

## **Data Protection Information** **Schaltbau GmbH**

In connection with our business activities we, Schaltbau GmbH, process personal data of various persons. These in particular include

- our job applicants,
- our potential business partners (leads), our existing business partners and their employees,
- users of our online services.

The protection of personal data is important to us. We process personal data only in accordance with the applicable data protection requirements, in particular the General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (*Bundesdatenschutzgesetz* - BDSG).

In **Section A** of this Data Protection Information we provide you with information about the **controller** responsible for the processing of your personal data and the **data protection officer**.

In **Sections B to D** we also provide you with information about the **processing of your personal data**.

In **Section E** we also provide you with information about **your rights regarding the processing of your personal data**.

The **technical data protection terms used in this Data Protection Information** have the meanings used in the General Data Protection Regulation. You will find more detailed information on this in **Section F**.

## TABLE OF CONTENTS

<b>A.</b>	<b>Information on the controller .....</b>	<b>3</b>
<b>I.</b>	<b>Identity and contact details of the controller .....</b>	<b>3</b>
<b>II.</b>	<b>Contact details of the controller’s data protection officer .....</b>	<b>3</b>
<b>B.</b>	<b>Information on the processing of personal data of our job applicants.....</b>	<b>4</b>
<b>I.</b>	<b>Details on the personal data which are processed .....</b>	<b>4</b>
<b>II.</b>	<b>Details on the processing of the personal data .....</b>	<b>7</b>
<b>III.</b>	<b>Details on the recipients of personal data and the transfer of personal data to third countries and/or international organisations .....</b>	<b>8</b>
<b>C.</b>	<b>Information on the processing of personal data of potential business partners (leads), our existing business partners and their employees .....</b>	<b>9</b>
<b>I.</b>	<b>Details on personal data which are processed .....</b>	<b>10</b>
<b>II.</b>	<b>Details on the processing of personal data .....</b>	<b>18</b>
<b>III.</b>	<b>Details on the recipients of personal data and the transfer of personal data to third countries and/or international organisations .....</b>	<b>24</b>
<b>D.</b>	<b>Information on the processing of personal data of the users of our online services.....</b>	<b>26</b>
<b>E.</b>	<b>Information on the rights of data subjects.....</b>	<b>26</b>
<b>I.</b>	<b>Right of access .....</b>	<b>27</b>
<b>II.</b>	<b>Right to rectification .....</b>	<b>27</b>
<b>III.</b>	<b>Right to erasure (“right to be forgotten”) .....</b>	<b>28</b>
<b>IV.</b>	<b>Right to restriction of processing.....</b>	<b>28</b>
<b>V.</b>	<b>Right to data portability .....</b>	<b>29</b>
<b>VI.</b>	<b>Right to object .....</b>	<b>29</b>
<b>VII.</b>	<b>Right to withdraw consent .....</b>	<b>30</b>
<b>VIII.</b>	<b>Right to lodge a complaint with a supervisory authority .....</b>	<b>31</b>
<b>F.</b>	<b>Information about the technical terms of the General Data Protection Regulation used in this Data Protection Information.....</b>	<b>32</b>
<b>G.</b>	<b>Effective date and changes to this Data Protection Information.....</b>	<b>34</b>

**A. Information on the controller**

**I. Contact of the company**

Schaltbau GmbH  
Hollerithstraße 5, 81829 Munich, Germany  
dataprotection@schaltbau.de

**II. Contact details of the company's data protection officer**

Ditis Systeme, Niederlassung der JMV GmbH & Co. KG  
Stefan Hackenberg  
Lise-Meitner-Straße 15  
Science-Park II  
89081 Ulm, Germany  
Stefan.Hackenberg@ditis.de

## B. Information on the processing of personal data of our job applicants

In connection with our business activities, we process the personal data of persons applying for jobs with us.

We process data of our job applications for the following purposes:

- Conducting the application process, in particular reviewing applications, contacting the applicant and conducting interviews to evaluate and select suitable applicants,
- In the event that the applicant is not hired, for considering the applicant for future job offers, in particular storing data collected in the course of the application process, evaluating suitability for future job offers and to contact the applicant to initiate an application process,
- Storage for a transitional period for evidence purposes for the possible establishment, exercise or defence of legal claims.

You receive more detailed information on this below:

### I. Details on the personal data which are processed

Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data	Storage duration
Master data.	Name, date of birth, nationality, place of birth, country of birth, marital status.	Applicants or recruitment agencies instructed to act on behalf of applicants.	Provision is not a statutory or contractual requirement, or a requirement necessary to enter into a contract. There is no obligation to provide the data.  However, if the data is not provided, it will not be possible to conduct the application process and, if applicable, to hire an applicant.	If an applicant is hired, the data will be entered in the personnel file. Information on the storage duration is provided in the information on the processing of the personal data of our employees.  If the relevant applicant consents to this, in the event that the applicant is not hired, the data will be stored for a period of 12 months (or until a possible prior revocation of consent) after completion of

