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# Information sheet pursuant to Art. 13

## EU General Data Protection Regulation (GDPR) CeoTronics AG

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**Below you will find an overview of the collection, processing and use of your data.**

CeoTronics AG takes the protection of your personal data very seriously and processes it in accordance with the applicable statutory data protection requirements.

### **What is personal data?**

Personal data is all information that may relate to you personally (e.g. surname, first name, address, etc.).

### **What is included in this letter?**

The following information will give you an overview of the processing of your personal data, which is collected, processed and used by us and on the basis of your data protection rights. Which individual data is collected, processed and used by you depends on the services requested or agreed in each case.

Please also pass on the information contained in the letter to all current or future authorized representatives who may use the services/products of CeoTronics AG.

## 1. Who is responsible for data collection, processing and use and who can I contact?

Data controller:

CeoTronics AG  
Adam-Opel-Straße 6  
63322 Rödermark, Germany  
Phone: +49 (0)6074/8751-0  
Email: [datenschutz@ceotronics.com](mailto:datenschutz@ceotronics.com)

You can contact our external Data Protection Officer at:

wavesun-technologies  
Patrick Baker  
At Lerchenberg 15  
63322 Rödermark, Germany  
Phone: +49 (0)6074/3709395  
Email: [info@wavesun-technologies.de](mailto:info@wavesun-technologies.de)

## 2. Which sources and data do we use and according to which categories are the personal data processed?

We process personal data which we receive from our customers, interested parties, service providers and suppliers in the context of our business relationships. In addition, we process personal data – should this be necessary for the provision of our services – that we permissibly obtain from publicly accessible sources or that is transmitted to us by other companies within CeoTronics AG or by other third parties (e.g. credit agencies).

The following categories of data are processed by us:

- **Master data:**  
e.g. name, first name and department of the contact person, company name, address, telephone, fax and e-mail.
- **Order data:**  
e.g. company name, address, contact person
- **Data for the fulfillment of our contractual obligations:**  
e.g. contract billing and payment data
- **Correspondence (correspondence with you)**
- **Communication data**
- **Advertising and sales data**
- **Planning and control data**
- **Other data comparable with the above categories**

### 3. For what purpose and on what legal basis do we process the data?

We process the aforementioned personal data in compliance with the applicable statutory data protection requirements. Processing shall be lawful if at least one of the following conditions is met:

#### a.) Based on your consent (article 6, para. 1 lit a of the GDPR)

If you have given us permission to process your personal data for specific purposes (e.g. passing on data within the company, using the data for marketing purposes). Your consent is voluntary and can be revoked at any time with effect for the future. This also applies to the revocation of declarations of consent given to us before 2018-05-25.

#### b.) In order to fulfill contractual obligations or to carry out pre-contractual measures (Art. 6. para. 1 lit. b of the GDPR)

We process data so that we can fulfill our contractual obligations to provide services for our customers or to carry out pre-contractual measures, which take place on request. The purposes of data processing result primarily from the concrete service/product and can include, among other things, needs analyses and consultations. Further details regarding data processing purposes can be found in the contract documents and General Terms and Conditions.

#### c.) Based on legal requirements (article 6, para. 1 lit c of the GDPR)

CeoTronics AG is subject to various legal obligations, which entails legal requirements (e.g. commercial and tax retention periods in accordance with the German Tax Code and the German Commercial Code). The purposes of processing also include the fulfillment of control and reporting obligations under tax law as well as risk assessment and control within the company.

#### As part of the balancing of interests (article 6, para. 1 (f) of the GDPR)

If necessary, we shall process your data beyond the actual fulfillment of the contract to protect the legitimate interests of the data controller or a third party. Examples are:

- Prevention of criminal offenses
- Measures for building security (e.g. access control)
- Ensuring IT operation and security

- Measures to secure the householder's title
- Advertising (e.g. direct advertising) or market and opinion research, insofar as you have not objected to the use of your data
- Assertion of legal claims and defense in legal disputes
- Consultation of and data exchange with credit agencies

#### **4. Who receives my data? (Categories of recipients of personal data)**

Within CeoTronics AG, the departments that require it to fulfill our contractual and legal obligations have access authorization. CeoTronics AG may also use carefully selected service providers who comply with data protection regulations to obtain data for these purposes. These are mainly companies in the categories:

