

Data Privacy Statement For Business Partners

Protecting the personal data of **contact partners at customers, suppliers, vendors and other partners** is a major concern of **Ulbrich of Austria GmbH**.

Therefor we process the smallest possible range of personal data in compliance with the applicable legal regulations on the protection of personal data and on data security

1. Purpose of data processing

- Processing of data within a business relationship:
 - i. Quotation processing
 - ii. Order processing
 - iii. Billing/Payments
 - iv. Bookkeeping
 - v. Administration
 - vi. etc.
- Sales and Marketing activities
 - i. (Potential) Customer/Supplier visits
 - ii. Distribution of invitations and brochures
 - iii. Customer survey
 - iv. Market analysis
 - v. Trade fairs
 - vi. Publication of papers in professional journals
 - vii. etc
- Ensuring compliance with legal requirements
 - i. Tax and commercial law
 - ii. Record retention periods
 - iii. Prevention of white-collar or money laundering crimes
 - iv. Handling of litigation
 - v. etc.

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2. Data categories

- Contact details
 - i. First and last name,
 - ii. Business address,
 - iii. Business telephone number (landline, mobile),
 - iv. Business fax,
 - v. Business e-mail,
 - vi. Position
- Company data of the business partner for processing payments,
- Bank details,
- Credit rating,
- Customs clearance data,
- Information collected from publicly available sources
- Information on legal proceedings and other legal disputes in which business partners are involved,
- Further information that may need to be processed in the context of a contractual relationship or that is provided voluntarily by our contact partners

3. Legal basis

- Necessary for the performance of a contract (Article 6 (1) b) GDPR)
- Legitimate interests pursued by the controller or by a third party (Article 6 (1) f)
 GDPR)
- compliance with a legal obligation (Article 6 (1) c) GDPR)
- The processing of personal data is necessary to achieve the purposes mentioned above including the performance of the relationship with business partners.

4. Transfer and disclosure of personal data

- Contact details as mentioned above may be transferred to other Ulbrich group companies or to other business partners, but only if this is required to achieve the purposes mentioned above and/or it is the own interest of the business partner.
- If necessary and permitted by law personal data will be transferred to courts, regulatory authorities or law firms in order to handle litigations.
- Personal data may be transferred to service providers (data processors) such as
 external Bookkeeping or IT maintenance service providers. These service providers
 are obliged by contract to comply with applicable requirements of data protection
 and data security law and only act upon instructions from Ulbrich of Austria GmbH.
- The recipients mentioned above may be located in "third countries" (countries outside of the EU). In this case personal data is transferred only if these recipients have entered into EU standard contractual clauses with Ulbrich of Austria GmbH.
- Also certification under the EU/US Privacy Shield is sufficient for personal data transfer if the recipients are located in the USA.

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5. Storage of data / retention periods

The retention period is as short as possible. The personal data is only stored as long as it is required to achieve the purpose for which it was stored.

Excluded is personal data with statutory retention requirements (e.g. tax or commercial law) or data needed in case of litigation.

6. Rights of the data subjects (business partners and contact partners)

- The partner has the right to object to the processing of personal data by Ulbrich of Austria GmbH.
- The partner has the right to disclosure on the personal data processed by Ulbrich of Austria GmbH.
- If our partner has declared its consent to the processing of their personal data, the
 partner has the right to withdraw the consent that has been granted at any time with
 future effect, i.e. the withdrawal does not affect the lawfulness of processing
 conducted on the basis of the consent before its withdrawal. After consent has been
 withdrawn, Ulbrich of Austria GmbH may further process the personal data only to
 the extent that Ulbrich of Austria GmbH can base the processing on other legal
 grounds.
- The partner has the right to obtain the rectification of incorrect personal data.
- The partner has the right to obtain the erasure of the personal data.
- The partner has the right to obtain the restriction of the processing of personal data.
- The partner has the right to receive the provided personal data in a structured, commonly used and machine-readable format and to request that the personal data be transmitted to a third party.

7. Responsible for data processing and contact information:

Ulbrich of Austria GmbH Industriestraße 1 7052 Müllendorf, Austria

Phone: +43 2682 61897-0

E-mail: <u>austria@ulbrich.com</u>

Ulbrich of Austria GmbH always aim to address and remedy any requests and complaints. Nevertheless, it is also possible to contact the competent data protection authority.

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