

Privacy Statement

Our privacy statement is structured as follows:

1. Information about us as the responsible party
2. Use of personal data
3. Rights of users and parties concerned
4. Information on data processing
5. Updating and amendment of this privacy statement

1. Information about us as the responsible party

The responsible party in terms of data protection legislation of member states of the European Union as well as other regulations concerning data protection is:

Schmalenberger GmbH + Co. KG
represented by the personally liable "Maschinen und Apparatebau-Geschäftsführungs GmbH"
CEO: Dietmar Rogg (Dipl. Kfm.)
Im Schelmen 9-11
72072 Tübingen
Germany
Tel.: +49 (0)70 71/70 08 0
Fax: +49 (0)70 71/70 08 14
E-mail: info@schmalenberger.de

The data protection body of the responsible party is:

ER Secure GmbH
In der Knackenu 4
82031 Grünwald
Germany
E-mail: datenschutz@schmalenberger.de

2. Use of personal data

We would like to point out that we record, store, process and use the personal data collected by us from suppliers, customers, other business partners and interested parties, in particular the name, address, telephone number, email address, contact details of contact persons, customer number and order and delivery data for the purpose of initiation, establishment and processing of contractual and delivery relationships, including delivery, payment and any warranty or product liability.

Personal data collected from you is required for the conclusion and processing of a contract. You are not obliged to provide this information. However, we cannot conclude a contract with you without this data.

Processing of your data occurs, in this respect, on the basis of Article 6 (1), b) General Data Protection Regulation.

We also collect, store, process and use this data for the purpose of maintaining customer or business relationships and marketing and advertising for our own products and services. Processing of your data occurs, in this respect, on the basis of Article 6 (1), f) General Data Protection Regulation. Regarding this, our legitimate interest in the processing of your data is derived from our efforts to promote and sell our own products and services.

Furthermore, we process data which we receive under legal requirements from credit agencies (e.g. Schufa in Germany) for the purpose of credit assessments regarding our suppliers, customers and other business partners. Processing of your data occurs, in this respect, on the basis of Article 6 (1), f) General Data Protection Regulation. Our legitimate interest in the processing of this data is derived from our interest in receiving the contractually due consideration (e.g. remuneration) for our services.

A disclosure of personal data to third parties does not occur, with the exception of following:

1. Disclosures to third parties that we engage to fulfil contractual and delivery conditions (e.g. banking institutions/payment service providers that process payments and transport companies/shipping companies handling deliveries);
2. Disclosures to third parties that we engage in the context of marketing and advertising of our own products and services (e.g. marketing service providers and printers);
3. Disclosures to specialised service providers such as IT service providers who provide services for us under our direction and on our responsibility for the purposes specified above (contract data processors);
4. Disclosures to third parties to which we are under a legal obligation (e.g. the tax office or other state authorities);
5. Disclosures to third parties to fulfil our commercial and tax obligations (e.g. to our tax advisor).

A disclosure of data to a third country outside the European Union which is also not a party to the Agreement on the European Economic Area only occurs if such a disclosure of data is necessary for the performance of a contract between you and us (e.g. delivery to a third country).

Processing of your data occurs for the duration of the initiation and handling of a contract and delivery relationship, for the duration of the continuation of obligations from a contract or delivery relationship (e.g. any warranty or product liability obligations) and for the duration of statutory retention periods of a commercial or fiscal nature.

With regard to the processing of your data for the duration of statutory retention periods of a commercial or fiscal nature, processing is realised on the basis of Article 6 (1), c) General Data Protection Regulation.

3. Rights of users and parties concerned

If we process personal data in order to advertise, you have the right to object at any time to the processing of your personal data for the purpose of advertising. If you object to processing for advertising purposes, your personal data will no longer be processed for these purposes.

Pursuant to Article 15 General Data Protection Regulation, you have the right to know whether we are processing personal data relating to you and, if applicable, a right to access this personal data and a right to, in particular, the following information about such data:

1. Processing purposes;
2. Categories of this data;
3. Recipients or categories of recipients to whom this data has been disclosed or will be still disclosed;
4. Planned duration of storage of this data or, if that is not possible, the criteria for determining this duration.

With regard to us, you also have the right pursuant to the conditions of Article 16 General Data Protection Regulation, to the correction of inaccurate or incomplete personal data relating to you and, pursuant to the conditions of Article 17 General Data Protection Regulation, the right to cancellation and, pursuant to the conditions of Article 18 General Data Protection Regulation, the right to restriction of the processing of personal data relating to you.