				<p>the application procedure for considering the applicant for future job offers.</p> <p>Otherwise the data will be stored only for evidence purposes for the possible establishment, exercise and defence of legal claims for a period of six months after completion of the application process.</p>
Contact data.	Private address, e-mail address, telephone number.	Applicants.	<p>Provision is not a statutory or contractual requirement, or a requirement necessary to enter into a contract. There is no obligation to provide the data.</p> <p>However, If the data is not provided, it will not be possible to conduct the application process and, if applicable, to hire an applicant.</p>	<p>If an applicant is hired, the data will be entered in the personnel file. Information on the storage duration is provided in the information on the processing of the personal data of our employees.</p> <p>If the relevant applicant consents to this, in the event that the applicant is not hired, the data will be stored for a period of 12 months (or until a possible prior revocation of consent) after completion of the application procedure for considering the applicant for future job offers.</p> <p>Otherwise the data will be stored only for evidence purposes for the possible establishment, exercise and</p>

				defence of legal claims for a period of six months after completion of the application process.
Application data.	<p>Content of application documents, in particular photo, CV and certificates.</p> <p>Contents of written correspondence (including electronic correspondence) relating to the application.</p>	Applicants.	<p>Provision is not a statutory or contractual requirement, or a requirement necessary to enter into a contract. There is no obligation to provide the data.</p> <p>However, If the data is not provided, it will not be possible to conduct the application process and, if applicable, to hire an applicant..</p>	<p>If an applicant is hired, the data will be entered in the personnel file. Information on the storage duration is provided in the information on the processing of the personal data of our employees.</p> <p>If the relevant applicant consents to this, in the event that the applicant is not hired, the data will be stored for a period of 12 months (or until a possible prior revocation of consent) after completion of the application procedure for considering the applicant for future job offers.</p>
	<p>Consent to the storage of personal data collected during the application process for the purpose of considering the applicant for future job offers in the event that the applicant is not hired.</p>	Applicants.	<p>Provision is not a statutory or contractual requirement, or a requirement necessary to enter into a contract. There is no obligation to provide the data.</p> <p>However, If the data is not provided, we may consider your application only for the position for which you have applied and, in the event that you are not hired, not for any future positions.</p>	<p>Otherwise the data will be stored only for evidence purposes for the possible establishment, exercise and defence of legal claims for a period of six months after completion of the application process.</p>
	<p>Contents of evaluation notes, perceptions from interviews, feedback and evaluations,</p> <p>documentation of any consents given by the applicant to the storage of personal data collected during the application process for</p>	Generated by us.	-	

	the consideration of the applicant for future job offers in the event that the applicant is not hired, in particular the time of consent and any revocation.			
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## II. Details on the processing of the personal data

Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient
Conducting the application process, in particular reviewing applications, contacting the applicant and conducting interviews to evaluate and select suitable applicants.	Master data, contact data, application data.	No automated decision-making takes place.	Decision on the establishment of an employment relationship (Article 88 paragraph 1 of the General Data Protection Regulation, sec. 26(1) of the German Federal Data Protection Act).  Taking steps prior to entering into a contract (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).	HR-department,  The department responsible for the position to be filled,  Works councils,  Representative for Disabled Persons.
In the event that the applicant is not hired:  Considering the applicant for future job offers, in particular storing data collected in the course of the application process, evaluating suitability for future job offers and to contact the	Master data, contact data, application data.	No automated decision-making takes place.	Consent (point (a) of Article 6 paragraph 1 of the General Data Protection Regulation).	-

applicant to initiate an application process.				
Storage for evidence purposes for the possible establishment, exercise or defence of legal claims.	Master data, contact data, application data.	No automated decision-making takes place.	The legal basis for the storage for evidence purposes is a balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the establishment, exercise and defence of legal claims.	HR-department.

**III. Details on the recipients of personal data and the transfer of personal data to third countries and/or international organisations**

<b>Recipient</b>	<b>Recipient's role</b>	<b>Recipient's location</b>	<b>Adequacy decision or appropriate or suitable safeguards for transfers to third countries and/or international organisations</b>
HR-department,  The department responsible for the position to be filled,  Works councils,  Representative for Disabled Persons.	Part of the controller.	EU.	-



## **C. Information on the processing of personal data of potential business partners (leads), our existing business partners and their employees**

In connection with our business activities, we process the personal data of potential business partners (leads), our existing business partners and their employees.

Business partners are all natural or legal persons with which we maintain business relations. These in particular include our customers, suppliers and distribution partners. Data of our business partners can be personal data if the business partners are natural persons. Personal data are also data concerning employees of our business partners.

We process data of potential business partners (leads), our existing business partners and their employees for the following purposes:

- Determination of potential business partners (leads) and initiation of business relationships,
- identification of our business partners,
- taking steps prior to entering into a contract, including pre-contractual communication and preparation of offers and cost estimates,
- assessing our customer's credit-worthiness as well as setting and monitoring credit limits for our customers,
- performance of contracts with our business partners, including invoicing and payment processing,
- proper accounting and document retention in order to comply with statutory, in particular commercial and tax law document retention obligations, as well as for evidence purposes for the establishment, exercise and defence of legal claims,
- establishment, exercise or defence of legal claims, including cooperation with external lawyers,
- cooperation with external tax advisors and/or public accountants in order to comply with statutory obligations,
- cooperation with supervisory authorities, courts and other public bodies in order to comply with statutory obligations,
- business relationship management, including establishing contact to our business partners and maintaining the relationship with our business partners and adapting our services to the needs and wishes of our business partners.

