

Information on data protection regarding our data processing in accordance with Articles (Art.) 13, 14 and 21 of the Basic European Data Protection Regulation (EU-DSGVO)

We take European Data Protection seriously and hereby inform you how we process your data, and which claims and rights you are entitled to according to the data protection regulations. Valid from 25 May 2018.

1. Authority responsible for data processing:

Gaplast GmbH
Wurmansauer Straße 22
82442 Saulgrub-Altenau
+49 8845-74130
info@gaplast.de

Data Protection Officer:

Gaplast GmbH
Data Protection Officer
Wurmansauer Straße 22
82442 Saulgrub-Altenau
+49 8845-7413649
datenschutz@gaplast.de

2. Purposes and legal basis on which we process your data

We process personal data in accordance with the provisions of the Basic European Data Protection Regulation (EU-DSGVO), the Federal Data Protection Act (BDSG revised version.) and other applicable data protection regulations (details below). Which data is processed and how it is used depends largely on the services requested or agreed in each case. Further details or additions to the purposes of data processing can be found in the respective contract documents, forms, a declaration of consent and / or other information provided to you (e.g. in the context of using our website or our terms and conditions). Furthermore, this data protection information may be updated from time to time, as you can see on our website www.gaplast.de

2.1. Purposes for the performance of a contract or pre contractual measures pursuant to (Art. 6 para. 1 b EU-DSGVO)

The processing of personal data is carried out to execute our contracts with you and to carry out your orders and to of measures and activities in the context of pre-contractual relations, e.g. with interested parties.

In particular, the processing thus serves the provision of services in accordance with your orders and includes the measures and activities necessary for this. This essentially includes contract related communication with you, the verifiability of transactions, orders and other agreements as well as quality control by means of appropriate documentation, goodwill procedures, measures for the control and optimization of business processes as well as for the fulfillment of general duties of care, control and monitoring by affiliated companies (e.g. parent company); statistical evaluations for corporate management, cost recording and controlling, reporting, internal and external communication, emergency management, billing and tax evaluation of operational services, risk management, assertion of legal claims and defense in legal disputes; ensuring IT security (including system or plausibility tests) and general security, including building and plant security, ensuring

and exercise of domestic authority (e.g. through access controls); ensuring the integrity, authenticity and availability of data, prevention and investigation of crimes; control by supervisory bodies or control authorities (e.g. auditing).

2.2. Purposes within the scope of a legitimate interest of us or third parties (Art. 6 para. 1 f EU-DSGVO)

Beyond the actual fulfilment of the contract or preliminary contract, we may process your data if necessary, to protect legitimate interests of us or third parties, in particular for purposes:

- Advertising or market and opinion research, provided that you have not objected to the use of your data
- The obtaining of information and data exchange with credit agencies, insofar as this exceeds our economic risk, the examination and optimization of procedures for the analysis of requirements
- The further development of services and products as well as existing systems and processes
- The disclosure of personal data as part of due diligence in the course of company sales negotiations
- For comparison with European and international anti terrorism lists, insofar as this goes beyond the legal obligations
- The enrichment of our data, including the use or research of publicly available data
- Statistical evaluations or market analysis
- Benchmarking
- The assertion of legal claims and defense in legal disputes which are not directly attributable to the contractual relationship
- The limited storage of data, if deletion is not possible or only possible with disproportionately high effort due to the special type of storage
- The development of scoring systems or automated decision making processes
- The prevention and clarification of criminal offences, insofar as not exclusively for the fulfilment of legal requirements
- Building and plant security (e.g. through access controls and video surveillance), insofar as this goes beyond the general duty of care
- Internal and external investigations, security checks
- The possible listening in or recording of telephone conversations for quality control and training purposes
- Obtaining and maintaining certifications of a private or official nature
- The securing and exercising of the householder's rights through appropriate measures as well as through video surveillance for the protection of our customers and employees and for securing evidence in the event of criminal offences and their prevention

2.3. Purposes within the scope of your consent (Art. 6 para. 1 a EU-DSGVO)

A processing of your personal data for certain purposes (e.g. use of your e-mail address for marketing purposes) can also be carried out with your consent. As a rule, you can revoke this at any time. This also applies to the revocation of declarations of consent that were issued to us before the EU-DSGVO came into force, i.e. before 25 May 2018. You will be informed separately about the purposes and consequences of revocation or failure to grant consent in the corresponding text of the consent. As a general rule, the revocation of a consent is only effective for the future. Processing that took place before the revocation is not affected and remains lawful.

