

PRIVACY NOTICE

As the data controller weve prepared this privacy notice to inform you in accordance with the requirements of the EU General Data Protection Regulation 2016/679 (GDPR) about the nature, scope and purpose of the processing of personal data in relation to corporate functions and events.

I. Definitions

Personal data

„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;

Processing

„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;

Controller

„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;

Recipient

„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;

II. General information

1. The data controller

Heinzmann GmbH & Co. KG
Am Haselbach 1
79677 Schönau
Germany
Telephone: +49 7673 8208-0
E-Mail: info@heinzmann.de

2. Contact details of the Data Protection Officer

OBSECOM GmbH

Königstr. 40

70173 Stuttgart

Germany

Telephone: +49 711 4605025-40

Telefax: +49 711 4605025-49

E-Mail: datenschutz@obsecom.de

Website: www.obsecom.eu

3. Legal bases

We process personal data based on at least one of the following legal bases:

- ▶ The data subject has given consent to the processing of his or her personal data for one or more specific purposes (Art. 6 (1) lit. a GDPR);
- ▶ Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Art. 6 (1) lit. b GDPR);
- ▶ Processing is necessary for compliance with a legal obligation to which we are subject (Art. 6 (1) lit. c GDPR);
- ▶ Processing is necessary in order to protect the vital interests of the data subject or of another natural person (Art. 6 (1) lit. d GDPR);
- ▶ Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party (Art. 6 (1) lit. f GDPR)

In this privacy policy we refer to the respective legal bases of the individual processing activities.

4. Onward transfer of personal data

We may pass on personal data to third parties if this is necessary to perform pre-contractual measures and fulfil our contractual obligations, for example to hold the event and process payments (for example, payment service providers). Beyond that we forward personal data to recipients (data processors or other third parties) only to the extent required and only if one of the subsequent conditions are met:

- ▶ The data subject has consented to the data transfer;
- ▶ The onward transfer is required to fulfil a contractual obligation or pre-contractual measure on the request of the data subject;
- ▶ We are obliged by law to make such a transfer;
- ▶ The onward transfer is made on the basis of our legitimate interest or on those of a third party.

5. Third countries

The transfer of personal data to a third country or an international organisation outside the European Union (EU) or the European Economic Area (EEA) is subject to legal or contractual permission only in accordance with the provisions under Art. 44 et seq. GDPR. It means that pursuant to Art. 45 GDPR an

adequacy decision of the EU commission must be present for the respective country, appropriate safeguards for data privacy under Art. 46 GDPR, or Binding Corporate Rules under Art. 47 GDPR do exist. In individual cases, a data transfer may be permitted on the basis of an exception under Art. 49 GDPR.

6. Rights of data subjects

As a data subject you have the following rights:

- ▶ Pursuant to Art. 15 GDPR to request information about your personal data processed by us. You may also request information regarding the purposes of the processing; the categories of personal data concerned; the recipients or categories of recipients to whom the personal data have been or will be disclosed; the envisaged period for which the personal data will be stored, or the criteria used to determine that period; where the personal data are not collected from you, the data source; the existence of automated decision-making, including profiling, and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing; the existence of the right to request rectification or erasure of data concerning you, the right to restrict processing or to object to such processing, the right to lodge a complaint with a supervisory authority. Finally, you have a right to know whether personal data has been transferred to a third country or to an international organisation, and, if so, the appropriate safeguards relating to this transfer;
- ▶ Pursuant to Art. 16 GDPR to demand the immediate rectification of inaccurate personal data and to have incomplete personal data that are stored by us to be completed;
- ▶ Pursuant to Art. 17 GDPR to demand the erasure of your personal data stored by us, unless the processing is necessary for exercising the right of freedom of expression and information, for compliance with a legal obligation, for reasons of public interest, or for the establishment, exercise or defence of a legal claim;
- ▶ Pursuant to Art. 18 GDPR to request the restriction of the processing of your personal data if the accuracy of the personal data is contested by you; the processing is unlawful but you oppose the erasure of the personal data and request the restriction of their use instead; we no longer need the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims; you have objected to processing pursuant to Art. 21(1) GDPR pending the verification whether our legitimate grounds override your interests;
- ▶ Pursuant to Art. 20 GDPR to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller;
- ▶ Pursuant to Art. 21 GDPR to object to the processing of your personal data on grounds relating to your particular situation, or if you object to processing for direct marketing purposes and the legal basis for the processing are our legitimate interests pursuant to Art. 6 (1) lit. f GDPR;
- ▶ Pursuant to Art. 7(3) GDPR to withdraw your consent given to us at any time. As a result, we are no longer allowed to continue to process the data that was based on this consent in the future;
- ▶ Pursuant to Art. 77 GDPR to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement. A list of contact details of the data protection officers and supervisory authorities can be found on this web site:
<https://www.bfdi.bund.de/EN/Service/Anschriften/Laender/Laender-node.html>

If you wish to assert the data subject rights mentioned above, you can contact us or our Data Protection Officer at any time using the contact details above.