You receive more detailed information on this below:

## I. Details on personal data which are processed

Categories of personal data processed	Personal data included in the categories	Sources of data	Obligation to provide the data	Storage duration
Lead data.	Company name, industry, name function and business contact details (address, e-mail address, telephone number) of lead.	Leads.	Provision is not a statutory or contractual requirement, or a requirement necessary to enter into a contract. There is no obligation to provide the data.  However, if the data is not provided, it may not be possible to initiate a business relationship .	We store the data until the purpose of processing these data specified below has been achieved.  We store these data for 5 years and also if any statutory, in particular commercial and tax law, document retention obligations exists. Depending on the document type, document retention requirements under commercial or tax law can be between six and ten years (sec. 147 German Tax Code ( <i>Abgabenordnung – AO</i> ), sec. § 257 German Commercial Code ( <i>Handelsgesetzbuch – HGB</i> )).
		(Existing) business partners, other third parties, publicly accessible sources (e.g. websites, trade directories).	-	
Master data.	Company name, register number, VAT ID number, Business Identification Number, industry of our business partners.	Business partners.	Provision is not a statutory or contractual requirement, or a requirement necessary to enter into a contract. There is no obligation to provide the data.  However, if the data is not provided, it may not be possible to enter into or fulfil a contract.	We store the data until the purpose of processing these data specified below has been achieved.  We also store these data if any statutory, in particular commercial and tax law, document retention obligations exists. Depending

				on the document type, document retention requirements under commercial or tax law can be between six and ten years (sec. 147 German Tax Code ( <i>Abgabenordnung</i> – AO), sec. § 257 German Commercial Code ( <i>Handelsgesetzbuch</i> – HGB).
	Customer number(s), supplier number(s) or our business partners.	Generated by us.	-	<p>We store the data until the purpose of processing these data specified below has been achieved.</p> <p>We also store these data if any statutory, in particular commercial and tax law document retention obligations exists. Depending on the document type, document retention requirements under commercial or tax law can be between six and ten years (sec. 147 German Tax Code (<i>Abgabenordnung</i> – AO), sec. § 257 German Commercial Code (<i>Handelsgesetzbuch</i> – HGB).</p>
Identification data.	Information on the economic beneficiary of our business partners.	Business partners.	Provision is not a statutory or contractual requirement, or a requirement necessary to enter	We store the data until the purpose of processing these data specified below has been achieved.

			<p>into a contract. There is no obligation to provide the data.</p> <p>However, if the data is not provided, it may not be possible to enter into or fulfil a contract.</p>	<p>We also store these data if any statutory, in particular commercial and tax law document retention obligations exists. Depending on the document type, document retention requirements under commercial or tax law can be between six and ten years (sec. 147 German Tax Code (<i>Abgabenordnung – AO</i>), sec. § 257 German Commercial Code (<i>Handelsgesetzbuch – HGB</i>)).</p>
Contact data.	Name, function and business contact data (address, e-mail address, telephone number, fax number) of the contact persons at our business partners.	Business partners.	<p>Provision is not a statutory or contractual requirement, or a requirement necessary to enter into a contract. There is no obligation to provide the data.</p> <p>However, if the data is not provided, it may not be possible to enter into or fulfil a contract.</p>	<p>We store the data until the purpose of processing these data specified below has been achieved.</p> <p>We also store these data if any statutory, in particular commercial and tax law document retention obligations exists. Depending on the document type, document retention requirements under commercial or tax law can be between six and ten years (sec. 147 German Tax Code (<i>Abgabenordnung – AO</i>), sec. § 257 German Commercial Code (<i>Handelsgesetzbuch – HGB</i>)).</p>

Bank account data.	Account holder, bank, IBAN, BIC of our business partners.	Business partners.	<p>Provision is not a statutory or contractual requirement, or a requirement necessary to enter into a contract. There is no obligation to provide the data.</p> <p>However, if the data is not provided, it may not be possible to enter into or fulfil a contract.</p>	<p>We store the data until the purpose of processing these data specified below has been achieved.</p> <p>We also store these data if any statutory, in particular commercial and tax law document retention obligations exists. Depending on the document type, document retention requirements under commercial or tax law can be between six and ten years (sec. 147 German Tax Code (<i>Abgabenordnung</i> – AO), sec. § 257 German Commercial Code (<i>Handelsgesetzbuch</i> – HGB)).</p>
Communication data.	Content of business communication with our business partners, in particular by post, e-mail, telephone, fax.	Business partners.	<p>Provision is not a statutory or contractual requirement, or a requirement necessary to enter into a contract. There is no obligation to provide the data.</p> <p>However, if the data is not provided, it may not be possible to enter into or fulfil a contract.</p>	<p>We store the data until the purpose of processing these data specified below has been achieved.</p> <p>We also store these data if any statutory, in particular commercial and tax law document retention obligations exists. Depending on the document type, document retention requirements under commercial or tax law can be between six and ten years (sec. 147 German Tax Code</p>
	Circumstances of business communication with our business partners, in particular those involved, time and duration.	Generated by us.	-	

