

Data Privacy Notice

Protecting the security and privacy of your personal data is important to Siekmann Econosto. Therefore, the company named in the imprint (hereafter referred to as "Siekmann Econosto" or "SE") processes personal data in compliance with applicable on data protection and data security. We adhere to the principle: When storing and transmitting data, we must ensure a high level of data protection and data security, because data protection is people protection.

1. Processing of personal data related to your business relationship

Categories of personal data processed, purpose of the processing and legal basis

In the context of the business relationship with Siekmann Econosto, SE may process the following categories of personal data of current and future contact persons at our customers, suppliers, vendors and partners (each a "**Business Partner**"):

- Contact information, such as full name, work address, work telephone number, work mobile phone number, work fax number and work email address
- Payment data, such as data necessary for processing payments and fraud prevention, including credit/debit card numbers, security code numbers and other related billing information
- Further information necessarily processed in a project or contractual relationship with SE or voluntarily provided by the Business Partner, such as personal data relating to orders placed, payments made, requests, and project details
- Personal data collected from publicly available resources, integrity data bases and credit agencies; and
- If legally required for Business Partner compliance screenings: date of birth, ID numbers, identity cards and information about relevant and significant litigation or other legal proceedings against Business Partners.

Siekmann Econosto may process the personal data for the following purposes:

- Communicating with Business Partners about products, services and projects of SE or Business Partners, e.g. by responding to inquiries or requests or providing you with technical information about purchased products,
- Planning, performing and managing the (contractual) relationship with Business Partners e.g. by performing transactions and orders of products or services, processing payments, performing accounting, auditing, billing and collection activities, arranging shipments and deliveries, facilitating repairs and providing support services,
- Administrating and performing customer surveys, marketing campaigns, market analysis, sweepstakes, contests or other promotional activities or events,
- Maintaining and protecting the security of our products, services and websites, preventing and detecting security threats, fraud or other criminal or malicious activities,
- Ensuring compliance with (i) legal obligations (such as record keeping obligations), export control and customs, (ii) Business Partner compliance screening obligations (to prevent white-collar or money laundering crimes), and (iii) SE policies or industry standards and
- Solving disputes, enforce our contractual agreements and to establish, exercise or defend legal claims.

The legal basis for Siekmann Econosto processing data about you is that such processing is necessary for the purposes of:

- SE exercising its rights and performing its obligations in connection with any contract we make with you (Article 6 (1) (b) General Data Protection Regulation),
- Compliance with SE's legal obligations (Article 6 (1) (c) General Data Protection Regulation) and/or
- Legitimate interests pursued by SE (Article 6 (1) (f) General Data Protection Regulation).

Generally, the legitimate interest pursued by Siekmann Econosto in relation to our use of your personal data is the efficient performance or management of our business relationship with you.

In some cases, we may ask if you consent to the relevant use of your personal data. In such cases, the legal basis for Siekmann Econosto processing that data about you may (in addition or instead) be that you have consented (Article 6 (1) (a) General Data Protection Regulation).

2. Processing of personal data related to your use of our websites, applications and online platforms

Categories of personal data processed, purpose of the processing and legal basis

When visiting Siekmann Econosto's websites, applications or online tools (each a "SE Online Offering"), SE may process the following personal data about you:

- Information that is automatically sent to us by your web browser or device, such as your IP-address, device type, browser type, referring site, sites accessed during your visit, the date and time of each visitor request and
- Personal data that you actively and voluntarily provide via the SE Online Offering (e.g., when registering, contacting us with your inquiries or participating in surveys etc.), including name, e-mail address, telephone number, information submitted as part of a support request, comments or forum posts, etc.

We process your personal data for the following purposes:

- To provide the SE Online Offering's services and functions and to administer your use of the SE Online Offering,
- To verify your identity (if you registered for a SE Online Offering),
- To answer and fulfill your specific requests and
- As reasonably necessary to enforce the applicable terms of use, to establish or preserve a legal claim or defense, to prevent fraud or other illegal activities including attacks on SE's information technology systems.