With regard to us, you have the right pursuant to Article 21 (1) General Data Protection Regulation to object at any time to the processing of personal data relating to you for the purposes of direct advertising. This also applies to profiling insofar as it is associated with such direct advertising.

You have a right to data portability pursuant to the conditions of Article 20 General Data Protection Regulation.

If processing of your data is based on your consent, you have the right to revoke your consent at any time. The legality of processing on the basis of this consent until the revocation is not affected.

If you believe that processing of your data violates data protection law or that privacy rights are violated in any other way, you have a right of appeal to a supervisory authority, in particular to the supervisory authority responsible for us. The supervisory authority responsible for us is the State Commissioner for Data Protection and Freedom of Information Baden-Württemberg:

Dr. Stefan Brink
Postfach 10 29 32
70025 Stuttgart
Germany

or:

Königstraße 10a
70173 Stuttgart
Germany

Tel.: +49 (0)7 11/61 55 41-0

Fax: +49 (0)7 11/61 55 41-15

E-mail: poststelle@lfdi.bwl.de

Website: <http://www.baden-wuerttemberg.datenschutz.de>

4. Information on data processing

Your data on use of our website which is processed is deleted or blocked as soon as the storage purpose no longer exists, if deletion of the data does not conflict with statutory retention requirements and if subsequently no contrary stipulations are given concerning individual processing methods.

Server data

For technical reasons, in particular to ensure a secure and stable internet presence, data is transmitted through your internet browser to us or to our web space provider. These so-called server log files are used to collect data including the type and version of your internet browser, the operating system, the web page(s) of our website, the date and time of each accessing and the IP address of the internet connection from which our website was used.

Data collected in this manner is stored temporarily, but not together with other information obtained from you.

This storage occurs on the legal basis of Article 6 (1), f) General Data Protection Regulation. Our legitimate interest lies in the improvement, stability, functionality and security of our website.

Data will be deleted after seven days at the latest, provided no further storage is required for the purpose of providing evidence. Otherwise, data is wholly or partially exempted from deletion until final clarification of an incident.

Cookies

a) Session cookies

We use so-called cookies with our website. Cookies are small text files or other storage technologies that are placed and stored on your device by the internet browser you use. These cookies process certain information about you to an individual extent, such as your browser or location data or your IP address.

This processing makes our website more user-friendly, more effective and more secure, as processing allows, for example, the reproduction of our website in different languages or the offer of a shopping basket feature.

The legal basis of this processing is Article 6 (1), b) General Data Protection Regulation, provided that such cookies process data for the purpose of initiating or handling a contract.

If processing does not serve the initiation or handling of a contract, our legitimate interest lies in improving the functionality of our website. The legal basis is then Article 6 (1), f) General Data Protection Regulation. Closing your internet browser deletes these session cookies.

b) Third-party cookies

Our website may also use cookies from partner companies with whom we cooperate for the purpose of advertising, analysis or the features of our website.

Please refer to the information below for details, in particular on the purposes and legal bases of processing of such third party cookies.

c) Disposal option

You can prevent or restrict the installation of cookies by configuring your internet browser. You can also delete previously saved cookies at any time. However, the steps and measures necessary for this depend on the specific internet browser you use. In the event of questions, please use the help function or documentation of your internet browser or contact its manufacturer or support service. However, processing cannot be prevented by settings of the browser in the case of so-called Flash cookies. You need instead to change the setting of your Flash player. The steps and measures

necessary for this also depend on the specific Flash Player you use. In the event of questions, please also use the help function or documentation of your Flash Player or contact the manufacturer or user support.

However, not all the features of our website may be fully usable if the installation of cookies is prevented or restricted.

Customer account / registration function

If you create a customer account with us via our website, we will collect and store the data you entered during registration (e.g. your name, address or email address) exclusively for pre-contractual services, performance of the contract or for the purpose of customer care (e.g. to provide you with an overview of previous orders you have placed with us or to offer you the so-called memo function). We then simultaneously save the IP address and date of your registration plus the time. Naturally enough, this data will not be disclosed to third parties.

Your consent to this processing is obtained and reference is made to this privacy statement as part of the further registration process. The data collected by us is used exclusively to provide the customer account.

Insofar as you consent to this processing, Article 6 (1), a) General Data Protection Regulation provides the legal basis for processing.