				( <i>Abgabenordnung – AO</i> ), sec. § 257 German Commercial Code ( <i>Handelsgesetzbuch – HGB</i> ).
Credit assessment data	Information on the credit-worthiness of our customers. These include in particular credit scores provided by credit agencies and information on the due payment of debts, generated by us.	Credit agencies, generated by us.	-	<p>We store the data until the purpose of processing these data specified below has been achieved.</p> <p>We also store these data if any statutory, in particular commercial and tax law document retention obligations exists. Depending on the document type, document retention requirements under commercial or tax law can be between six and ten years (sec. 147 German Tax Code (<i>Abgabenordnung – AO</i>), sec. § 257 German Commercial Code (<i>Handelsgesetzbuch – HGB</i>)).</p>
Contract data.	Information we receive from our business partners in order to take steps prior to entering into a contract and/or to fulfil contracts with our business partners.	Business partners.	<p>Provision is not a statutory or contractual requirement, or a requirement necessary to enter into a contract. There is no obligation to provide the data.</p> <p>However, if the data is not provided, it may not be possible to enter into or fulfil a contract.</p>	<p>We store the data until the purpose of processing these data specified below has been achieved.</p> <p>We also store these data if any statutory, in particular commercial and tax law document retention</p>

	Data from written (including electronic) contract documents that we receive from our business partners.	Business partners.	Provision is not a statutory or contractual requirement, or a requirement necessary to enter into a contract. There is no obligation to provide the data.  However, if the data is not provided, it may not be possible to enter into or fulfil a contract.	obligations exists. Depending on the document type, document retention requirements under commercial or tax law can be between six and ten years (sec. 147 German Tax Code ( <i>Abgabenordnung</i> – AO), sec. § 257 German Commercial Code ( <i>Handelsgesetzbuch</i> – HGB)).
	Information that we may receive from third parties in order to take pre-contractual steps and/or to fulfil contracts with our business partners.	Third parties.	-	
	Data from written (including electronic) contract documents that we create.	Generated by us.	-	
Invoice data.	Data from invoices and payment reminders that we receive from our business partners, in particular date, invoice items and invoice amounts.	Business partners.	Provision is not a statutory or contractual requirement, or a requirement necessary to enter into a contract. There is no obligation to provide the data.  However, if the data is not provided, invoicing may not be possible.	We store the data until the purpose of processing these data specified below has been achieved.  We also store these data if any statutory, in particular commercial and tax law document retention obligations exists. Depending on the document type, document retention requirements under commercial or tax law can be between six and ten years (sec. 147 German Tax Code ( <i>Abgabenordnung</i> – AO), sec. § 257 German Commercial
	Data that we generate automatically for invoicing purposes, in particular the content of internal time records and activity reports.	Generated by us.	-	
	Data from invoices and payment reminders that we create, in	Generated by us.	-	

	particular data, invoice items and invoice amounts.			Code ( <i>Handelsgesetzbuch</i> – HGB).
Payment data.	Data concerning payment processes, in particular data and payment amounts.	Generated by us.	-	<p>We store the data until the purpose of processing these data specified below has been achieved.</p> <p>We also store these data if any statutory, in particular commercial and tax law document retention obligations exists. Depending on the document type, document retention requirements under commercial or tax law can be between six and ten years (sec. 147 German Tax Code (<i>Abgabenordnung</i> – AO), sec. § 257 German Commercial Code (<i>Handelsgesetzbuch</i> – HGB).</p>
Record data.	Data from records concerning the business content of appointments and meetings with our business partners that we prepare for the maintenance of the business relationship.	Generated by us.	-	<p>We store the data until the purpose of processing these data specified below has been achieved.</p> <p>We also store these data if any statutory, in particular commercial and tax law document retention obligations exists. Depending on the document type, document retention requirements under</p>



				commercial or tax law can be between six and ten years (sec. 147 German Tax Code ( <i>Abgabenordnung – AO</i> ), sec. § 257 German Commercial Code ( <i>Handelsgesetzbuch – HGB</i> ).
Analysis data.	Data from analyses of the business structure of the companies of our business partners that we prepare for the strategic alignment of our business relationships.	Generated by us.	-	<p>We store the data until the purpose of processing these data specified below has been achieved.</p> <p>We also store these data if any statutory, in particular commercial and tax law document retention obligations exists. Depending on the document type, document retention requirements under commercial or tax law can be between six and ten years (sec. 147 German Tax Code (<i>Abgabenordnung – AO</i>), sec. § 257 German Commercial Code (<i>Handelsgesetzbuch – HGB</i>).</p>
Survey data.	Responses to our surveys for the voluntary assessment of the business relationship from the business partner's perspective.	Business partners.	<p>Provision is not a statutory or contractual requirement, or a requirement necessary to enter into a contract. There is no obligation to provide the data.</p> <p>If the data is not provided, we will not be able to take any survey</p>	We store the data until the purpose of processing these data specified below has been achieved.