2.4. Purposes to meet legal requirements (Art. 6 para. 1 c EU-DSGVO) or in the public interest (Art. 6 para. 1 e EU-DSGVO)

Like everyone who is involved in the economic process, we are also subject to a variety of legal obligations. These are primarily legal requirements (e.g. commercial and tax laws), but also, where applicable, regulatory or other official requirements. The purposes of processing may include identity and age verification, fraud and money laundering prevention, the prevention, combating and clarification of the financing of terrorism and asset endangering criminal offences, comparisons with European and international anti terrorist lists, the fulfilment of tax law control and reporting obligations and the archiving of data for data protection and data security purposes as well as audits by tax and other authorities. In addition, the disclosure of personal data may become necessary within the scope of official/judicial measures for the purpose of gathering evidence, criminal prosecution or the enforcement of civil law claims.

3. The categories of data processed by us, if we do not receive data directly from you, and their origin.

Insofar as this is necessary for the provision of our services, we process personal data permissibly received from other companies or other third parties (e.g. credit agencies, address publishers). In addition, we process personal data that we have permissibly taken, received or acquired from publicly accessible sources (such as telephone directories, commercial and association registers, registration registers, debtor registers, land registers, press, Internet and other media) and may process them.

Relevant categories of personal data may be in particular:

- Personal data (name, date of birth, place of birth, nationality, marital status, profession, industry and comparable data)
- Contact details (address, e-mail address, telephone number and similar data)
- Address data (reporting and comparable data)
- Confirmation of payment cover with banks and credit card providers.
- Information about your financial situation (creditworthiness data including scoring, i.e. data for assessing the economic risk)
- Customer history
- Data on your use of the Telemedia offered by us (e.g. time of access to our websites, apps or newsletter, pages/links clicked on by us or entries and comparable data)
- Video Data

4. Recipients or categories of recipients of your data

Within our company, those internal departments or organizational units receive your data which require them to fulfil our contractual, pre contractual and legal obligations or within the scope of processing and implementing our legitimate interests. Your data will only be passed on to external parties

- In connection with the execution of the contract e.g. passing on to trading partners;
- For the purposes of fulfilling legal requirements according to which we are obliged to provide information, report or pass on data or if the passing on of data is in the public interest (cf. section 2.4); insofar as external service companies process data on our behalf as processors or function providers (e.g. external computer centers, support / maintenance of EDP / IT applications, archiving, document processing, call center services, compliance services, controlling data screening for anti money laundering purposes, data validation or

plausibility checks, data destruction, purchasing/procurement, customer management, marketing, media technology, research, risk controlling, accounting, telephony, website management, auditing services, credit institutions, printers or companies for data disposal, courier services, logistics);

- On the basis of our legitimate interest or the legitimate interest of the third party for purposes within the scope of the purposes mentioned in No. 2.2 (e.g. to authorities, credit agencies, collection agencies, lawyers, courts, experts, companies belonging to the Group and committees and supervisory bodies);
- If you have given us your consent to transfer the data to third parties.

We will not pass on your data to third parties beyond this. If we commission service providers within the scope of order processing, your data is subject to the same security standards there as with us. In all other cases, the recipients may only use the data for the purposes for which it was transmitted to them

5. Duration of the storage of your data

We process and store your data for the duration of our business relationship. This also includes the initiation of a contract (pre contractual legal relationship) and the processing of a contract. In addition, we are subject to various storage and documentation obligations, which result from the German Commercial Code (HGB) and the German Fiscal Code (AO), among others. The periods of retention and documentation stipulated there are up to ten years beyond the end of the business relationship or the pre contractual legal relationship.

Furthermore, special legal regulations may require a longer period of retention, such as the preservation of evidence within the framework of the statutory limitation rules. According to §§ 195 ff. of the German Civil Code (BGB), the regular limitation period is three years; it but limitation periods of up to 30 years may also be applicable.