Insofar as opening of the customer account also serves pre-contractual measures or performance of the contract, the legal basis for this processing is also Article 6 (1), b) General Data Protection Regulation.

You can revoke the consent given to us in the opening and maintenance of the customer account at any time with effect for the future pursuant to Article 7 (3) General Data Protection Regulation. You only have to inform us of your revocation for this purpose.

The data collected in this respect will be deleted as soon as processing is no longer necessary. However, we must take fiscal and commercial retention periods into consideration in this context.

Contact inquiries / contact option

If you contact us by contact form or email, the data you provide will be used to process your inquiry. Specification of the data is necessary for processing and responding to your inquiry. We cannot respond to your inquiry or at best only to a limited extent without the provision of this data.

The legal basis for this processing is Article 6 (1), b) General Data Protection Regulation.

Your data will be deleted if your inquiry is ultimately answered and deletion does not conflict with any statutory retention requirements (e.g. in the event of any subsequent contract handling).

Google+ social plugin

We use the plugin provided by the Google+ (Google Plus) social network on our website. Google+ is an internet service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, hereinafter only referred to as "Google".

Through certification according to the EU-US Privacy Shield

<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>,

Google guarantees that EU data protection standards will also be respected when processing data in the United States.

The legal basis is Article 6 (1), f) General Data Protection Regulation. Our legitimate interest lies in the quality improvement of our website.

Google has more information about potential plugins and their respective features for you at <https://developers.google.com/+/web/>.

If the plugin is stored on one of the pages you visit on our website, your internet browser downloads a display of the plugin from Google's servers in the USA. It is necessary for Google to process your IP address during this for technical reasons. However, the date and time of the visit to our website is also recorded.

If you are logged into Google while you visit one of our web pages with the plugin, the information on your specific visit collected by the plugin will be recognised by Google. Information collected in this manner may be assigned to your personal account by Google. For example, if you use Google's "Share" button, this information is stored in your Google user account and, if appropriate, published through the Google platform. If you wish to prevent this, you must either log out of Google before visiting our website or configure the appropriate settings in your Google user account. Further information about the collection and use of data and your rights and protection options in this respect is available from Google in the privacy policy at <https://policies.google.com/privacy>.

Google Maps

We use Google Maps on our website to display locations and create directions. This is a service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, hereinafter only referred to as "Google".

Through certification according to the EU-US Privacy Shield <https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>, Google guarantees that EU data protection standards will also be respected when processing data in the United States.

In order to enable the depiction of certain fonts on our website, a connection is established with the Google server in the USA when our website is accessed.

Insofar as you access the Google Maps component integrated on our website, Google will store a cookie on your device via your internet browser. Your user settings and data are processed to display locations and directions. We cannot rule out the use by Google of servers in the United States in this respect.

The legal basis is Article 6 (1), f) General Data Protection Regulation. Our legitimate interest lies in optimising the functionality of our website.

The connection to Google established in this manner enables Google to determine from which website your request has been sent and to which IP address the directions are to be transmitted.

If you do not agree with this processing, you have the option to prevent the installation of cookies through appropriate settings in your internet browser. Details on this can be found above under "Cookies".

In addition, use of Google Maps and information obtained through Google Maps occur pursuant to the Google terms of use <https://policies.google.com/terms?gl=DE&hl=de> and Google Maps terms and conditions https://www.google.com/intl/de_de/help/terms_maps.html.

Furthermore, Google provides more information at <https://adssettings.google.com/authenticated> or <https://policies.google.com/privacy>.

Facebook social plugin

We set the plugin provided by the Facebook social network on our website. Facebook is an internet service provided by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA. In the EU, this service is in turn operated by Facebook Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland. Both of these are hereinafter only referred to as "Facebook".

Through certification according to the EU-US Privacy Shield

<https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active>,

Facebook guarantees that EU data protection standards will also be respected when processing data in the United States.

The legal basis is Article 6 (1), f) General Data Protection Regulation. Our legitimate interest lies in the quality improvement of our website.

Facebook has more information about potential plugins and their respective features for you at <https://developers.facebook.com/docs/plugins/>.

If the plugin is stored on one of the pages you visit on our website, your internet browser downloads a display of the plugin from Facebook's servers in the USA. It is necessary for Facebook to process your IP address during this for technical reasons. However, the date and time of the visit to our website is also recorded.