- Payment transactions
- Settlement
- IT service provider
- Consultation
- Sales and Marketing
- Service providers within the framework of contract processing relationships

When passing on data to other recipients, we may only pass on information about you if this is required by law, if you have consented to the data being passed on or if we are authorized to do so. Recipients of personal data include, but are not limited to

- Public bodies or institutions (e.g. tax authorities, supervisory authorities) in the event of a statutory or official obligation
- Other companies or comparable institutions (e.g. manufacturing companies) to which we transfer your personal data in order to realize business relationships
- Other companies within CeoTronics AG (e.g. CT-Video GmbH)

Other data recipients may be places for which you have given us your consent.

#### **5. Is data transferred to third countries?**

An active transfer of personal data to third countries only takes place if this is necessary for the execution of your orders or is stipulated by law.

## 6. For how long is my personal data stored?

Your personal data will only be stored as long as is necessary for the fulfillment of our contractual and legal obligations.

If the data is no longer necessary for the fulfillment of contractual or legal obligations, it will be deleted regularly unless temporary and limited further processing is necessary for the following purposes:

- Compliance with commercial and tax retention periods: These include the German Commercial Code (HGB) and the German Tax Code (AO). The storage periods stipulated therein are up to 10 years.
- Preservation of evidence within the framework of the legal provisions related to limitation periods. According to articles 195 et seq. of the German Civil Code (BGB), the regular limitation period is three years, and, in special circumstances, up to 30 years.
- Compliance with storage obligations under telecommunications law in accordance with the German Telecommunications Act (TKG) and other laws

## 7. What is the obligation to provide and what are the consequences of not providing data?

As part of our business relationship, you must provide the personal information necessary to establish and conduct a business relationship and to fulfill the contractual obligations associated therewith, or which we are required to collect by law. Without this information, we will generally not be able to enter into or execute the contract with you.

## 8. Is there automated decision making (including profiling)?

In principle, we do not use fully automated decision-making pursuant to article 22 of the GDPR for the establishment and implementation of business relationships. Should we use this procedure in individual cases, we will inform you of this separately if this is required by law.

## 9. What data protection rights do I have?

### You have the following rights:

- pursuant to Art. 7 para. 3 GDPR, you have the right to **revoke** your **consent** at any time with effect for the future. The consequence of this is that we may no longer continue the data processing based on this consent in the future;

- pursuant to Art. 15 GDPR, the right to request free **information** about the personal data processed by us concerning your person;

- pursuant to Art. 16 GDPR, the right to immediately request the **correction of incorrect or incomplete** personal data processed by us;

- pursuant to Art. 17 GDPR, the right to demand the **deletion of** your personal data stored by us, unless processing is necessary to exercise the right to freedom of expression and information, to fulfill a legal obligation, for reasons of public interest or to assert, exercise or defend legal claims;

- pursuant to Art. 18 GDPR, the right to demand the **restriction of the processing of** your personal data if the accuracy of the data is disputed by you, the processing is unlawful but you refuse its deletion and we no longer need the data, but you need it to assert, exercise or defend legal claims, or you have lodged an objection against the processing pursuant to Art. 21 GDPR;

- pursuant to Art. 20 GDPR, the right to receive the personal data you have provided to us in a structured, common and machine-readable format or to request **transmission to another responsible person**; and

- to **complain to a supervisory authority** pursuant to Art. 77 GDPR. As a rule, you can contact the supervisory authority of your usual place of residence or workplace or our company.

**Right of objection (Art. 21 GDPR):**

**As far as the processing of your data for the protection of justified interests takes place, you have the right to object to this processing at any time under our contact details given above if your particular situation gives rise to reasons that prevent this data processing. We will then terminate this processing unless it serves overriding interests worthy of protection on our part.**

**Right to object to the processing of data for direct marketing purposes: In individual cases, we process your personal data in order to instigate direct advertising. You have the right to object to the processing of your personal data for the purpose of such advertising at any time under the contact details given above.**

**If you object to the processing for the purposes of direct marketing, we will no longer process your personal data for these purposes in future.**