

Information requirements in accordance with Art. 13 GDPR

Protecting your personal data is very important to us. Therefore, we always handle your personal data (or “data” for short) in accordance with the relevant legal provisions. The purpose of this Privacy Policy is to comprehensively inform you, in accordance with Art. 13 of the European General Data Protection Regulation (EU GDPR), about how we process your data and all the claims and rights related to data protection to which you are entitled.

1. Who is responsible for data processing and who can you contact?

Controller:

HIGHVOLT Prüftechnik Dresden GmbH
Marie-Curie-Str. 10
01139 Dresden
+49 351 8425-600

Company data protection officer:

Christian Volkmer
Projekt 29 GmbH & Co. KG
Ostengasse 14
93047 Regensburg, Germany
E-Mail: anfragen@projekt29.de
Phone: +49 941 2986930

2. Which data is processed and what are the sources of this data?

We process the data that we receive from you as part of contract initiation and processing, based on your consent, or within the scope of your application for or employment at our company.

Personal data includes the following:

For **applicants** and **employees**, it includes first name and last name, address, contact information (e-mail address, phone number, fax), date of birth, information from your resume and work references, banking information, religious affiliation, and photographs.

For **customers** and **business partners**, it includes your legal representative, company, trade registry number, VAT ID number, company registration number, address, contact information for your contact person (first and last name, e-mail address, telephone number, fax, department), and banking information.

For **visitors** to our company, it includes first name and last name, company contact information, contact person in the company, and license plate number.

For **contest participants**, it includes first and last name and e-mail address.

In addition, we also process the following personal data:

- Information on the type and content of contract data, order data, sales and document data, customer and supplier history, and consulting documents
- Advertising and sales information
- Information from your electronic correspondence with us (such as IP address, login data)
- Other data that we have obtained from you as part of our business relationship (such as in customer meetings)
- Data that we generate ourselves from master data/contact data and other data, such as through customer needs analyses and customer potential analyses
- The documentation of your declaration of consent to receive newsletters, for example
- Photographs taken at events

3. For which purposes and on what legal basis is personal data processed?

We process your data in accordance with the provisions of the General Data Protection Regulation (GDPR) and the 2018 German Federal Data Protection Act as amended:

- **To fulfill (pre-)contractual obligations (Art. 6(1)(b) GDPR):**
In order to process your contract, your data is processed online or at one of our branches; in order to process your employment contract, your data is processed at our company. This data is processed in particular at the start of a business relationship or when entering into a contract with you.
- **To meet legal obligations (Art. 6(1)(c) GDPR):**
We are required to process your data for the purpose of fulfilling various legal obligations, for example from the German Commercial Code or the tax code.
- **To protect legitimate interests (Art. 6(1)(f) GDPR):**
In an effort to balance interests, data processing can occur beyond actual fulfillment of the contract in order to protect our own legitimate interests or those of third parties. Data processing in an effort to protect legitimate interests can occur, for example, in the following cases:
 - Advertising or marketing (see 4)
 - Measures for business management and further development of products and services
 - Maintaining a company-wide customer database to improve customer service
As part of legal proceedings
 - To send non-sales promotional information and press releases
- **Within the scope of your consent (Art. 6(1)(a) GDPR):**
If you have given us consent to process your data, for example to receive our newsletter, publish photos, take part in competitions, etc.

4. Processing personal data for advertising purposes

You can object to use of your personal data for any advertising purposes or for specific advertising measures without incurring any costs other than the data transmission costs in accordance with the base rates.

In accordance with the legal requirements of Section 7(3) of the German Act Against Unfair Competition, we are authorized to use the e-mail address that you specified upon signing the contract for direct advertising of other similar products or services that we offer. You will receive these product recommendations from us regardless of whether you have subscribed to a newsletter.

If you do not want to receive these recommendations from us by e-mail, you can object to the use of your e-mail address for this purpose at any time without incurring any costs beyond the usual fees associated with data transmission services. To do so, simply notify us in writing. Every e-mail we send also includes an unsubscribe link.

