

Information requirements regarding customers and suppliers

1 General

Hectronic GmbH takes the protection of your personal data very seriously. We process your personal data in accordance with the applicable legal data protection requirements for the purposes listed below. Personal data in the sense of this data protection information is all information that has a reference to your person.

1.1 Entity responsible for data processing

Hectronic GmbH
Allmendstrasse 15
79848 Bonndorf
Germany
Phone: +49 7703 9388 100
Fax (general) +49 7703 9388 60
E-mail address (general) info@hectronic.com

1.2 Data protection officer

We have appointed a data protection officer. You can reach him under:

DDSK Ltd.
- Data protection officer -
Dr.-Klein-Str. 29
88069 Tettngang
E-mail: datenschutz@hectronic.com

2 Processing frame

2.1 Source and origin of data collection

We process personal data that we have collected directly from you.

Insofar as this is necessary for the provision of our services, we also process personal data permissibly received from other companies or other third parties (e.g. credit agencies, address publishers). In addition, we process personal data that we have permissibly taken, received or acquired from publicly accessible sources (such as telephone directories, commercial and association registers, civil registers, debtor directories, land registers, the press, the Internet and other media) and may process.

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2.2 Data categories

Relevant personal data categories may include, in particular:

- Personal data (name, first name)
- Contact details (address, e-mail address, telephone number and similar data)
- Payment/coverage confirmation for bank and credit cards
- Customer history
- Video and image recording
- Usage data of the customer card
- Communication data (user details, content data, connection data as well as comparable data) within the scope of telephone conferences, video conferences and web meetings through the use of Internet-based communication tools (hereinafter: web meetings)

2.3 Purposes and legal bases of the data processed

We process personal data in accordance with the provisions of the General Data Protection Regulation (DSGVO), the Federal Data Protection Act (BDSG) and other applicable data protection regulations (details below). Which data is processed in detail and how it is used is largely determined by the respective subject matter of the contract. Further details or additions to the purposes of data processing can be found in the respective contractual documents, forms, a declaration of consent and/or other information provided to you (e.g. in the context of using our website or our terms and conditions).

2.3.1 Purposes for the fulfillment of a contract or pre-contractual measures (Art. 6 para. 1 b) DSGVO)

The processing of personal data is carried out for the execution of our contracts with you and the execution of your orders, as well as for the implementation of measures and activities in the context of pre-contractual relationships, e.g. with interested parties. This essentially includes: contract-related communication with you, the corresponding billing and related payment transactions, the verifiability of orders and other agreements as well as quality control through corresponding documentation, goodwill procedures, measures for the control and optimization of business processes as well as for the fulfillment of general due diligence obligations, management and control by affiliated companies; statistical evaluations for corporate management, cost recording and controlling, reporting, internal and external communication, emergency management, billing and tax assessment of operational services, risk management, assertion of legal claims and defense in legal disputes; ensuring IT security (including. The following areas are also included in the scope of duties: ensuring IT security (including system and plausibility tests) and general security, ensuring and exercising domiciliary rights (e.g., through access controls), ensuring the integrity, authenticity, and availability of data, preventing and investigating criminal offenses, and monitoring by supervisory bodies or control authorities (e.g., auditing).

2.3.2 Purposes within the scope of a legitimate interest of us or third parties (Art. 6 para. 1 f) DSGVO)

Beyond the actual performance of the contract or preliminary contract, we may process your data if it is necessary to protect legitimate interests of us or third parties, in particular for purposes of

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- advertising or market and opinion research, insofar as you have not objected to the use of your data;
- the further development of services and products as well as existing systems and processes;
- the enrichment of our data, including through the use or research of publicly available data; statistical evaluations or market analysis; benchmarking;
- the assertion of legal claims and defense in legal disputes which are not directly attributable to the contractual relationship;
- the restricted storage of the data, if deletion is not possible or only possible with disproportionate effort due to the special type of storage;
- the prevention and investigation of criminal offenses, insofar as not exclusively for the fulfillment of legal requirements;
- building and plant security (e.g. through access controls), insofar as this goes beyond the general duties of care;
- internal and external investigations and security reviews;
- securing and exercising domiciliary rights through appropriate measures (such as video surveillance), as well as securing evidence in the event of criminal acts and preventing them.
- the effective and resource-saving conduct of web meetings through the use of Internet-based communication tools.

2.3.3 Purposes within the scope of your consent (Art. 6 para. 1 a) DSGVO)

Processing of your personal data for certain purposes (e.g. use of your e-mail address for marketing purposes) may also be based on your consent. You can revoke this consent at any time. You will be informed separately about the purposes and the consequences of revoking or not granting consent in the corresponding text of the consent. In principle, the revocation of consent is only effective for the future. Processing that took place before the revocation is not affected by this and remains lawful.

2.3.4 Purposes for the fulfillment of legal requirements (Art. 6 para. 1 c) DSGVO) or in the public interest (Art. 6 para. 1 e) DSGVO)

Like everyone involved in business, we are subject to a wide range of legal obligations. Primarily, these are legal requirements (e.g., commercial and tax laws), but also, where applicable, regulatory or other official requirements. The purposes of processing may include the fulfillment of control and reporting obligations under tax law and the archiving of data for data protection and data security purposes as well as audits by tax and other authorities. In addition, the disclosure of personal data may be necessary in the context of official/court measures for the purposes of gathering evidence, criminal prosecution or enforcement of civil claims.