			results of this business partner into account. This does not otherwise affect the business relationship.	
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## II. Details on the processing of personal data

Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient
<p>Determination of potential business partners (leads) and initiation of business relationships, including establishing initial contact with the objective of establishing a business relationship.</p> <p>Depending on the kind of business relationship sought, the determination of potential business partners and the establishment of initial contact can in the individual case require cooperation with other companies of our corporate group or dependent branches of Schaltbau GmbH.</p>	Lead data.	No automated decision-making takes place.	<p>The legal basis for the determination of potential business partners and the initiation of business relationships is in principle a balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the establishment of new business relationships.</p> <p>The legal basis for establishing contact with leads can, depending on the circumstances of the relevant individual case, in particular the type of initial contact with the relevant lead, either be consent (point (a) of Article 6 paragraph 1 of the General Data Protection Regulation), the taking of steps prior to entering into a contract at the request of the data subject (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation) or a balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is</p>	Other companies of our corporate group, dependent branches of Schaltbau GmbH.

			the establishment of new business relationships.	
Identification of our business partners.	Master data, identification data.	No automated decision-making takes place.	Compliance with a legal obligation, in particular the German Anti-Money Laundering Act ( <i>Geldwäschebekämpfungsgesetz – GwG</i> ) (point (c) of Article 6 paragraph 1 of the General Data Protection Regulation),  balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is knowing who our business partners are.	-
Taking steps prior to entering into a contract, including pre-contractual communication and preparation of offers and cost estimates.  Depending on the services provided, cooperation with other companies in our corporate group or companies outside our corporate group may take place in individual cases for the taking of steps prior to entering into a contract.	Master data, contact data, communication data, contract data.	No automated decision-making takes place.	If the data subject is our (potential) business partner, the legal basis is taking steps prior to entering into a contract at the request of the data subject (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).  If the data subject is not our (potential) business partner, the legal basis is a balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is taking steps prior to entering into a contract at the request of our (potential) business partner.	Other companies of our corporate group,  dependent branches of Schaltbau GmbH,  shipping services providers.
Prior to entering into a contract with our customers, we assess our customer's credit-worthiness and set credit limits for our customers. Until full payment we	Master data, contact data,	We do not perform automated decision-making.	The legal basis is a balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation).	Other companies of our corporate group,

<p>regularly monitor the credit-worthiness and credit limits for our customers.</p> <p>Depending on the services provided, cooperation with other companies in our corporate group or dependent branches of Schaltbau GmbH may take place in individual cases for assessing our customer's credit-worthiness as well as setting and monitoring credit limits for our customers.</p>	<p>communication data, credit assessment data, contract data.</p>	<p>Information on any automated decision-making performed by credit agencies may be provided by the relevant credit agency.</p>	<p>Our legitimate interest is safeguarding the collection of receivables.</p>	<p>dependent branches of Schaltbau GmbH, credit agencies.</p>
<p>Performance of contracts with our business partners, including pre-contractual communication, exchange of services, invoicing and payment processing.</p> <p>Depending on the services provided cooperation with other companies in our corporate group or dependent branches of Schaltbau GmbH may be required.</p>	<p>Master data, contact data, bank account data, communication data, contract data, invoice data, payment data.</p>	<p>No automated decision-making takes place.</p>	<p>If the data subject is our business partner, the legal basis is the performance of a contract to which the subject is party (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).</p> <p>If the data subject is not our business partner, the legal basis is a balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the performance of the contract with our business partner.</p>	<p>Other companies of our corporate group, dependent branches of Schaltbau GmbH, shipping services providers.</p>
<p>Proper accounting and document retention in order to comply with contractual and statutory, in particular commercial and tax law document retention obligations.</p>	<p>Master data, identification data contact data, bank account data, communication data,</p>	<p>No automated decision-making takes place.</p>	<p>Compliance with a legal obligation (point (c) of Article 6 paragraph 1 of the General Data Protection Regulation), in particular compliance with statutory requirements for proper accounting and statutory, in particular professional, commercial and tax law document retention obligations.</p>	<p>-</p>

	<p>contract data,</p> <p>invoice data,</p> <p>payment data.</p>		<p>If the data subject is our business partner, the legal basis is also the performance of a contract to which the subject is party (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).</p> <p>If the data subject is not our business partner, the legal basis is also a balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the performance of the contract with our business partner.</p>	
<p>Document retention for evidence purposes for the establishment, exercise and defence of legal claims.</p>	<p>Master data,</p> <p>identification data</p> <p>contact data,</p> <p>bank account data,</p> <p>communication data,</p> <p>contract data,</p> <p>record data,</p> <p>invoice data,</p> <p>payment data.</p>	<p>No automated decision-making takes place.</p>	<p>Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the establishment, exercise or defence of legal claims.</p>	-
<p>Establishment, exercise or defence of legal claims, including cooperation with external lawyers.</p>	<p>Master data,</p> <p>identification data</p>	<p>No automated decision-making takes place.</p>	<p>Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate</p>	<p>Courts,</p> <p>lawyers.</p>

