

DATA PRIVACY STATEMENT

BUSINESS PARTNERS

For Deloro Wear Solutions GmbH, Zur Bergpflege 51 – 53, 56070 Koblenz, Germany, E-Mail: info@deloro.com (hereafter referred to as „Deloro“) the protection of your personal data during their processing is an important concern.

In the following we clarify therefore, on the basis of our data privacy statement, which personal data of yours and in which way we process it. Please contact us should you have any further questions. Our contact data can be found hereinbefore as well as at the end of this data privacy statement.

Personal Data

Personal data is all information which refers to an identified or identifiable natural person. A natural person who can be directly or indirectly identified, in particular by means of classification of a characteristic such as a name, assignment of an identification number, location data, online-identification or one or more particular attributes, which embody the physical, physiological, genetic, psychological, economic, cultural or social identity of this natural person is viewed as identifiable. This also includes, for example, information such as your name, address, telephone number, email address, payment methods/account information and date of birth.

Purpose of the Processing of Personal Data

During the data processing we handle your personal data responsibly and confidentially. This is why your personal data is of course processed in compliance with the valid national

(in particular Federal Data Protection Act) and European Data Protection Regulations (EU General Data Protection Regulation, hereafter referred to as GDPR).

A processing in this regard of personal data exists in each carried out procedure, with or without the help of automated procedures or in each process series in connection with personal data. A processing of data is especially to be seen as the imposing, gathering, organization, ordering, saving, adjusting, changing, readout, requesting, usage, disclosure by transfer, distribution or in another form to make available, comparison or linking, limiting, deletion or destruction of personal data.

We process your personal data according to the following described specifications and regulations within the framework of an automatic processing fundamentally based on a relevant legal authorization basis.

When we build upon a legal authorization basis, then this is, as a rule, article 6, para. 1, sentence 1, lit. b) GDPR ("Necessity Regarding Contract Fulfillment"). We process your data in particular in order to be able to fulfill the existing contractual relationship.

Deloro processes personal data within the framework of the existing contractual relationship, insofar as this is required. The data processing is carried out in particular in order to identify you as our contractual partner, to be able to conclude and carry out the contract, to correspond with you, to issue invoices and to carry out possible existing liability claims as well as the assertion of any claims.

The personal data compiled directly from you are required for the conclusion of the respective contracts and thereby the contractual relationship. In order to carry out the respective contract, you are contractually obligated to make the required data available. Should you not make the required data available this can lead to a contract fulfillment not being able to be carried out.

In regard to the fulfillment of legal obligations article 6, para. 1, sentence 1, lit. c) GDPR is relevant as authorization basis.

Your personal data, when no legal authorization basis exists, shall be processed when you give your explicit consent, as per article 6, para. 1, sentence 1, lit. a) GDPR in conjunction with article 7 GDPR.

Failure to provide this consent or revocation of consent leaves the possibility of regress on the legal authorization basis, in particular article 6, para. 1, sentence 1, lit. b) GDPR ("Necessity Regarding Contract Fulfillment"), article 6, para. 1, sentence 1, lit c) GDPR ("Legal Obligations") as well as article 6, para. 1, sentence 1, lit. f) GDPR ("Entitled Interest") in regard to the processing of data untouched.

You have the chance to voluntarily submit your declaration of consent. The failure to provide consent or the revocation of consent does not put you at a disadvantage. You may, at any time, demand to see your consent and to revoke consent at any time via email or mail. The revocation of consent does not affect the admissibility of the processing up to the time of revocation. Our contact data can be found above and at the end of this data privacy statement. An automatic decision making in individual cases including profiling as per article 22 GDPR does not take place.

The scope of the processing of your personal data shall be limited by the respective purposes described in this data privacy statement. We, in part, use external service providers for the processing of your data. These have been carefully selected and commissioned by us, are bound to our instructions and are regularly monitored. The requirements set forth in article 28 GDPR are followed.

