

Data Protection Policy

A. General information:

Clause 1

Name and contact details of the controller

This data protection policy provides information about the processing of personal data on the website of the company Huesecken Wire GmbH

Controller:

Huesecken Wire GmbH

Nimmertal 120

58119 Hagen

Germany

Tel.: +49 (0) 2334 919 70

Email: datenschutz@huesecken.de

Contact details for the data protection officer:

Beate Kemper

c/o NH IT Services GmbH

Lange Str. 19

58636 Iserlohn

Germany

The company's data protection officer can be reached at the above company address and at datenschutz@nh-it-services.de.

Clause 2

Your rights as a data subject

Rights of the data subject

You have the right:

- under Art. 15 GDPR to request information about the personal data we process about you. In particular, you can request information in relation to the purposes of the processing, the categories of personal data, the categories of recipient to whom your personal data has been or will be disclosed, the envisaged period for which data will be stored, the existence of a right to rectification, erasure, restriction of processing or to object, the existence of a right to lodge a complaint, the origin of your data, insofar as it was not collected by us, and the existence of automated decision-making including profiling and, where applicable, meaningful information on the details of these;

- under Art. 16 GDPR to require the immediate rectification or completion of inaccurate personal data we store about you;
- under Art. 17 GDPR to request erasure of the personal data we store about you, insofar as the processing is not necessary for exercising the right of freedom of expression and information, for compliance with a legal obligation, for reasons of public interest or for the establishment, exercise or defence of legal claims;
- under Art. 18 GDPR to request restriction of processing of your personal data, where you contest the accuracy of the data, the processing is unlawful, but you oppose the erasure of the data, and we no longer need the data, but you require it for the establishment, exercise or defence of legal claims or you have objected to the processing pursuant to Art. 21 GDPR;
- under Art. 20 GDPR the right to receive your personal data, which you have provided to us, in a structured, commonly-used and machine-readable format or to request its transmission to another controller;
- under Art. 7 GDPR to withdraw any consent that you have given to us at any time. This has the consequence that we will no longer be able to continue the data processing based on such consent in future; and
- under Art. 77 GDPR to lodge a complaint with a supervisory authority. In order to do so, you can generally approach the supervisory authority in your habitual place of residence or place of work or at the place where we have our registered office.

Clause 3

Right of objection

To the extent that your personal data is being processed on the basis of legitimate interests pursuant to Art. 6(1)(1)(f) GDPR, you have the right under Art. 21 GDPR to object to the processing of your personal data, to the extent that there are grounds for this relating to your particular situation, or you object to processing for direct marketing purposes. In the case of the latter you have a general right to object that will be implemented by us without the need to provide details of any particular situation.

B. Data processing on this website:

Clause 4

Exercise of your rights of objection and withdrawal

If you would like to make use of your rights of withdrawal or object, simply send an email to: datenschutz@huesecken.de

Clause 5

Scope and purpose of personal data processing

5.1 On accessing the website

Upon accessing this website, data is automatically sent to the server of this website by the internet browser used by the visitor and stored for a limited period in a log file. The following data is stored until automatic deletion without further input by the visitor:

- IP address of the visitor's terminal device;
- date and time of access by the visitor;
- name and URL of the pages accessed by the visitor;
- website from which the visitor arrived at the company's website (so-called referrer URL);
- browser and operating system of the visitor's terminal device as well as the name of the access provider used by the visitor.

The processing of this personal data is justified under Art. 6(1)(1)(f) GDPR. The company has a legitimate interest in the data processing for the purposes of:

- establishing the connection to the website quickly;
- making the website user-friendly;
- detecting and guaranteeing the security and stability of the system; and
- simplifying and improving the administration of the website.

The processing is strictly not carried out for the purposes of discovering the identity of visitors.

5.2 Upon using our options for getting in touch

It is possible to contact us via the email address provided. In this case, the personal data you provide by email will be stored by us.

In this context, there is no forwarding of data to third parties. The data is used exclusively for processing the conversation. The data processing for the purposes of establishing contact is carried out under Art. 6(1)(1)(a) GDPR on the basis of your consent provided voluntarily.

The personal data provided by email for the purposes of establishing contact are deleted automatically after your request has been dealt with.

You have the option to withdraw your consent to the processing of personal data at any time.

In such a case, the conversation cannot be continued.

