

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

according to the EU General Data Protection Regulation (GDPR)

With this document, we would like to inform you about the processing of your personal data by VARIOVAC PS SystemPack GmbH and the rights to which you are entitled under data protection law.

Responsible body (controller) and data protection officer

Company address

Ernst-Litfaß Str. 3 und 5
19246 Zarrentin am Schaalsee

Company's contact information

<https://www.variovac.de/de>

Tel.: +49 (0) 38851-823 0

Mail: info@variovac.de

Contact information of the data protection officer

Tel.: +49(0) 38851-823 0

Mail: datenschutz@variovac.de

Categories of data/data sources

We process the following personal data within the framework of the contractual relationship and for the initiation of a business relationship:

For business customers:

- Contact data (e.g. first/surname of current and previous contact persons, if applicable, name affixes, company name and address (employer), telephone number including extensions, business e-mail address)
- Occupational data (e.g. department including position)

As a matter of principle, we collect your personal data directly from you within the framework of current contractual transactions and the underlying relationship or in the framework of the initiation of a business relationship. In certain constellations, your personal data may exceptionally also be collected from other sources. This includes event-related queries on relevant information from credit agencies, in particular with regard to credit risk assessments and former credit behavior.

In the IT-environment, VARIOVAC PS SystemPack GmbH uses, inter alia, services of Microsoft Corporation. When using the IT-systems, the following categories of data might be processed:

- Functional data (data that is absolutely necessary for the provision of the service)
- Content data (data relating to content, which is processed within the scope of the services)
- Diagnostic & log data (technically logged data that is required for maintenance, troubleshooting, and occasionally for further development)

These categories of data are being collected systemically from you as a data subject. Further information on processing of personal data regarding specific IT-systems can be provided to you on request.

Within the scope of our online-meetings via Microsoft Teams, we process the following categories of personal data:

- Communication data (e.g. your email address, if you provide it in a personalized manner).
- Log files, protocol data
- Metadata (e.g. IP address, time of participation, etc.)
- Profile data (e.g. your user name, if provided voluntarily)

Please be aware, that we are not responsible for any further data processing e.g. the access to the MS-Teams-Website and/or the installation of the MS-Teams-App.

Microsoft reserves the right to process customer data for its own business purposes. We have no control over these data processing activities by Microsoft. To the extent that Microsoft Teams processes personal data in connection with business purposes, Microsoft is the independent data controller for those data processing activities and as such is responsible for compliance with all applicable data protection laws. If you require information about Microsoft's processing, please refer to the relevant Microsoft statement.

Purposes and lawfulness of data processing

When processing your personal data, the provisions of the GDPR, local data protection laws and other relevant legal provisions are always observed.

Your personal data is exclusively processed for the execution 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 execution of our services or for sales/order/payment processing) (Art. 6 (1) lit. f GDPR) or if there is a legal obligation for processing (e.g. due to tax regulations) (Art. 6 (1) lit. c GDPR). Personal data was 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 contact person.

In the event, that we process your data to protect legitimate interests, you may object to such processing at any time for reasons that arise from your specific situation. We will then cease to process your personal information unless we can demonstrate compelling legitimate grounds for processing such information that outweigh your interests, rights and freedoms, or the processing is intended to assert, exercise, or defend legal claims.

Please take notice that in the event of justified objection, we will no longer be able to contact you.

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 and services) and for the fulfilment of contractual obligations (e.g. for the implementation of our services of the supplier contract or for order/ payment processing) (Art. 6 (1) lit. b GDPR).

Of course, your consent may also constitute a legal basis for the processing of your personal data (Art. 6 (1) lit. a GDPR). Before you grant such consent, we will inform you about the purpose of the data processing and about your right of revocation according to Art. 7 (3) GDPR. Should the consent also refer to the processing of special categories of personal data in accordance with Art. 9 GDPR, we will explicitly point this out to you in advance.

VARIOVAC PS SystemPack GmbH would also like to maintain a relationship with you as a customer and send information and offers on products and services. We therefore use your data to email you relevant information and offers (Art. 6 (1) lit f GDPR).
See also: "Rights of data subjects".

Your personal data will only be processed for the detection of criminal offences if the requirements of Art. 10 GDPR are met.

Duration of data storage

We will delete data as soon as your data is no longer needed for the above-mentioned purposes or in the event that you revoked your consent. Data will only be stored beyond the existence of the contractual relationship with your employer/ client only in cases in which we are either obliged or entitled to do so. Regulations, which oblige us to keep data, can for example be found in commercial or tax laws. This may result in a storage period of up to ten years. In addition, statutory limitation periods must be observed.

Data recipients/categories of recipients

In our company, we make sure that only those departments and individuals receive your data that need them to fulfil contractual and legal obligations.

In many cases, service providers support our specialist departments in fulfilling their tasks. In this case, the necessary data protection agreements have been concluded with all service providers (IT-Service-providers, research and development, tax consultant, auditor).

Furthermore, in certain statutory cases, we are obliged to transmit certain information to public authorities, such as: Tax authorities, law enforcement agencies and customs authorities.

Intention to transfer data to a third country

A transfer of data to third countries (outside the European Union or the European Economic Area) only takes place if this is necessary for the execution of the underlying relationship or required by law or if you have given us your consent.

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

When selecting service providers, we make the attempt 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, we take measures to ensure that the configuration is as restrictive as possible.

(In the case of Microsoft, for example, data processing in Europe is agreed upon. In addition, the configuration is restricted by IT experts and individual processing operations are coordinated with the data protection officer).

Rights of data subjects

Your rights as a data subject are set out in Articles 15–22 GDPR, and include:

- The right to access (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 data portability (Art. 20 GDPR)
- The right to object to processing (Art. 21 GDPR)

To exercise these rights, please contact: datenschutz@variocac.de . The same applies if you have questions about data processing in our company or if you want to revoke your consent. You also have the right to lodge a complaint with the data protection supervisory authority.

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

Obligation to provide data

Certain personal data needs to be provided in the framework of our contractual/business relationship as such data are necessary for the establishment, execution and termination of the contractual relationship and the fulfilment of the associated contractual and legal obligations. Without the provision of such data, an execution of the above tasks and duties is not possible.

Automated individual decision-making

We do not use any automated decision-making.