The legal basis for Siekmann Econosto processing data about you is that such processing is necessary for the purposes of:

- SE exercising its rights and performing its obligations in connection with any contract we make with you (Article 6 (1) (b) General Data Protection Regulation)
- Compliance with SE's legal obligations (Article 6 (1) (c) General Data Protection Regulation) and/or
- Legitimate interests pursued by SE (Article 6 (1) (f) General Data Protection Regulation). Generally, the legitimate interest pursued by SE in relation to our use of your personal data is the efficient performance or management of your use of the SE Online Offerings.

In some cases, we may ask if you consent to the relevant use of your personal data. In such cases, the legal basis for SE processing that data about you may (in addition or instead) be that you have consented (Article 6 (1) (a) General Data Protection Regulation).

Cookies

We may use cookies within SE Online Offerings. You can find information on Siekmann Econosto's use of cookies in our Cookie Notice. The Cookie Notice also provides information on how to block and object to the use of cookies and the processing of data collected by cookies.

Links to other websites

This Privacy Notice applies only to SE Online Offerings and not to other websites or applications operated by third parties. We may provide links to other websites and applications which we believe may be of interest to you. Siekmann Econosto is not responsible for the privacy practices of such other websites or applications.

Facebook Fanpage

On our website we use a link to our Facebook fan page. Jointly responsible for the operation of our Facebook fan pages is Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. The data protection officer can be reached via the contact form or by post at the above address. Facebook Inc, is the American parent company of Facebook Ltd.

The purpose and legal basis of processing data

You can access our social media fan pages regularly at any time on the Internet, regardless of whether or not you have created a user account on the platform in question. If you are logged in to your facebook account, facebook can assign this to your facebook account. In both cases, however, your data will be processed by the internet platforms of the social network. Every time you access the social media platform, your IP address is recorded and saved. In addition, a cookie is usually set on your site, which stores your visit and other data about your visit to the social media platform. Please note that we have no influence on the collection of data and its further use by the social networks. For example, there is no knowledge of the extent to which, where and for how long the data is stored, to what extent the networks comply with existing deletion obligations, what evaluations and links are made with the data and to whom the data is passed on. When calling up our facebook fan pages, your data will be transferred to the USA.

Contact requests and visitor activity

If you contact us through facebook messenger to inform yourself about our services or to share your feedback, we process your personal data on the basis of our legitimate interest in responding to your request in accordance with Article 6 Para. 1 f) GDPR and, if applicable, Article 6 Para. 1 b) GDPR, if your request is aimed at the conclusion of a contract. Usually, we receive the following data from you:

- name, first name,
- gender,
- age, place of residence (if they are public),
- information that you provide in your message or comment to us,
- if you have responded to our post and type of response, or you have shared or commented on it.

The data will be deleted as soon as they are no longer required for the purpose of their collection and no legal obligations to retain them exist. For the personal data from Facebook messages, this is the case when the respective conversation with the user has ended. The conversation ends when it is clear from the circumstances that the matter in question has been finally clarified.

LinkedIn

Our website makes use of functions from the LinkedIn network. The provider here is LinkedIn Ireland Unlimited Company Wilton Place, Dublin 2, Ireland. Each time that you access one of our sites, which contains the LinkedIn functions, a connection is established with the LinkedIn servers. LinkedIn is informed that you have visited our Internet sites with your IP address. If you click on LinkedIn's "Recommend" button and are logged into your LinkedIn account, LinkedIn is able to assign your visit to our Internet site to you and your user account. We would point out that we as the provider of the sites do not know the content of the data that is transmitted or how LinkedIn uses this.

You can find more information on this in data privacy declaration of LinkedIn at:

<https://www.linkedin.com/legal/privacy-policy>.

Instagram

We present ourselves on the social media platform Instagram. The Instagram service is a Facebook product provided by Facebook Ireland Limited. Jointly responsible for the operation of our Instagram custom pages is Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. The Privacy Officer can be contacted using the contact form or by post at the above address. When calling up our Instagram Fan pages, Instagram collects personal data of the users. Such data collection by Instagram may also occur with visitors who are not logged in or registered with Instagram. Further information on the scope and processing of your personal data by Instagram can be found in privacy policy from Instagram.

We receive anonymous statistics on the use and utilization of the fan pages from Instagram due to the legitimate interest according to Article 6 Para. 1 f) GDPR. The following information is provided:

- follower: Number of people who follow us - including growth and development over a defined period of time,
- reach: Number of people who see a specific contribution. Number of interactions on a contribution,
- ad performance: How many people were reached with a contribution or a paid ad and have interacted with it?