In order to exercise your right to withdraw consent, simply send us an email.

All personal data, which has been stored in the course of contact, will be deleted in this case.

Clause 6

Forwarding of data

Personal data will be transferred to third parties if:

- consent to do so has been expressly provided by the data subject under Art 6(1)(1)(a) GDPR;
- disclosure pursuant to Art. 6(1)(1)(f) GDPR is necessary for the establishment, exercise or defence of legal claims and there is no reason to believe that the data subject has an overriding legitimate interest for their data not to be disclosed;
- the data transfer is based on a legal obligation pursuant to Art. 6(1)(1)(c) GDPR; and/or
- it is necessary under Art. 6(1)(1)(b) GDPR for the performance of a contract with the data subject.

In no other cases will personal data be transferred to third parties.

C. Data processing within the scope of job applications

Clause 7

Collection and storage of personal data as well as nature and purpose and its use

We store all information provided to us by people who apply for a job in our company. This applies both to applications for specific advertised jobs and to speculative applications. The data will be stored for six months after the end of the application process. The application will be checked within this time and the information will be available until the expiry of the storage period in order to be able to provide a qualified answer to subsequent enquiries (e.g. requests for documents, rejections). No data will be collected by third parties in the course of job application procedures unless the applicant has provided their consent. No data is transferred to third parties, and especially not to another country.

If the application leads to the formation of a training or employment relationship, the data will be stored for ten years unless other regulations provide for a longer retention period. Applicants are then required to provide further data for the formation of an employment relationship, e.g. social security information. As a result, data will be transferred to the social security institutions and the tax authorities.

The legal bases for the collection of data are Art. 6(1)(f) GDPR and section 26(1) of the German Federal Data Protection Act (*BDSG neu*) as well as other statutory provisions giving rise to storage obligations in the event of formation of an employment relationship.

Clause 8

Supplementary information about the rights of the data subject

A request for erasure leads to the end of the application procedure and, as a result, no more information can be provided about the conduct of the procedure.

After the formation of an employment relationship, the right to erasure of data or limitation of processing is reduced. Statutory and/or contractual provisions on documentation and archiving take precedence over requests for erasure. The data subject may approach the responsible

person in the company specified above, the company's data protection officer or the supervisory authority in order to assert their rights.

D. Data processing in the course of a business relationship

Clause 9

Collection and storage of personal data as well as nature and purpose and its use

During the course of the business relationship with us, we process your personal data that falls within the following data categories:

- Name/company;
- Occupation/job title/line of business;
- Contact person;
- Business address and other addresses of business partners;
- Contact details (telephone number, fax number, email address, etc.);
- Bank details;
- Order details;
- VAT registration number;
- Company registration number;
- Service requests;
- Sales figures.

We process this data on the basis of Articles 6(1)(b), (c) and (f) GDPR.

In particular, we need the data provided by you for the performance of contractual obligations and to carry out pre-contractual steps, such as providing a quote. Without this data, we are unable to enter into a contract with you and perform it.

Your personal data will be stored by us in connection with a business transaction for as long as we consider it necessary to achieve the aims specified above and this is permitted under the applicable law. Otherwise, we store your personal data for as long as the statutory duties of retention require, e.g. under the German Commercial Code (*HGB*) and the German Tax Code (*AO*), or until the limitation period for any potential legal claims has expired.

You have provided us with the data about yourself voluntarily and we process this data for our own advertising purposes, for example to send out newsletters, and for the purposes of making reference to the existing or previous business relationship with the business partner (testimonial reference) on the basis of Art. 6(1)(f) GDPR.

Clause 10

Forwarding of data to third parties

Transmission of your personal data to third parties does not take place other than for the purposes set out below.

Your personal data will be passed on to third parties in accordance with Art. 6(1)(1)(b) GDPR where it is necessary for the performance of a contractual relationship with you. In particular, this includes disclosure to logistics suppliers for the purposes of shipping. The data which is passed on may only be used by the third party for the specified purpose.

E. Updates and amendments to this data protection policy

This data protection policy is currently applicable and is the version dating from April 2020.

It may be necessary to amend this data protection policy due to the further development of our website and services or on the basis of changed legal or administrative provisions. You can access and print out the currently applicable Data Protection Policy at any time at <http://www.horlewire.com> or www.huesecken.de.