

Privacy Policy

We attribute highest priority to the protection of your personal data and we take doing so into account in each of our business processes. Inasmuch as you provide us with any personal information, such will be processed in accordance with the provisions of the EU General Data Protection Regulation (GDPR) as well as the statutory data protection regulations under the German Federal Data Protection Act (BDSG; Bundesdatenschutzgesetz).

The information provided in the following Privacy Policy is intended to give you a detailed overview of data processing, in particular the type, scope and purposes of the collection, processing and use of your personal data. Understood as personal data is all information relating to an identified or identifiable natural person. Moreover, you will also learn which rights you have relating to the processing of your personal data.

To make the text easier to read, use of the male personal pronoun was chosen, whereas the information nonetheless relates to all genders.

1. Scope of the Privacy Policy

1.1. Basic principle

This Privacy Policy applies to all interested parties, contractual and business partners of our company as well as any other persons, who come into contact with the performances or activities of our company in connection with such performances.

1.2. Supplementary application of special provisions for special performances

Additional data protection provisions that supplement this Privacy Policy may be provided with respect to certain performances and products from our company. This applies particularly to the use of our website. You may pull up and review this Privacy Policy in this regard from our website at <https://www.weber-online.com/>.

2. Contact Data of the Controller and the Data Protection Officer

2.1. Name and address of the Controller

The Controller as defined under the General Data Protection Regulation (GDPR) and other national data protection acts of the Member States and any other provisions regarding data protection is:

WEBER Schraubautomaten GmbH

Hans-Urmiller-Ring 56, 82515 Wolfratshausen, Germany
Phone: Phone: +49 (0)8171 406-0 | Email: info@weber-online.com
Website: <https://www.weber-online.com/>

2.2. Name and address of the Data Protection Officer

Our company has assigned a Data Protection Officer. You can reach the Data Protection Officer using the following contact data:

BNT GmbH

Hauptstr. 73a
68789 St. Leon-Rot
Germany

Stefan Becker
+49 (0)6227 3996930
info@bntgmbh.de
www.bntgmbh.de

3. Processing Your Personal Data

3.1. Processing your data

3.1.1. Description and scope of data processing

Inasmuch as you or the company that you work for (would like to) enter into a contractual relationship with us, we will collect and process your personal data within the scope of the contractual relationship to be established or rather that will then exist. This applies in particular to the following categories of personal data:

- Master data and professional contact data: in particular the title, first name, last name, address, phone number, email address, function and industry affiliation;
- If you are listed as the representative or contact partner of a company: Master data and professional data as described above as well as data on the manner of representation and your relationship to the company that you work for (company, division, department, responsibility, function);
- Contractual data, in particular data on the contract content, contract identification and contract history, persons concluding the contract, contract start and end, contract/transaction processing;
- Bank details;
- Where applicable, data about payment behavior and contractual behavior;
- Data from postal, electronic and phone communication between yourself and us as well as between you and third parties;
- Data about your business activities and any business partners;
- Any interests of the client as well as those of the authorized officer(s) and contact for marketing activities, in particular any invitations to events and other advertising information;
- Any other data in connection with establishing and implementing the contractual relationship.

The aforementioned personal data will be summarized below using the term **Data**.

3.1.2. Where does the data come from?

Generally, our company collects your data from you directly. In addition, we collect some of your data from our subsidiaries and sub-subsidiaries of the WEBER Group.

Lastly, we can also collect your data from publicly accessible sources, such as from websites of the company that you work for, from professional networks or for third-party business contacts, for example after a recommendation.

3.1.3. Purposes and legal basis for data processing

Our company collects and processes your data for a variety of purposes, in particular, however, in order to establish a new or implement an existing relationship with you or with the company that you work for. In detail:

Purposes:

- To initiate a contractual relationship and offer pre-contractual measures or fulfill contractual/statutory primary and secondary obligations arising from a contractual relationship with you or the company that you work for as an authorized officer or contact person;

- Invoicing and debt collection, billing and tax evaluation of company performances;
- Identity verification;
- Order-related correspondence with you and potentially with your authorized officers or representatives;
- Customer support.

Legal basis: Performance of the contract (Art. 6 (1.1b) GDPR) or **pursuing a legitimate interest** (Art. 6 (1.1f) GDPR), provided you are not a contractual partner yourself, but instead work for a company that is our (potential) contractual partner or (potential) contractual partner of a company within the WEBER Group; we assume that the legitimate interests of our company to store your personal data as the contact for your company that you work for takes priority over your interests. We have a legitimate interest in processing the concerns and queries you have addressed, the best possible customer result and in verifying your identity.

There is a need to regularly process personal data in order to meet the contractual and statutory obligations that arise from the contractual relationship that we initiate or conclude. Because of your obligation to cooperate, it is essential that you provide us with the personal data we request from you, because we will otherwise not be able to comply with our contractual and legal obligations. We cannot rule out that there will be disadvantages or implementation of the contractual relationship if data is not made available.

Purposes:

- Meeting obligations under public law, such as oversight and reporting obligations under tax law, archiving of data;
- To prevent fraud and money laundering, avert, combat and uncover the financing of terrorist activities and asset-endangering crimes, reconciling with European and international anti-terrorism lists;
- Disclosure of information as part of official/judicial measures for the purpose of gathering evidence, prosecuting crimes and enforcing civil law claims.