If you are logged into Facebook while you visit one of our web pages with the plugin, the information on your specific visit collected by the plugin will be recognised by Facebook. Information collected in this manner may be assigned to your personal account by Facebook. For example, if you use Facebook's "Like" button, this information is stored in your Facebook user account and, if appropriate, published through the Facebook platform. If you wish to prevent this, you must log out of Facebook before visiting our website.

Further information about the collection and use of data and your rights and protection options in this respect is available from Facebook in the privacy policy at <https://www.facebook.com/policy.php>.

Twitter social plugin

We set the plugin provided by the Twitter social network on our website. Twitter is an internet service provided by Twitter Inc., 795 Folsom St., Suite 600, San Francisco, CA 94107, USA, hereinafter only referred to as "Twitter".

Through certification according to the EU-US Privacy Shield

<https://www.privacyshield.gov/participant?id=a2zt0000000TORzAAO&status=Active>,

Twitter guarantees that EU data protection standards will also be respected when processing data in the United States.

The legal basis is Article 6 (1), f) General Data Protection Regulation. Our legitimate interest lies in the quality improvement of our website.

If the plugin is stored on one of the pages you visit on our website, your internet browser downloads a display of the plugin from Twitter's servers in the USA. It is necessary for Twitter to process your IP address during this for technical reasons. However, the date and time of the visit to our website is also recorded.

If you are logged into Twitter while you visit one of our web pages with the plugin, the information on your specific visit collected by the plugin will be recognised by Twitter. Information collected in this manner may be assigned to your personal account by Twitter. For example, if you use Twitter's "Share" button, this information is stored in your Twitter user account and, as the case may be, published through the Twitter platform. If you wish to prevent this, you must either log out of Twitter before visiting our website or configure the appropriate settings in your Twitter user account.

Further information about the collection and use of data and your rights and protection options in this respect is available from Twitter in the privacy policy at <https://twitter.com/privacy>.

YouTube

We use YouTube on our website. This is a video portal provided by YouTube LLC., 901 Cherry Ave., 94066 San Bruno, CA, USA, hereinafter only referred to as "YouTube".

YouTube is a subsidiary of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, hereinafter only referred to as "Google".

Through certification according to the EU-US Privacy Shield

<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>,

Google and, consequently, the subsidiary YouTube guarantee that EU data protection standards will also be respected when processing data in the United States.

The legal basis is Article 6 (1), f) General Data Protection Regulation. Our legitimate interest lies in the quality improvement of our website.

We use YouTube in conjunction with the Enhanced Privacy Mode feature to show you videos. The legal basis is Article 6 (1), f) General Data Protection Regulation. Our legitimate interest lies in the quality improvement of our website. According to YouTube, the Enhanced Privacy Mode feature means that the data specified in greater detail below is only transmitted to the YouTube server when you actually start a video.

Without this enhanced privacy, a connection is established with the YouTube server in the United States as soon as you visit one of our web pages on which a YouTube video is embedded.

This connection is required to display the respective video on our website via your internet browser. In the course of this, YouTube will at least collect and process your IP address, the date and time and

the website you are visiting. In addition, a connection to Google's DoubleClick advertising network is also established.

If you are logged into YouTube at the same time, YouTube will assign the connection information to your YouTube account. If you wish to prevent this, you must either log out of YouTube before visiting our website or configure the appropriate settings in your YouTube user account.

For the purpose of functionality and the analysis of user behaviour, YouTube permanently stores cookies via your internet browser on your device. If you do not agree with this processing, you have the option to prevent the storage of cookies through a setting in your internet browser. More detailed information on this can be found above under "Cookies".

Further information about the collection and use of data and your rights and protection options in this respect is available from Google in the privacy policy at <https://policies.google.com/privacy>.

Flickr

We use plugins from the photo service Flickr on our website. This is a service provided by Yahoo! Inc., 701 First Avenue, Sunnyvale, CA 94089, USA. The legal basis is Article 6 (1), f) General Data Protection Regulation. Our legitimate interest lies in the quality improvement of our website.

We have no influence over the type of data collected by such a plugin. We also have no control over how Flickr's data is used. It can be assumed that at least the IP address and information on the terminal devices used are collected and used. It also cannot be ruled out that Flickr tries to store cookies on the devices used. Thus Flickr can be informed about visits to certain sites on the internet. Users who are logged into Flickr at the same time can be identified by Flickr. Information on the data collected and its use is contained in the Flickr privacy policy which you can view at <https://policies.oath.com/ie/de/oath/privacy/products/flickr/index.html>.

etracker web analytics

We use etracker on our website. This is a web analytics service provided by etracker GmbH, Erste Brunnenstr. 1, 20459 Hamburg, hereinafter only referred to as "etracker".

