate a contract with you.

## **10. Information on your right of objection (Art. 21 GDPR)**

You have the right to object at any time to the processing of your data on the basis of Art. 6 para. 1 f) GDPR (data processing on the basis of a weighing of interests) or Art. 6 para. 1 e) GDPR (data processing in the public interest), if there are reasons for this arising from your particular situation. This also applies to profiling based on this provision within the meaning of Art. 4 No. 4 GDPR.

If you object, we will no longer process your personal data, unless we can prove compelling reasons worthy of protection for the processing, which outweigh your interests, rights and freedoms, or unless the processing serves to assert, exercise or defend legal claims.

The objection can be made without using any form and with the subject "objection" stating your name and your address to the address listed under point 1.