Legal basis: Compliance with legal obligations (Art. 6 (1.1c) GDPR) or for the purpose of pursuing legitimate interests (Art. 6 (1.1f) GDPR), because we have a legitimate interest in complying with international and national lists of sanctions, in documenting and verifying our compliance with statutory and contractual obligations and requirements as well as in asserting, exercising or defending against legal claims.

Purposes:

- Activities intended to control and optimize business processes as well as fulfilling the general due diligence obligations;
- Statistical evaluations for corporate management, cost recording and controlling;
- Asserting legal claims and defending against legal claims and legal disputes.

Legal basis: For the purpose of **pursuing legitimate interests** (Art. 6 (1.1f) GDPR) interests, because we have a legitimate interest in improving our (required corporate and legal) business processes and the improving our customer services as well as the asserting, exercising or defending against legal claims.

Purposes:

- Customer survey, creation and sending of personally tailored customer information and direct advertising.

Legal basis: Consent (Art. 6 (1.1a) GDPR) or for the purpose of pursuing **legitimate interests** (Art. 6 (1.1f) GDPR), because we have a legitimate interest in advertising our products and services to you as well as in improving our range of products and services.

4. Sharing Data with Third Parties

Within the company, and in some cases within our corporate Group, those offices receive access to your data that require them in order to meet their contractual and legal obligations and to pursue our legitimate interests. Moreover, data may be shared with third parties in the event that we are obligated to do so on the basis of legal provisions or an enforceable official or court order.

The service providers used and contracted by us as well (the so-called **processors**) may also receive the data for the aforementioned purposes. When rendering the specific services, we make use of processors in the following categories, who support us in processing our business processes on the basis of exact instructions from our company and in compliance with this Privacy Policy as well as with other appropriate confidentiality and security measures. Specifically, included herein are companies in the following categories: Call centers, service providers for sending postal or electronic communication, external data centers, maintenance of EDP/IT applications, archiving, document processing, call center services, compliance services, controlling, data screening for anti-money laundering purposes, data validation

Such third parties with whom we share your data, irrespective of the performances we provide, may include, in particular, third-party consultants (e.g. attorneys, tax consultants, certified public accountants), insurance providers, official authorities, courts, financial and collection service providers and credit agencies.

5. Sharing Your Data to a Third Country or an International Organization

We do not share the data you provided to us to a third country or international organization. If in individual cases you would like us to transmit the data you provided to us to a third country or international organization, we will only do so after have received your written consent, and after ensuring that an adequacy finding or suitable guarantees to maintain a high level of data protection is in place.

5.1.1. Storage period: option of objection and removal

Our company processes and stored your data only for as long as they are needed to meet contractual or legal obligations in particular. Once there is no longer a legal basis for processing your data, our company will delete the data or, if this is not possible, we will block any personal reference to you in accordance with data protection laws. In this respect, our company stores your data in accordance with legally applicable storage obligations, in particular in the following manner:

- Our company stores your data to the extent necessary for this purpose for as long as necessary to implement an existing or yet to be initiated contractual relationship with you or the company that you work for (however, only for as long as you work for this company) (Art. 6 (1.1b) GDPR).
- Our company stores your data to the extent necessary for this purpose in order to comply with the commercial and/or tax storage obligations that our company is subject to. In accordance with the statutory provisions, the period for meeting

all commercial and/or tax storage obligations is ten years for all documents used for determining a company's profit; for business correspondence (including emails) the storage period is six years. The legal basis for this is Art. 6 (1.1c) GDPR.

- According to the provisions of the German Civil Code (BGB), such limitation periods may be up to 30 years, whereas a limitation period is generally three years. For this reason, our company stores the contract documents as well as documents related to the contract in accordance with these limitation rules in order to be able to conduct any necessary (legal) disputes. The legal basis for this is Art. 6 (1.1f) GDPR.

6. Automated Decision-making on a Case-by-Case Basis, Including Profiling

No automated individual decision-making pursuant to Art. 22 GDBP is applied to process the data you provide (including profiling).

7. Your Rights

If your personal data is processed, then you are referred to as the data subject as defined under GDPR and are entitled to the following rights vis-à-vis the controller:

The data subject has the right to demand confirmation from the responsible party as to whether the personal data relating to him is being processed. If this is the case, the data subject has the **right to be informed** of this personal data and to receive the information specified in Art. 15 GDPR.

The data subject has the right to obtain from the controller without undue delay the **rectification** of inaccurate personal data concerning him and to have incomplete personal data **completed** (Art. 16 GDPR).

The data subject has the right to obtain from the controller the erasure of personal data concerning him without undue delay where any one of the grounds listed in Art. 17 GDPR applies, such as if data is no longer necessary in relation to the purposes for which it was collected (**Right to Erasure**).

The data subject has the right to obtain from the controller **restriction of processing** where one of the requirements listed in Art. 18 GDPR applies, such as if the data subject has objected to the processing of his data, for a period enabling the controller to verify the such objection.

The data subject shall have the right to **object** at any time, on grounds relating to his particular situation, to the processing of personal data concerning him. The controller shall no longer process the personal data, unless the controller can demonstrate compelling legitimate grounds for the processing thereof, which override the interests, rights and freedoms of the data subject, or unless the processing is intended for establishing, exercising or defending against legal claims (Art. 21 GDPR).

Without prejudice to any other administrative or judicial remedy, every data subject has **the right to lodge a complaint with a supervisory authority** if the data subject feels that the processing of your personal data is concerning him is in violation of GDPR (Art. 77 GDPR). The data subject may assert this right with a supervisory authority in the Member State of his habitual residence, place of work or place of the alleged infringement.

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