

## Data protection information

With the following information we would like to give you an overview of the processing of your personal data by us and your rights under data protection law (GDPR / FDPA). Which data are processed in detail and how they are used depends largely on the requested or agreed services. Therefore, not all parts of this information will apply to you. Who is responsible for data processing and to whom can you contact?

Responsible: **L.B. BOHLE Maschinen + Verfahren GmbH**, Industriestrasse 18, 59320 Ennigerloh and thus "Responsible Body" hereafter "L.B. Bohle" or "we".

You can contact our data protection officer at [Datenschutz@lbbohle.de](mailto:Datenschutz@lbbohle.de) or by post at **L.B. BOHLE Maschinen + Verfahren GmbH**, attn: Data Protection Officer, Industriestrasse 18, 59320 Ennigerloh.

### 1. What sources and data do we use?

We process personal data that we receive from our customers or other interested parties within the framework of our business relationship. To the extent necessary for the provision of our services, we process personal data which we may obtain from publicly accessible sources (e.g. commercial and association registers, press, Internet) or which is legitimately transmitted to us by other companies of our group members or by other third parties (e.g. a credit agency).

Relevant personal data are personal data (name, address and other contact data, date and place of birth as well as nationality), identification data (e.g. identity card data), order data (e.g. payment order), data from the fulfilment of our contractual obligations (e.g. turnover data in payment transactions), information about your financial situation (e.g. credit history) and other data comparable with the categories mentioned. In addition, we store your order history and your correspondence with us.

### 2. What do we process your data for (purpose of processing) and on what legal basis?

We process personal data in accordance with the provisions of the EU General Data Protection Regulation (GDPR) and the Federal Data Protection Act (FDPA).

#### a. to fulfil contractual obligations (Art. 6(1)(b) GDPR)

The processing of data takes place for the provision of our production and services within the framework of the execution of our contracts with our customers or for the

execution of pre-contractual measures, which take place on request. The purposes of data processing depend primarily on the specific product or service. Your data will also be used to evaluate and accept you as a business partner, for example to confirm and verify your identity. We also process your personal data for other administrative purposes, such as due diligence and comparison with publicly available sanction lists of government and/or law enforcement authorities. This processing is absolutely necessary for the conclusion of a contract between you and us. We also use your personal data for administrative purposes, such as sending invoices and making payments. We also use your personal data to deliver/provide and manage our or your products or services. If you need access to our buildings/premises, we process your personal data for verification purposes.

Further details on data processing purposes can be found in the relevant contractual documents and terms and conditions.

#### **b. in the context of balancing interests (Art. 6(1)(f) GDPR)**

If necessary, we process your data beyond the actual fulfilment of the contract to protect the legitimate interests of us or third parties:

- Measures for business management and further development of services and products,
- Advertising if you have not objected to the use of your data, sending suitable offers, account management and recall purposes.
- For the execution of business processes and internal management. This includes general administration, order management and administration of the assets of L.B. Bohle. We have central data processing facilities. We carry out audits and investigations as well as corporate controls and manage and use customer, vendor and business partner directories. We also process your personal data for financial, accounting, archiving and insurance purposes.
- Enforcement of legal claims and defense in legal disputes,
- Ensuring the IT security and IT operation of our company,
- Prevention and investigation of criminal offences,
- Video surveillance for the protection of the householder's rights, for the collection of evidence in robberies
- Measures for building and system security (e.g. access controls),
- Measures to secure domiciliary rights,
- Risk management in the company

#### **c. on the basis of your consent (Art. 6(1)(a) GDPR)**

If you have given us your consent to process personal data for specific purposes (e.g. invitations to events, promotions, etc.), the legality of such processing is based on your

consent. A given consent can be revoked at any time. This also applies to the revocation of declarations of consent issued to us prior to the validity of the GDPR, i.e. before 25 May 2018. The revocation of a consent is only effective for the future and does not affect the legality of the data processed until revocation.

### **3. Who receives your data?**

Within the company, those departments that need your data to fulfil our contractual and legal obligations will have access to it. Service providers and vicarious agents employed by us may also receive data for these purposes. These are companies in the categories IT services, logistics, printing services, telecommunications, consulting, banks, insurance companies, auditors as well as sales and marketing.

If third parties gain access to your personal data, L.B. Bohle will take the contractual, technical and organizational measures required to ensure that your personal data is only processed to the extent that such processing is necessary. Third parties are obliged to always comply with the applicable law when processing such data.