2.4 Consequences of not providing data

Within the framework of the business relationship, you must provide those personal data that are required for the establishment, execution and termination of the legal transaction and the fulfillment of the associated contractual obligations, or which we are required to collect by law. Without this data, we will not be able to carry out the legal transaction with you.

3 Recipient of the data

3.1 Within the EU/EEA

Within our company, those internal departments or organizational units receive your data that require it to fulfill our contractual and legal obligations or in the context of processing and implementing our legitimate interests.

Your data will only be passed on to external bodies if

- in connection with the execution of the contract;
- for the purpose of fulfilling legal requirements under which we are obliged to disclose, report or transfer data or if the transfer of data is in the public interest (see section 2.3.4);
- insofar as external service companies process data on our behalf as order processors or function transferees (e.g. data centers, support/maintenance of EDP/IT applications, archiving, document processing, call center services, compliance services, controlling, data validation or plausibility checks, data destruction, purchasing/procurement, customer administration, lettershops, marketing, media technology, research, risk controlling, billing, telephony, website management, auditing services, credit institutions, printing companies or companies for data disposal, courier services, logistics);
- on the basis of our legitimate interest or the legitimate interest of the third party within the scope of the aforementioned purposes (e.g. to authorities, credit agencies, debt collection, lawyers, courts, appraisers, subsidiaries, committees and supervisory bodies);
- if you have given us consent to transfer the data to third parties.

We will not pass on your data to third parties beyond this. Insofar as we commission service providers to process your data, they are subject to the same security standards as we are. In other cases, the recipients may only use the data for the purposes for which it was transmitted to them.

3.2 Outside the EU/EEA

Data is transferred to entities in countries outside the European Union (EU) or the European Economic Area (EEA), so-called third countries.

3.3 Receiver overview

The following recipients receive your data within the scope of the data processing described here:

Recipient: Hectronic Schweizg AG, Aarauerstr. 69, 5200 Brugg, Switzerland
 Hectronic Polska Sp.z o.o., ul. Bor 164, 42-200 Czestochowa, Poland
 Hectronic Vertriebs-u. Service GmbH, Paul-Reusch-Str. 10, 46045 Oberhausen, DE
 Hectronic France, 5, Boulevard de Créteil, 94100 Saint Maur des Fosses, France

Third country transfer: An adequacy decision of the European Commission is available for the transfer of data to a third country. The transfer is based on Art. 46 (1) DSGVO. The adequacy guarantee can be viewed [here](#).

4 Storage periods

We 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.

In addition, we are subject to various storage and documentation obligations, which result, among other things, from the German Commercial Code (HGB) and the German Fiscal Code (AO). The retention and documentation periods specified there are up to ten years at the end of the calendar year beyond the end of the business relationship or the pre-contractual legal relationship.

Furthermore, special statutory provisions may require a longer retention period, such as the preservation of evidence within the scope of statutory limitation provisions. According to Sections 195 et seq. of the German Civil Code (BGB), the regular limitation period is three years; however, limitation periods of up to 30 years may also be applicable.

If the data are no longer required for the fulfillment of contractual or legal obligations and rights, they are regularly deleted, unless their - temporary - further processing is necessary for the fulfillment of the purposes due to an overriding legitimate interest. Such an overriding legitimate interest also exists, for example, if deletion is not possible or only possible with disproportionate effort due to the special nature of the storage and processing for other purposes is precluded by appropriate technical and organizational measures.

5 Your rights

Under certain circumstances, you may exercise your data protection rights against us. Your requests regarding the exercise of your rights should, if possible, be addressed in writing or by e-mail to the address given above or directly in writing or by e-mail to our data protection officer.

- You have the right to receive **information from** us about your data stored by us according to the rules of Art. 15 DSGVO (if necessary with restrictions according to § 34 BDSG).
- Upon your request, we will **correct** the data stored about you in accordance with Art. 16 DSGVO if it is inaccurate or incorrect.
- If you wish, we will **delete** your data in accordance with the principles of Art. 17 DSGVO, provided that other legal regulations (e.g. statutory retention obligations or the restrictions under Section 35 BDSG) or an overriding interest on our part (e.g. for the defense of our rights and claims) do not prevent this.
- Taking into account the requirements of Art. 18 DSGVO, you may request us to **restrict the** processing of your data.
- If your personal data is processed on the basis of legitimate interests pursuant to Art. 6 (1) p. 1 lit. f) DSGVO or if this is necessary for the performance of a task processed in the public interest or in the exercise of official authority, you have the right to **object to the** processing of your personal data pursuant to Art. 21 DSGVO, insofar as there are grounds for doing so that arise from your particular situation or the objection is directed against direct advertising. In the latter case, you have a general right of objection, which will be implemented by us without specifying a particular situation.
- You also have the right to receive your data under the conditions of Art. 20 DSGVO in a structured, common and machine-readable format or to **transfer it to** a third party.
- In addition, you have the right to **revoke your** consent to the processing of personal data at any time with effect for the future.
- Furthermore, you have the **right to lodge a complaint** with a data protection supervisory authority (Art. 77 DSGVO). However, we recommend that you always first address a complaint to our data protection officer.

You can reach the supervisory authority responsible for us at:

The State Representative
for Data Protection and Freedom of Information Baden-Württemberg
P.O. Box 10 29 32, 70025 Stuttgart
Phone 0711 6155410
Fax 0711 61554115
poststelle@fdi.bwl.de