5. Who will receive my data?

If we use a service provider for order processing, we are still responsible for protecting your data. All order processors are contractually obligated to keep your data confidential and to process it only for the purpose of the provision of services. The order processors that we commission receive your data if they need it to carry out their respective service. These include IT service providers that we require for the operation and security of our IT systems, or advertising and address publishers for our own advertising campaigns.

Your data is processed in our customer database. The customer database helps us increase the data quality of the available customer data (removing duplicates, moved/deceased indicator, address correction), and lets users add data to the database from public sources.

This data is provided to affiliated companies to the extent required for contract processing. Customer data is stored separately for each company, and our parent company functions as a provider for the individual participating companies.

Public authorities and courts, as well as external auditors, are authorized to receive your data if they have a legal obligation to do so or as part of an assertion of legal rights.

Moreover, insurers, banks, credit agencies and service providers could be recipients of your data for the purpose of contract initiation and fulfillment.

6. How long will my data be stored?

We will continue to process your data until the end of the business relationship or the expiration of the applicable legal retention periods (as specified, for example, in the German Commercial Code, the Fiscal Code of Germany, or the German Working Hours Act); moreover, we will also keep your data until the point at which any legal disputes for which the data is required as evidence have been resolved.

7. Is personal data sent to any third countries?

In general, we do not send any data to third countries. Data is transmitted to third countries only in individual cases on the basis of an adequacy decision adopted by the European Commission, standard contractual clauses, suitable warranties, or your express consent.

8. What data protection rights do I have?

You have the right to receive information about your stored data, the right to rectification, erasure, or restriction of the processing of your data, the right to object to processing, the right to data portability, and the right to lodge a complaint in accordance with the provisions of data protection law at all times.

Right to information:

You can request information from us about whether and to what extent we process your data.

Right to rectification:

If we process data about you that is incomplete or incorrect, you can request that we rectify or complete it at any time.

Right to erasure:

You can request that we erase your data, provided that we are processing it improperly or the processing interferes disproportionately with your legitimate protection interests. Please note that there can be reasons why it cannot be deleted immediately, such as if there is a legally regulated retention period.

Independently of the assertion of your right to erasure, we will delete your data immediately and completely insofar as we are not prevented from doing so by any legally mandated or statutory retention period.

Right to restriction of processing:

You can request that we restrict the processing of your data if

- You dispute the accuracy of the data, for a period of time that allows us to verify the accuracy of the data
- The processing of the data is unlawful, but you decline erasure and instead demand restriction of data use
- We no longer need the data for the intended purpose, but you still need this data to assert or defend against legal claims
- You have lodged an objection to the processing of the data

Right to data portability:

You can demand that we provide you with the data you have provided to us in a structured, commonly used, and machine-readable format, and that you can transmit this data to another responsible party without interference from us, insofar as

- We process this data based on consent granted and retractable by you or to fulfill a contract between us
- This processing takes place using automated processes

Where technically feasible, you can request that we transmit your data directly to another responsible body.

Right to objection:

If we process your data out of a legitimate interest, you can object to and revoke your consent for this data processing at any time; this would then apply to any profiling based on these provisions. We will then no longer process your data unless we can prove the existence of binding reasons for processing

that supersede your interests, rights, and freedoms, or we can prove that the processing serves the purpose of asserting, exercising, or defending against legal claims. You can revoke your consent to the processing of your data for the purpose of direct marketing at any time without specifying reasons.

Right to lodge a complaint:

If you believe that we are infringing against German or European data protection laws by processing your data, we ask that you contact us to clear up any questions. You also have the right to contact the appropriate supervisory body, which is the respective state office of the data protection commissioner. To lodge a claim against us on the basis of one of the aforementioned rights, contact our data protection officer. In case of doubt, we may request additional information to confirm your identity.

9. Am I obligated to provide data?

The processing of your data is necessary for entering into a contract or fulfilling the contract which you have entered into with us. As a rule, if you do not make this data available, we will be forced to decline to enter into a contract or terminate an existing contract because we will no longer be able to fulfill it. However, you are not obligated to consent to processing of data that is neither relevant for contract fulfillment nor legally required.