Duration of Data Processing

The maximum period of time for the processing is dependent upon which purpose the data processing serves. The duration of storage complies with the time period needed to attain the aim of the processing.

The data is additionally stored for the fulfillment of legal requirements (for example commercial and tax law storage obligations as per §257 German Commercial Code, §147 German Tax Code) and there after deleted.

Recipients of Personal Data

We transmit personal data to the specialist departments within Deloro insofar as this is necessary as well as to audit firms, tax consultant firms, law firms, banks, printers, postal service companies, shipping companies, officials (customs among others), insurance companies, credit assessment companies, IT service providers, debt collection agencies and data carrier disposal companies. We commission processors which contribute to the fulfillment of our obligations. These processors are contractually obligated to adhere to the confidentiality as well as to adhere to the regulations of the GDPR, in particular those of article 28 of the GDPR and the Federal Data Protection Act.

Advertising

Deloro intends to also process the data shared by you and the data compiled by us with an existing contractual relationship for advertising purposes. The legal basis for this is, in this case, article 6, para. 1, sentence 1, lit f) GDPR („Entitled Interest“). Such an entitled interest is given according to recitals in GDPR in particular in regard to direct advertising (recital 47 sentence 7). Under the term direct advertising is understood the direct addressing of an enquirer by the provider, in this case by us, with the aim to facilitate the sale of products or services.

The advertising is carried out via mail, electronically (email), per text/video messaging or per telephone. The requirements of § 7 Law Against Unfair Competition are naturally adhered to. The advertising measures apply to newsletters, info letters, invitations and announcements to events by Deloro.

You can, at any time, object to the processing of your personal data for advertising purposes. The corresponding contact data is listed at the end of this data privacy statement. In this case your personal data will no longer be processed for advertising purposes and deleted from the advertising distribution lists.

Location of the Data Processing Measures

The entire processing of your personal data takes place either in Germany or in a member country of the European Union. A use of your personal data by Deloro in countries outside of the member countries of the European Union (so-called third countries) does not occur. Insofar as a data processing should take place in a third country all requirements of article 44 ff. GDPR shall be adhered to.

Security / Technical and Organizational Measures

We meet all necessary technical and organizational measures under the consideration of the regulations

of article 24, 25 and 32 of the GDPR in order to protect your personal data from loss, destruction, access, change or processing by unauthorized persons and misuse.

We thereby adhere to the legal regulations of pseudonymization and encryption of personal data, confidentiality, integrity and resilience of the system and services in connection with the processing, the availability of personal data and the possibility these, in the case of a physical or technical accident, to promptly recover as well as to the establishment of a process for the regular monitoring, assessment and evaluation of the effectiveness of the technical and organizational measures for the warranty of the security or processing.

Furthermore we also adhere to the regulations of article 25 of the GDPR with regard to the basic principle of “privacy by design” (data protection through technical design) and “privacy by default” (data protection through data protective friendly presets).

Obligation to Provide Data

In the context of our business relationship, we require the following personal data from you:

- data necessary for the establishment and conduct of a business relationship;
- data necessary for the performance of the related contractual obligations; and
- data that we are legally required to collect.

Without such personal data, we will not be in a position to enter into, or perform, a contract with you.

Your Rights

You have the right to information free of charge regarding your personal data as well as, with the submission of the legal requirements, the right to correction and deletion or your data, limitation of the processing, data transferability as well as the right to objection.

You also have the possibility to complain to the responsible supervisory authorities. Should you have questions about the processing of your personal data as well as questions

regarding the above mentioned rights, similarly as with comments, please contact us under the aforementioned contact data or by way of our external data protection officer:

DORNBACH GmbH Rechtsanwaltschaftsgesellschaft

Anton-Jordan-Straße 1

56070 Koblenz

E-Mail: datenschutz@dornbach.de

Herr Dr. Alexander Birkhahn

Tel.: 0261 9431 134

Data Controller

Deloro Wear Solutions GmbH

Zur Bergpflege 51 - 53

56070 Koblenz, Germany

E-Mail: info@deloro.com

// End of Document