We use etracker to analyse usage behaviour on our website. The legal basis is Article 6 (1), f) General Data Protection Regulation. Our legitimate interest lies in the analysis, optimising and commercial operation of our website.

To analyse usage behaviour, etracker stores cookies on your device via your internet browser while also creating a pseudonymous usage profile. However, the data processed during this is not used without your separate consent to your personal identification. Nor is this data merged with other personal information.

If you do not agree with this processing, you have the option to prevent storage of the cookie through a setting in your internet browser. More detailed information on this can be found above under "Cookies".

In addition, you have the option to end analysis of your usage behaviour through a so-called opt-out. Confirmation of the link <http://www.etracker.de/privacy?et=V23Jbb> causes a cookie to be stored on your device via your internet browser which prevents further analysis. However, please note that you will need to actuate the above link again if you wish to delete the cookies stored on your device.

Google AdWords with conversion tracking

We use the Google AdWords advertising component and so-called conversion tracking on our website. This is a service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, hereinafter only referred to as "Google".

Through certification according to the EU-US Privacy Shield

<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>,

Google guarantees that EU data protection standards will also be respected when processing data in the United States.

We use conversion tracking for targeted advertising of our offer. The legal basis is Article 6 (1), f) General Data Protection Regulation. Our legitimate interest lies in the analysis, optimising and commercial operation of our website.

If you click on an ad run by Google, the conversion tracking we use stores a cookie on your device. These so-called conversion cookies lose their validity after 30 days and do not result in your personal identification.

If the cookie is still valid and you visit a certain page of our website, both we and Google can evaluate that you have clicked on one of our ads placed on Google and that you have subsequently been redirected to our website.

Google uses the information collected in this manner to provide us with statistics about visits to our website. We also obtain information as a result on the number of users who have clicked on our ad(s) and about the pages of our website subsequently accessed. However, neither we nor third parties who also use Google AdWords will be able to identify you in this way.

You can also prevent or restrict the installation of cookies through appropriate configuration of your internet browser. You can also delete previously stored cookies at any time. However, the steps and measures necessary for this depend on the specific internet browser you use. In the event of questions, please use the help function or documentation of your internet browser or contact its manufacturer or support service.

Furthermore, Google also provides further information on this topic at

<https://services.google.com/sitestats/de.html>

<http://www.google.com/policies/technologies/ads/>

<http://www.google.de/policies/privacy/>

and, in particular, on options for preventing use of data.

Online job applications / publication of job advertisements

We offer you the possibility to apply to us through our website. During these digital applications, your applicant and application data is electronically collected and processed by us to handle the application procedure.

The legal basis for this processing is Section 26 (1) 1 of the German Federal Data Protection Act in conjunction with Article 88 (1) General Data Protection Regulation.

If an employment contract is concluded following the application process, we will save the data you have submitted in the application in your personal file for the purpose of the normal organisational and administrative process. Naturally enough, we take further legal obligations into consideration in this context.

The legal basis for this processing is also Section 26 (1) 1 of the German Federal Data Protection Act in conjunction with Article 88 (1) General Data Protection Regulation.

In the event of rejection of an application, we automatically delete the data submitted to us two months after notification of rejection. However, deletion does not occur if the law requires that the data be stored for a longer period of up to four months or until the completion of legal proceedings (e.g. because of the burden of proof to be provided under the German General Equal Treatment Act).

The legal basis in this case is Section 6 (1), f) General Data Protection Regulation and Section 24 (1) 2 of the German Federal Data Protection Act. Our legitimate interest lies in legal defence and law enforcement.

If you expressly consent to longer storage of your data (e.g. for your inclusion in a database of applicants or interested parties), the data is processed further on the basis of your consent. The legal basis is then Article 6 (1), a) General Data Protection Regulation. However, you can of course revoke your consent at any time through a declaration to us pursuant to Article 7 (3) General Data Protection Regulation with effect for the future.

5. Updating and amendment of this privacy statement

This privacy statement is currently valid and has been updated in September 2019.

It may be necessary to amend this privacy statement due to further development of our website and offers or changed legal or regulatory requirements. The current privacy declaration in each case can be viewed and printed by you at any time at <http://www.schmalenberger.de/unternehmen/datenschutz.html>.