If the data are no longer necessary for the fulfilment of contractual or legal obligations and rights, they will be regularly deleted, unless their temporary further processing is not necessary for the fulfilment of the purposes listed under point 2.2

Necessary for an overriding legitimate interest. Such an overriding legitimate interest also exists, for example, if deletion is not possible or only possible with disproportionately high expense due to the special type of storage and processing for other purposes is excluded by suitable technical and organizational measures.

6. Processing of your data in a third country or by an international Organization

Data will be transferred to countries outside the European Union (EU) or the European Economic Area (EEA) (so called third countries) if it should be necessary to carry out an order/contract from or with you, or if it is required by law (e.g. tax reporting obligations), if it is in the scope of a legitimate interest of us or a third party, or if you have given us your consent. The processing of your data in a third country may also take place in connection with the involvement of service providers in the context of order processing. Unless the EU Commission has decided on an adequate level of data protection in the country in question, we will ensure that your rights and freedoms are adequately protected and guaranteed in accordance with EU data protection regulations by means of appropriate agreements. We will provide you

with detailed information on request. Information on suitable or appropriate guarantees and on the possibility of obtaining a copy from you can be obtained from the Data Protection Officer on request.

7. Your privacy rights

- You have the right to receive information from us about your data stored with us according to the rules of Art. 15 EU-DSGVO (if necessary, with restrictions according to § 34 BDSG revised version).
- At your request, we will correct the data stored about you in accordance with Art. 16 EU-DSGVO if it is incorrect or inaccurate.
- If you so wish, we will delete your data in accordance with the principles of Art. 17 EU-DSGVO, provided that other legal regulations (e.g. legal storage obligations or the restrictions according to § 35 BDSG revised version) or an overriding interest on our part (e.g. to defend our rights and claims) do not conflict with this.
- Taking into account the requirements of Art. 18 EU-DSGVO, you can demand that we restrict the processing of your data.
- Furthermore, you may object to the processing of your data in accordance with Art. 21 EU-DSGVO, on the basis of which we must stop processing your data. However, this right of objection only applies if there are very special circumstances of your personal situation, whereby our company's rights may conflict with your right of objection.
- You also have the right to receive your data in a structured, common and machine-readable format under the conditions of Art. 20 EU-DSGVO or to transfer it to a third party.
- In addition, you have the right to revoke your consent to the processing of personal data at any time with effect for the future (see item 2.3).
- You may at any time submit a complaint to the supervisory authority responsible for you (Art. 77 EU-DSGVO). Your competent supervisory authority depends on the federal state of your residence. A list of the supervisory authorities (for the non-public sector) with their addresses can be found at: https://www.bfdi.bund.de/DE/Infothek/Anschriften/Links/anschriften_links-node.html
- However, we recommend that you always address a complaint to our data protection officer first.

8. Scope of your obligations to provide us with your data

You only need to provide the data that is necessary for the establishment and execution of a business relationship or for a pre contractual relationship with us, or to collection we are legally bound. Without this data we will usually not be able to conclude or execute the contract. This may also refer to data required later within the scope of the business relationship.

If we request additional data from you, you will be informed separately of the voluntary nature of the information.

9. The existence of automated decision making in individual cases (including profiling)

We do not use purely automated decision-making procedures in accordance with Article 22 EU-DSGVO one. Should we nevertheless use such a procedure in individual cases in the future, we will separately, if this is required by law. Under certain circumstances we process.

Your data partly with the aim of evaluating certain personal aspects (profiling).

In order to be able to inform and advise you about products in a targeted manner, we may use evaluation tools. These enable us to tailor product design, communication and advertising, including market and opinion research. Such methods can also be used to assess your creditworthiness and solvency as well as to combat money laundering and fraud. So called "score values" can be used to assess your creditworthiness and solvency. Scoring involves calculating the probability using mathematical procedures with which a customer will meet his payment obligations in accordance with the contract. Such score values thus support us, for example, in the assessment of creditworthiness, decision making in the context of product contracts and are incorporated into our risk management. The calculation is based on mathematically and statistically recognized and proven procedures and is carried out on the basis of your data, in particular income, expenditure, existing liabilities, occupation, employer, length of employment, experience from the previous business relationship, contractual repayment of previous loans and information from credit agencies. The following are not processed.

Information on nationality and special categories of personal data in accordance with Art. 9 EU-DSGVO