	<p>contact data,</p> <p>bank account data,</p> <p>communication data,</p> <p>contract data,</p> <p>invoice data,</p> <p>payment data.</p>		<p>interest is the establishment, exercise or defence of legal claims.</p>	
<p>Cooperation with external tax advisors and/or public accountants in order to comply with statutory obligations.</p>	<p>Master data,</p> <p>identification data</p> <p>contact data,</p> <p>bank account data,</p> <p>communication data,</p> <p>contract data,</p> <p>invoice data,</p> <p>payment data.</p>	<p>No automated decision-making takes place.</p>	<p>Compliance with a legal obligation (point (c) of Article 6 paragraph 1 of the General Data Protection Regulation).</p>	<p>Tax advisors,</p> <p>public accountants.</p>
<p>Cooperation with supervisory authorities, courts and other public bodies in order to comply with statutory obligations.</p>	<p>Master data,</p> <p>identification data</p> <p>contact data,</p> <p>bank account data,</p> <p>communication data,</p>	<p>No automated decision-making takes place.</p>	<p>Compliance with a legal obligation (point (c) of Article 6 paragraph 1 of the General Data Protection Regulation).</p>	<p>Supervisory authorities,</p> <p>courts and other public bodies.</p>

	<p>contract data,</p> <p>invoice data,</p> <p>payment data.</p>			
<p>Business relationship management, including establishing contact to inform our business partners and maintaining the relationship with our business partners and adapting our services to the needs and wishes of our business partners.</p>	<p>Master data,</p> <p>contact data,</p> <p>communication data,</p> <p>contract data,</p> <p>record data,</p> <p>analysis data,</p> <p>survey data.</p>	<p>No automated decision-making takes place.</p>	<p>The legal basis for the business relationship management is in principle a balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the maintenance and strategic alignment of the relationship with our business partners and the adapting of our services to the needs and wishes of our business partners.</p> <p>The legal basis for establishing contact to inform our business partners can, depending on the circumstances of the individual case, in particular the type of contact, either be consent (point (a) of Article 6 paragraph 1 of the General Data Protection Regulation) or a balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is informing our business partners.</p>	-
<p>Proper internal administration, including the operation of IT-systems for administrative purposes.</p> <p>For the operation of our IT, we use specialized service providers who process data on our behalf.</p>	<p>Master data,</p> <p>identification data,</p> <p>contact data,</p> <p>bank account data,</p>	<p>No automated decision-making takes place.</p>	<p>Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the proper internal administration.</p>	IT Service Provider.

	communication data, contract data, invoice data, payment data.			
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### III. Details on the recipients of personal data and the transfer of personal data to third countries and/or international organisations

Recipient	Recipient's role	Recipient's location	Adequacy decision or appropriate or suitable safeguards for transfers to third countries and/or international organisations
Other companies of our corporate group: <ul style="list-style-type: none"> <li>• Schaltbau France S.A.S</li> <li>• Schalltbau Machine Electrics Ltd.</li> <li>• Schaltbau Austria GmbH</li> <li>• SPII S.p.A</li> <li>• Schaltbau North Amerika Inc.</li> </ul>	Controller	<ul style="list-style-type: none"> <li>• EU,</li> <li>• EU,</li> <li>• EU,</li> <li>• EU,</li> <li>• USA.</li> </ul>	For transfers to the USA:  There is no applicable adequacy decision by the EU Commission in the sense of Article 45 paragraph 3 of the General Data Protection Regulation.  The transfers are subject to EU Standard Contractual Clauses pursuant to Article 46 paragraph 5 of the General Data Protection Regulation, which were enacted under Article 26 paragraph 4 of the former Data Protection Directive (Directive 95/46/EC). A copy of the Standard Contractual Clauses can be obtained through our data protection officer (see the contact data in Section A).
Dependent branches of Schaltbau GmbH:	Part of the controller	Russia.	There is no applicable adequacy decision by the EU Commission in the sense of



<ul style="list-style-type: none"> <li>Schaltbau Russia</li> </ul>			<p>Article 45 paragraph 3 of the General Data Protection Regulation.</p> <p>The transfers are subject to EU Standard Contractual Clauses pursuant to Article 46 paragraph 5 of the General Data Protection Regulation, which were enacted under Article 26 paragraph 4 of the former Data Protection Directive (Directive 95/46/EC).</p> <p>As we are not able to enter into the Standard Contractual Clauses with our dependent branch by means of a contract between us and our dependent branch, <b>we guarantee the compliance with the Standard Contractual Clauses to the data subjects (i.e. our potential and existing business partners as well as their employees) instead.</b></p>
Lawyers.	Controller	EU.	-
Public accountants.	Controller	EU.	-
Tax advisors.	Controller	EU.	-
Supervisory authorities, courts and other public bodies.	Controller	EU.	-
Shipping services providers	Controller	EU.	-
Credit agencies	Controller	EU.	-
IT Service Provider	Processor	EU.	-

#### **D. Information on the processing of personal data of the users of our online services**

In connection with the provision of our online services, in particular our website and the offers provided on the website, we process personal data of users of our online services.