7. Erasure and restriction of personal data

Unless otherwise provided for in this privacy notice, personal data will be deleted, if these data are no longer necessary in relation to the purposes for which they were collected or otherwise processed and the deletion does not conflict with statutory retention requirements. In addition, we will erase the personal data processed by us in accordance with Art. 17 GDPR on your request, if the conditions provided therein are met. For example, we delete your data if the corresponding processing is based on your consent, you withdraw this consent and there is no other legal basis for the processing. If personal data are required for other lawful purposes, they will not be erased, but their processing will be restricted in accordance with Art. 18 GDPR. In case of restriction, the data will not be processed for other purposes.

III. Individual processing activities

1. Image and video recordings for archival purposes

At our corporate functions and events, we create image and video recordings for archiving purposes and to document our company history. This may include the publication of images in anniversary publications and use for internal presentation purposes. The legal basis is our legitimate interest in documenting our company history in accordance with Art. 6 (1) lit. f GDPR.

2. Image and video recordings for marketing purposes

We create image and video recordings for use in corporate videos and social media clips on the HEINZMANN Group social media profiles and websites as well as for press and public relation purposes. Where required by law, we will ask for your consent to create and publish images, in which you are pictured. Depending on the personal reference, type and motive of the image, the legal basis for the processing of personal data is either our legitimate interest in the documentation of the company's activities and public relations in accordance with Art. 6 (1) lit. f GDPR or the voluntarily given consent of the individuals depicted pursuant to Art. 6 (1) lit. a GDPR.

3. Participation in events

In connection with your participation in free events (for example, company anniversaries, trade fairs or promotional events), we process your name, e-mail address and other contact details for the purpose of sending invitations and event-related information. Depending on the customer relationship, the legal basis for the processing of personal data is either your voluntarily given consent to receive such information in accordance with Art. 6 (1) lit. a GDPR or our overriding legitimate interest in direct marketing and maintaining customer relationships in accordance with Art. 6 (1) lit. f GDPR.

4. Registration for paid events

If you register for paid events, we process your personal data for the purpose of fulfilling pre-contractual measures and contractual obligations, which are carried out at the request of the data subject. These data categories include:

- ▶ Data of the contracting party, for example, address and contact details, company affiliation and, if applicable, alternate billing address;
- ▶ Contractual documentation including subject matter or customer category

The legal basis for data processing is Art. 6 (1) lit. b GDPR.

5. E-Mail direct marketing to customers

If you are an existing customer and we have received your e-mail address in connection with the sale of goods or services, we may use your e-mail address for direct marketing purposes of our own similar goods or services. This only applies if you have not objected and we clearly and unequivocally have

advised you of the possibility of objection at the time of collecting the e-mail address, and every time we use it. The legal basis of processing is our legitimate interest in direct marketing according to Art. 6 (1) lit. f GDPR.

6. Newsletter

If you would like to receive our newsletter, we need your e-mail address. The data processing for the purpose of sending the newsletter takes place in accordance with Art. 6 (1) lit. a GDPR based on your voluntary consent by means of the so-called double-opt-in procedure. The e-mail address will be used and stored for this purpose until you withdraw your consent or unsubscribe from receiving the newsletter. You can unsubscribe at any time, for example by using the link at the bottom of each newsletter. You can also send your withdrawal/unsubscribe request at any time to the e-mail address given under Clause II.

We embed a so-called counting pixel into our newsletters. A counting pixel is a miniature graphic embedded in the HTML format of the newsletter to allow us an analysis of the reader's reading behaviour. In this context, we gather information whether and at what time a newsletter was opened by you and which of the links contained in the newsletter were accessed by you. We use this data to generate statistical evaluations of the success or failure of a marketing campaign in order to optimize the distribution of our newsletters and to better tailor the content of future newsletters to your interests. The collected data will not be passed on to third parties and will be deleted after the statistical evaluation.