

## **Data protection information for visitors, business customers and interested parties in accordance with articles 13 and 14 GDPR**

The following information is intended to provide you with an overview of the personal data processed by us and to inform you about your rights resulting from data protection legislation.

### **1. Party responsible for data processing and contact data for the data protection officer**

Palas GmbH, Siemensallee 84, Building 7330, 76187 Karlsruhe, Germany, Tel.: +49 721 96213-0, Fax: +49 721 96213-33, e-mail: mail@palas.de

Data protection officer: Please send an e-mail to datenschutzanfragen@xdsb.de or to our postal address and mark it "FAO Data Protection Officer".

### **2. Where does the personal data come from?**

We process personal data we have obtained through business relationships (for example with customers or suppliers) or, for example, from inquiries sent to our company. We normally receive this data directly from the contracting party or from a person who submits an inquiry. Personal data can, however, also come from public sources (e.g. commercial register), provided it is legally permissible to process this data. Data may also have been sent to us legitimately by other companies. Depending on the particular case, we may also save our own information with this data (e.g. as part of an ongoing business relationship).

Depending on the particular case, this might relate to master data (e.g. name, address), contact data (e.g. telephone number, e-mail address), contract data or billing data for performance of our contractual obligations, and data required to process an inquiry, or in some cases also creditworthiness data, advertising data, sales data or other data in comparable categories.

### **3. For what purposes and on what legal basis is the personal data processed?**

When processing personal data, we comply with the applicable data protection legislation, in particular the General Data Protection Regulation (GDPR) and the Federal Data Protection Act (BDSG).

a.) As part of the performance of a contract or in order to take steps prior to entering into a contract (section 1, page 1, letter b) of article 6 of GDPR)

We process personal data primarily for the purpose of complying with contractual obligations and for providing the services associated with this, or within the framework of corresponding contract initiation (e.g. contract negotiations, tender preparation). Here, the specific purposes depend upon the relevant service or product to which the business relationship or contract initiation relates.

b.) For compliance with a legal obligation (section 1, page 1, letter c) of article 6 of GDPR)

There are many situations in which we are legally obliged to collect certain personal data from you and to share the data with or make it available to certain – generally public – departments or offices.

For example, we make available to the financial authorities for the purpose of tax calculations the personal data required for this in accordance with the pertinent legal requirements.

c.) For the balancing of legitimate interests (section 1, page 1, letter f) of article 6 of GPRD)

In addition, we also collect and process personal data for the purpose of pursuing our legitimate interests in the following situations:

- Processing general inquiries about our products and services
- Creditworthiness checks via corresponding credit agencies in order to assess default risks in business relationships
- Advertising or market research
- Assertion of legal claims and defense in legal disputes
- Ensuring IT operations and IT security
- Measures for building and plant safety (e.g. access authorization)
- Measures for improving our internal business processes and for product optimization.

d.) If the data subject has given consent (section 1, page 1, letter a) of article 6 of GPRD)

In some situations it is not absolutely necessary to process your personal data, and in such cases it is only permissible with your consent. In cases like this we will inform you about this situation, and we will particularly also inform you about the fact that any such consent is granted voluntarily and can be withdrawn at any time with effect for the future.

This is the case e.g. in

- some data processing situations via our website (refer to the data protection declaration on our website);
- some advertising situations (subject to consent to receive advertising, where required by law).

#### **4. Recipients of the personal data**

In general, the company will only grant access to your data to departments or offices that need to work with your data (“need-to-know” principle), i.e. who require access to this data in order to fulfill a contractual or legal obligation. This can also include service providers and vicarious agents who are operating on behalf of the company and/or who have been obliged to data confidentiality.

In certain situations we will transfer your data to

- public bodies (e.g. financial authorities) if a legal obligation to do so exists;
- other companies as part of the performance of the contractual relationship, for the balancing of legitimate interests or based on your consent. In individual cases, depending on the business relationship or order this can include, for example, companies co-involved in the delivery of our services, logistics partners, marketing service providers, credit agencies, banks, tax advisers or lawyers.

## **5. Will your personal data be transferred to a third country or to an international organization?**

We transfer personal data to other departments or offices outside of the European Union (third countries) if this is necessary in order to carry out a business relationship, it is required by law or you have given us your consent to do so.

In certain situations we use, or reserve the right to use, service providers who are either based in a third country or may on their part use service providers who are based in a third country. According to article 45 GDPR, the transfer of data to a third country may take place where the Commission has decided that the third country ensures an adequate level of protection. In the absence of such a decision, data transfer to a third country is permitted only if the controller or processor has provided appropriate safeguards (e.g. so-called standard data protection clauses issued by the European Commission), and on condition that enforceable data subject rights and effective legal remedies for data subjects are available (article 46 GDPR).

As a general rule, we only work with departments or offices in third countries that satisfy the criteria outlined above.

## **6. Storage period for the data**

We will process and store your personal data for as long as is required in order to fulfill our contractual and legal obligations. If the storage of personal data is no longer required in order to fulfill these obligations, the data will be deleted unless statutory retention requirements apply, such as legal retention requirements based on commercial, or tax law as implemented in the Tax Code or Commercial Code (6 or 10 years) or for the preservation of evidence within the framework of legal statutes of limitation.

## **7. Rights of the data subject**

You have the following rights toward us with regard to your personal data:

- Right to information
- Right to rectification or erasure
- Right to restriction of processing
- Right to object to processing
- Right to data portability

You also have the right to raise a complaint with a data protection supervisory body about the way in which we process your personal data.

But you also have the option of contacting our internal data protection officer (this can also be done confidentially).

If you have granted your consent to us (section 1, page 1, letter a) of article 6 GDPR), you have the right to withdraw this consent at any time with effect for the future.

Where we process your personal data on the basis of balancing legitimate interests (section 1, page 1, letter f) of article 6 GDPR), you can object to processing of the data. If you choose to exercise such an objection, we request that you explain the reasons why your personal data should not be processed in the manner in which we are processing it. If your objection is

justified, we will check the situation and either cease or modify the data processing or explain to you the compelling legitimate grounds on which we will continue processing the data. You can object to the processing of your personal data for advertising purposes at any time.

### **8.Obligation to provide data**

During the course of the performance of a contract or during a contract initiation, you will be required to provide the personal data required for the performance of the contract or in order to take steps prior to entering into a contract with the associated obligations. Furthermore, you will also be required to provide the personal data we are required by law to collect. If you do not make this data available, we will not be able to conclude or fulfill a contract with you. In cases where data is collected based on consent, your provision of data is voluntary and without obligation. However, if consent is not granted, we will not be able to offer any services that require consent-based data processing. You can withdraw your consent at any time with effect for the future, even after you have granted it.

### **9.Do we employ any automated decision-making processes or profiling?**

No.