We process data of the users of our online services in particular to provide the respective services.

#### **E. Information on the rights of data subjects**

As a data subject, you have the following rights with regard to the processing of your personal data:

- Right of access (Article 15 of the General Data Protection Regulation)
- Right to rectification (Article 16 of the General Data Protection Regulation)
- Right to erasure (“right to be forgotten”) (Article 17 of the General Data Protection Regulation)
- Right to restriction of processing (Article 18 of the General Data Protection Regulation)
- Right to data portability (Article 20 of the General Data Protection Regulation)
- Right to object (Article 21 of the General Data Protection Regulation)
- Right to withdraw consent (Article 7 paragraph 3 of the General Data Protection Regulation)
- Right to lodge a complaint with a supervisory authority (Article 77 of the General Data Protection Regulation)

You may contact us for the purpose of exercising your rights using this contact information:

#### **Contact of the company**

Schaltbau GmbH  
Hollerithstraße 5, 81829 Munich, Germany  
dataprotection@schaltbau.de

## Contact details of the company's data protection officer

Ditis Systeme, Niederlassung der JMV GmbH & Co. KG  
Stefan Hackenberg  
Lise–Meitner–Straße 15  
Science-Park II  
89081 Ulm, Germany  
Stefan.Hackenberg@ditis.de

Information on any specific modalities and mechanisms that may facilitate the exercise of your rights, in particular to exercise your rights to data transferability and objection, may be found in the information on the processing of personal data in **Sections B to D** of this Data Protection Information and in other specific data protection information.

Below you find more detailed information on your rights with regard to the processing of your personal data:

### I. Right of access

As a data subject, you have a right to obtain access and information under the conditions provided in Article 15 of the General Data Protection Regulation.

This means in particular that you have the right to obtain confirmation from us as to whether we are processing your personal data. If so, you also have the right to obtain access to the personal data and the information listed in Article 15 paragraph 1 of the General Data Protection Regulation. This includes information regarding the purposes of the processing, the categories of personal data that are being processed and the recipients or categories of recipients to whom the personal data have been or will be disclosed (Article 15 paragraph 1 points (a), (b) and (c) of the General Data Protection Regulation).

You can find the full extent of your right to access and information in Article 15 of the General Data Protection Regulation, which can be accessed using the following link: <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>.

### II. Right to rectification

As a data subject, you have the right to rectification under the conditions provided in Article 16 of the General Data Protection Regulation.

This means in particular that you have the right to receive from us without undue delay the rectification of inaccuracies in your personal data and completion of incomplete personal data.

You can find the full extent of your right to rectification in Article 16 of the General Data Protection Regulation, which can be accessed using the following link: <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>.

### **III. Right to erasure (“right to be forgotten”)**

As a data subject, you have a right to erasure (“right to be forgotten”) under the conditions provided in Article 17 of the General Data Protection Regulation.

This means that you have the right to obtain from us the erasure of your personal data and we are obliged to erase your personal data without undue delay when one of the reasons listed in Article 17 paragraph 1 of the General Data Protection Regulation applies. This can be the case, for example, if personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed (Article 17 paragraph 1 point (a) of the General Data Protection Regulation).

If we have made the personal data public and are obliged to erase it, we are also obliged, taking account of available technology and the cost of implementation, to take reasonable steps, including technical measures, to inform controllers which are processing the personal data that you have requested the erasure by such controllers of any links to, or copy or replication of those personal data (Article 17 paragraph 2 of the General Data Protection Regulation) .

The right to erasure (“right to be forgotten”) does not apply if the processing is necessary for one of the reasons listed in Article 17 paragraph 3 of the General Data Protection Regulation. This can be the case, for example, if the processing is necessary for compliance with a legal obligation or for the establishment, exercise or defence of legal claims (Article 17 paragraph 3 points (b) and (e) of the General Data Protection Regulation).

You can find the full extent of your right to erasure (“right to be forgotten”) in Article 17 of the General Data Protection Regulation, which can be accessed using the following link: <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>.

### **IV. Right to restriction of processing**

As a data subject, you have a right to restriction of processing under the conditions provided in Article 18 of the General Data Protection Regulation.

This means that you have the right to obtain from us the restriction of processing if one of the conditions provided in Article 18 paragraph 1 of the General Data Protection Regulation applies. This can be the case, for example, if you contest the accuracy of the personal data. In such a case, the restriction of processing lasts for a period that enables us to verify the accuracy of the personal data (Article 18 paragraph 1 point (a) of the General Data Protection Regulation).

Restriction means that stored personal data are marked with the goal of restricting their future processing (Article 4 paragraph 3 of the General Data Protection Regulation).

You can find the full extent of your right to restriction of processing in Article 18 of the General Data Protection Regulation, which can be accessed using the following link: <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>.

## V. Right to data portability

As a data subject, you have a right to data portability under the conditions provided in Article 20 of the General Data Protection Regulation.