We use these statistics, from which we cannot draw conclusions about individual users, to constantly improve our presence on Instagram and to better respond to the interests of our users. We cannot link the statistical data with the profile data of our fans. We receive personal data via Instagram if you actively communicate this to us via a personal message on Instagram. We use your data (e.g., first name, surname) to answer your request and in case of follow-up questions. The processing of personal data in this case serves us to process your contact and in case of follow-up questions. The legal basis for the processing of the data is our legitimate interest in answering your request in accordance with Article 6 Para. 1 f) GDPR and, if applicable, Article 6 Para. 1 b) GDPR, if your request is aimed at the conclusion of a contract. The data will be deleted by us as soon as they are no longer required for the purpose of their collection and no legal obligations to retain them exist, or when the respective conversation with the user has ended. The conversation is terminated when it can be concluded from the circumstances that the matter in question has been finally clarified.

3. Transfer and disclosure of personal data

Siekmann Econosto may transfer your personal data to

- other SE or Group companies in connection with your use of the SE Online Offerings or our business relationship with you,
- third parties which provide IT services to Siekmann Econosto and which process such data only for the purpose of such services (e.g., hosting or IT maintenance and support services), and
- courts, arbitration bodies, law enforcement authorities, regulators or attorneys if necessary, to comply with the law or for the establishment, exercise or defense of rights or legal claims.

Sometimes the recipients to whom Siekmann Econosto transfers your personal data are located in countries in which applicable laws do not offer the same level of data protection as the laws of your home country.

In such cases, Siekmann Econosto takes measures to implement appropriate and suitable safeguards for the protection of your personal data. In particular:

- We share your personal data with SE or Group companies in such countries only if they have implemented the (i) SE-Data Protection Policy or (ii) Binding Corporate Rules („BCR“) of the Group for the protection of personal data,
- We transfer personal data to external recipients in such countries only if the recipient has (i) entered into EU Standard Contractual Clauses with SE, (ii) implemented Binding Corporate Rules in its organization or (iii) – in case of US recipients – the recipient is certified under the Privacy Shield.

You may request further information about the safeguards implemented in relation to specific transfers by contacting dataprotection@siekmann-econosto.de.

Personal data published by you on SE Online Offerings (such as chat rooms or forums) may be globally accessible to other registered user of the respective SE Online Offering.

4. Retention Periods

Unless indicated otherwise at the time of the collection of your personal data (e.g., within a form completed by you), we erase your personal data if the retention of that personal data is no longer necessary (i) for the purposes for which they were collected or otherwise processed, or (ii) to comply with legal obligations (such as retention obligations under tax or commercial laws).

5. Withdraw consent

In case you declared your consent for the processing of certain personal data by Siekmann Econosto, you have the right to withdraw the consent at any time with future effect, e.g., the withdrawal of the consent does not affect the lawfulness of processing based on the consent before its withdrawal. If the consent is withdrawn, Siekmann Econosto may only further process the personal data where there is another legal ground for the processing.

6. Your rights

Under applicable data protection law, you may have the right to:

- Obtain from Siekmann Econosto confirmation as to whether or not personal data concerning you are being processed, and where that is the case, access to the personal data,
- Obtain from SE the rectification of inaccurate personal data concerning you,
- Obtain from SE the erasure of your personal data,
- Obtain from SE restriction of processing regarding your personal data,
- Data portability concerning personal data, which you actively provided; and
- Object on grounds relating to your particular situation, to processing of personal data concerning you.

7. Data Privacy Contact

The Siekmann Econosto **Data Protection Organization** provides support with any data privacy related questions, comments, concerns, or complaints or in case you wish to exercise any of your data privacy related rights.

The SE Data Protection Organization may be contacted at: dataprotection@siekmann-econosto.de.

The SE Data Protection Organization will always use best efforts to address and settle any requests or complaints you bring to its attention. Besides contacting the SE Data Protection Organization, you always have the right to approach the competent data protection authority with your request or complaint.

A list and contact details of local data protection authorities is available [here](#).

Dortmund, June 2021