

Transparency and information obligations for customers, suppliers, contractual partners and interested parties of VARIOVAC PS SystemPack GmbH

in accordance with the EU General Data Protection Regulation (GDPR)

This document provides information on the processing of your personal data by VARIOVAC PS SystemPack GmbH and the rights granted to you under the GDPR Rights to which you are entitled under data protection law.

Data controller/data protection

Address

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Contact information

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+49 (0) 38851-823 0
Email: info@variovac.de

Contact Data protection

Tel: +49 (0) 38851-823 0
Email: datenschutz@variovac.de

Categories/origin of the data

We process the following personal data as part of the contractual relationship and for the initiation of the contract:

For business contacts:

- Contact details (e.g. first and last names of the current and, if applicable, previous contact persons as well as name affixes, company name and address of the customer/supplier)
(employer), telephone number with extension, business email address)
- Job-related data (e.g. function in the company, department)

We generally receive your personal data from you as part of the contract initiation process or during the ongoing contractual relationship. Exceptionally, in certain constellations, your personal data will also be collected by other organisations. This includes ad hoc queries to relevant information from credit agencies, in particular regarding the creditworthiness and credit behaviour of our (future) contractual partner.

In the IT environment, VARIOVAC PS SystemPack GmbH relies on products from Microsoft Corporation, among others. The following categories of data may be processed in the course of using the IT systems:

- Functional data (data absolutely necessary for the provision of services)
- Content data (content data that is processed as part of the services)
- Diagnostics data & Log data (technically logged data required for maintenance, troubleshooting and, in some cases, further development)

These categories of data are collected directly from you. We will be happy to provide you with further information on data processing in specific IT systems on request.

We process the following personal data as part of our online meetings using Microsoft Teams:

- Communication data (e.g. your email address, if you provide it personally)
- Log files, log data
- Metadata (e.g. IP address, time of participation, etc.)
- Profile data (e.g. your user name, if you provide this yourself)

We would like to point out that we are not responsible for further data processing, for example in connection with accessing the MS Teams website and/or installing the MS Teams app.

Microsoft reserves the right to process customer data for its own business purposes. We have no influence on this data processing by Microsoft. To the extent that Microsoft Teams processes personal data in connection with its business purposes, Microsoft is an independent controller of such data

Data processing activities and as such is responsible for compliance with all applicable data protection regulations. If you require information about the processing by Microsoft, please refer to the corresponding Microsoft statement.

Purposes and legal bases of data processing

When processing your personal data, the provisions of the GDPR, the BDSG and other relevant legal provisions are always complied with.

Your personal data will be processed exclusively for the implementation of pre-contractual measures (e.g. for the preparation of offers for products or services) and for the fulfilment of contractual obligations with your employer (e.g. for the implementation of our service, the supplier contract or for order/order/payment processing), (Art. 6 para. 1 let. f GDPR) or if there is a legal obligation to process (e.g. due to tax law requirements) (Art. 6 para. 1 let. c GDPR). The personal data is originally collected for these purposes.

The processing of your data is based on our legitimate interest in getting in touch with your employer and you as a contact person.

If you object to this on grounds relating to your particular situation, we will no longer process your data unless we have compelling legitimate grounds for the processing which override your interests, rights and freedoms or the processing serves the establishment, exercise or defence of legal claims.

Please note that we will no longer be able to contact you in the event of a justified objection.

If you conclude a contract with us yourself, your personal data will be processed exclusively for the implementation of pre-contractual measures (e.g. for the preparation of offers for products or services) and for the fulfilment of contractual obligations (e.g. for the

implementation of our services, the supplier contract or for order/order/payment processing) (Art. 6 para. 1 let. b GDPR).

Your consent to data processing can of course also constitute a data protection authorisation provision (Art. 6 para. 1 let. a GDPR). Before issuing the consent, we will inform you about the purpose of the data processing and about your right of cancellation in accordance with Art. 7 para. 3 GDPR. If the consent also relates to the processing of special categories of personal data in accordance with Art. 9 GDPR, we will expressly inform you of this in advance.

VARIOVAC PS SystemPack GmbH also has an interest in maintaining customer relations with you and sending you information and offers about our products/services by email or telephone. We therefore process your data in order to send you relevant information and offers (Art. 6 para.

1 let. f GDPR).

See also: "Rights of data subjects".

Your personal data will only be processed to detect any criminal offences under the conditions of Art. 10 GDPR.

Storage period of the data

As soon as your data is no longer required for the above-mentioned purposes or you have withdrawn your consent, it will be deleted by us. The data will only be stored beyond the existence of the contractual relationship with you or your employer/client in cases where we are obliged or authorised to do so. Regulations that require us to retain data can be found, for example, in the

Commercial Code or in the Fiscal Code. This may result in a retention period of up to ten years. In addition, further statutory limitation periods must be observed.

Recipients of the data/categories of recipients

In our company, we ensure that only those departments and persons receive your data who need it to fulfil our contractual and legal obligations.

In certain cases, service providers support our specialist departments in the fulfilment of their tasks. The necessary data protection contracts were concluded with all service providers (IT service providers, research and development, tax consultants, auditors).

In addition, we are required by law to provide certain information to public authorities, such as tax authorities, law enforcement agencies and customs authorities.

Third country transfer/intention to transfer to a third country

Data will only be transferred to third countries (outside the European Union or the European Economic Area) if this is necessary or legally required for the fulfilment of the contractual or supplier relationship or if you have given us your consent to do so.

We do not currently transfer your personal data to any service providers or group companies outside the European Economic Area, except when using Microsoft 365.

When selecting service providers, we endeavour to use European service providers (service providers within the European Economic Area). However, this is not always possible - for

example in the case of Microsoft. If service providers from third countries are used, care is taken to ensure that the configuration is as restrictive as possible.

(In the case of Microsoft, for example, data processing in Europe is agreed.)

In addition, the configuration is restricted by IT experts and individual processing operations are coordinated with the data protection officer)

Sanctions list check

As part of the customer and supplier selection process, we carry out a check against relevant sanctions lists before the start of the contractual relationship. This is based on our legitimate interest (Art. 6 para. 1 let. f GDPR) in not maintaining contractual relationships with a terrorist organisation, etc. Your company's data is transferred to the external service provider BEO to carry out the audit. They will carry out the inspection and then send us the results. Proof of the audit is retained for the duration of the contractual relationship. The examinations are repeated regularly.

Rights of the data subjects

Your rights as a data subject are standardised in Art. 15 - 22 GDPR.

This includes:

- The right to information (Art. 15 GDPR)
- The right to rectification (Art. 16 GDPR)
- The right to erasure (Art. 17 GDPR)
- The right to restriction of processing (Art. 18 GDPR)
- The right to object to processing (Art. 21 GDPR)
- The right to data portability (Art. 20 GDPR)

To assert these rights, please contact: datenschutz@variovac.de. The same applies if you have any questions about data processing in our company or wish to withdraw your consent. You can also lodge a complaint against the data processing with a data protection supervisory authority.

If we process your personal data for the purpose of direct marketing, you have the right to object without giving reasons; this also applies to profiling insofar as it is associated with such direct marketing. If you object to processing for direct marketing purposes, we will no longer process your personal data for these purposes.

Obligation to provide the data

You are obliged to provide certain personal data in order to enter into or fulfil a contractual relationship. This is necessary for the establishment, implementation and termination of the contractual relationship and the fulfilment of the associated contractual and legal obligations. It is not possible to fulfil the contract without providing this data.

Automated decisions in individual cases

We do not use purely automated processing to reach a decision.