We may only pass on information about our customers if this is required by law or if the customer has consented.

Employees of L.B. Bohle may only access personal data if this is necessary to fulfil the respective purpose and their individual tasks can be completed.

### **4. Is data transferred to a third country or to an international organisation?**

Data is transferred to offices in countries outside the European Union (so-called third countries) to the extent that:

- it is necessary for the execution of your orders (e.g. payment orders),
- it is required by law (e.g. tax reporting obligations) or
- you have given us your consent.

Furthermore, a transfer to offices in third countries is foreseen in the following cases:

- Personal data of parties interested in our products and services can also be processed in the USA within the framework of a CRM system with their consent.
- With the consent of the person concerned or on the basis of legal regulations to combat money laundering, terrorist financing and other criminal acts, as well as within the framework of a weighing of interests, personal data (e.g.

legitimation data) are transmitted in individual cases in compliance with the data protection level of the European Union. L.B. Bohle will ensure that your personal data is adequately protected, for example by agreeing EU standard contractual clauses with these third parties. In other cases, your personal data will not be disclosed to third parties unless required by law.

## **5. How long will your data be stored?**

We process and store your personal data as long as this is necessary for the fulfilment of our contractual and legal obligations. It should be noted that our business relationship is a continuing obligation which is intended to last for years.

If the data are no longer required for the fulfilment of contractual or legal obligations, they are regularly deleted, unless their further processing - for a limited period - is necessary for the following purposes:

- Fulfilment of commercial and tax retention obligations, which may arise, for example, from: Commercial Code (HGB), Tax Code (AO), Money Laundering Act (GwG). The time limits specified there for storage or documentation are usually two to ten years.
- Preservation of evidence within the framework of the statutory statutes of limitations. According to §§ 195 et seq. of the German Civil Code (BGB), these limitation periods can be up to 30 years, whereby the regular limitation period is 3 years.

We have taken adequate precautions to ensure the confidentiality and protection of your personal data. The company has taken adequate technical, physical and organizational precautions to protect personal data from accidental or unlawful destruction or accidental loss, from damage, alteration, unauthorized disclosure or access, and from any other form of unlawful processing (including, but not limited to, unauthorized collection) or further processing. These include, for example, guidelines on IT security, employee training and server security.

## **6. What data protection rights do you have?**

Every data subject has the right to information pursuant to Article 15 GDPR, the right to rectification pursuant to Article 16 GDPR, the right to deletion pursuant to Article 17 GDPR, the right to limitation of processing pursuant to Article 18 GDPR, the right to opposition under Article 21 GDPR and the right to data transfer pursuant to Article 20 GDPR. The restrictions under §§ 34 and 35 FDPA apply to the right to information and the right to cancellation. In addition, there is a right of appeal to a competent data protection supervisory authority (Article 77 GDPR in conjunction with § 19 FDPA).

You can revoke your consent to the processing of personal data at any time. This also applies to the revocation of declarations of consent given to us before the GDPR came into force, i.e. before 25 May 2018. Please note that the revocation will only take effect in the future. Processing that took place before the revocation is not affected by this.

## **7. Is there an obligation for you to provide data?**

As part of our business relationship, you must provide the personal information that is necessary to establish, conduct and terminate a business relationship and to fulfill the contractual obligations associated therewith, or that we are required by law to collect. Without this information, we will generally not be able to enter into, execute and terminate a contract with you.

## **Information on your right of appeal under Article 21 (EU General Data Protection Regulation) GDPR**

### **1. Right of objection in individual cases**

For reasons arising from your particular situation, you have the right to object at any time to the processing of your personal data on the basis of Article 6(1)(e) GDPR (data processing in the public interest) and Article 6(1)(f) GDPR (data processing on the basis of a weighing of interests); this also applies to profiling based on this provision within the meaning of Article 4(4) GDPR.

If you file an objection, your personal data will no longer be processed unless we can prove compelling reasons for processing worthy of protection which outweigh your interests, rights and freedoms, or the processing serves to assert, exercise and defend legal claims.

### **2. Right to object to the processing of data for direct marketing purposes**

In individual cases we process your personal data for the purpose of direct advertising. You have the right at any time to object to the processing of your personal data for the purpose of such advertising; this also applies to profiling, insofar as it is connected with such direct advertising.

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

The objection can be made in any form and should be addressed as far as possible to:  
[info@lbohle.de](mailto:info@lbohle.de)