This means that you generally have the right to receive your personal data with which you have provided us in a structured, commonly used and machine-readable format and to transmit those data to another controller without hindrance from us if the processing is based on consent pursuant to Article 6 paragraph 1 point (a) or Article 9 paragraph 2 point (a) of the General Data Protection Regulation or on a contract pursuant to Article 6 paragraph 1 point (b) of the General Data Protection Regulation and the processing is carried out by automated means (Article 20 paragraph 1 of the General Data Protection Regulation).

You can find information as to whether an instance of processing is based on consent pursuant to Article 6 paragraph 1 point (a) or Article 9 paragraph 2 point (a) of the General Data Protection Regulation or on a contract pursuant to point (b) of Article 6 paragraph 1 of the General Data Protection Regulation in the information regarding the legal basis of processing in **Sections B to D** of this Data Protection Information.

In exercising your right to data portability, you also generally have the right to have your personal data transmitted directly from us to another controller if technically feasible (Article 20 paragraph 2 of the General Data Protection Regulation).

You can find the full extent of your right to data portability in Article 20 of the General Data Protection Regulation, which can be accessed using the following link: <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>.

## VI. Right to object

As a data subject, you have a right to object under the conditions provided in Article 21 of the General Data Protection Regulation.

At the latest in our first communication with you, we expressly inform you of your right, as a data subject, to object.

More detailed information on this is given below:

## 1. Right to object on grounds relating to the particular situation of the data subject

As a data subject, you have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data which is based on point (e) or (f) of Article 6 paragraph 1, including profiling based on those provisions.

You can find information as to whether an instance of processing is based on point (e) or (f) of Article 6 paragraph 1 of the General Data Protection Regulation in the information regarding the legal basis of processing in **Sections B to D** of this Data Protection Information.

In the event of an objection relating to your particular situation, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

You can find the full extent of your right to objection in Article 21 of the General Data Protection Regulation, which can be accessed using the following link: <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>.

## 2. Right to object to direct marketing

Where your personal data are processed for direct marketing purposes, you have the right to object at any time to processing of your personal data for such marketing, which includes profiling to the extent that it is related to such direct marketing.

You can find information as to whether and to what extent personal data are processed for direct marketing purposes in the information regarding the legal basis of processing in **Sections B to D** of this Data Protection Information.

If you object to processing for direct marketing purposes, we no longer process your personal data for these purposes.

You can find the full extent of your right to objection in Article 21 of the General Data Protection Regulation, which can be accessed using the following link: <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>.

## VII. Right to withdraw consent

Where an instance of processing is based on consent pursuant to Article 6 paragraph 1 point (a) or Article 9 paragraph 2 point (a) of the General Data Protection Regulation, as a data subject, you have the right, pursuant to Article 7 paragraph 3 of the General Data Protection Regulation, to withdraw your consent at any time. The withdrawal of your consent does not affect the legitimacy of the processing that occurred based on your consent until the withdrawal. We inform you of this before you grant your consent.

You can find information as to whether an instance of processing is based on Article 6 paragraph 1 point (a) or Article 9 paragraph 2 point (a) of the General Data Protection Regulation in the information regarding the legal basis of processing in **Sections B to D** of this Data Protection Information.

### **VIII. Right to lodge a complaint with a supervisory authority**

As a data subject, you have a right to lodge a complaint with a supervisory authority under the conditions provided in Article 77 of the General Data Protection Regulation.

The supervisory authority responsible for us is:

Bayerisches Landesamt für Datenschutzaufsicht  
Promenade 27 (Schloss)  
91522 Ansbach  
Phone: 0981/53-1300  
Fax: 0981/53-5300  
E-Mail: [poststelle@lda.bayern.de](mailto:poststelle@lda.bayern.de)

## F. Information about the technical terms of the General Data Protection Regulation used in this Data Protection Information

The technical terms relating to data protection used in this Data Protection Information have the meaning used in the General Data Protection Regulation.

The full scope of the definitions of the General Data Protection Regulation can be found in Article 4 of the General Data Protection Regulation, which can be downloaded from the following link: <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>.

You will find more detailed information on the most important technical terms of the General Data Protection Regulation used in this Data Protection Information below:

**“Personal data”** means any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

**“Data Subject”** means the respective identified or identifiable natural person, to which the personal Data refers to;

**“Processing”** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

**“Profiling”** means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person’s performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;

**“Controller”** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

**“Processor”** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

**“Recipient”** means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

**“Third party”** means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;



**“International organisation”** means an organisation and its subordinate bodies governed by public international law, or any other body which is set up by, or on the basis of, an agreement between two or more countries;

**“Third country”** means a country which is not a member state of the European Union (“EU”) or the European Economic Area (“EEA”);

**“Special categories of personal data”** means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation.

## **G. Effective date and changes to this Data Protection Information**

The effective date of this Data Protection Information is 01.12.2018.

It may be necessary to modify this Data Protection Information due to technical developments and/or amendment of statutory or official requirements.

An up-to-date version of this Data Protection Information can be retrieved at any time at [https://www.schaltbau-gmbh.com/files/data\\_protection\\_information externals.pdf](https://www.schaltbau-gmbh.com/files/data_protection_information externals.pdf)