

## Video Surveillance Privacy Policy

HAHN+KOLB has been a responsible business partner and employer for 120 years. Compliance with applicable laws and with other external and internal regulations is a fundamental component of our business activities and decisions. Data protection is a matter of trust and your trust is important to us. We respect your privacy and personal space. This means that lawful collection, processing, use and protection of your personal data is important to us.

A video surveillance system is operated on the premises of HAHN+KOLB Werkzeuge GmbH. The areas monitored are the driveway, the entrance areas and the visitor car park. This privacy policy will inform you of the processing activities we carry out as part of our video surveillance.

### 1. Who is responsible for data processing?

The party responsible for collecting, processing and using your personal data and therefore also for adhering to data protection regulations is

HAHN+KOLB Werkzeuge GmbH  
Schlieffenstraße 40  
71636 Ludwigsburg, Germany  
Telephone: +49 (0)7141 498-40  
Email: [info@hahn-kolb.de](mailto:info@hahn-kolb.de)

### 2. Which of your personal data will we process?

As part of the video surveillance, video recordings are processed with the following data categories:

- **Image data** (appearance, behaviour)
- **Vehicle registration number**
- **Location of the recording** (place, camera site)
- **Time of recording** (date, time, start/end of image recording)
- **Role of affected persons** (e.g. perpetrators, victims, witnesses)

### 3. Privacy by design

The principle of "privacy by design" has been considered in the planning, acquisition and installation of the video recording system. As a result of this built-in data protection, there is:

- **No audio recording**
- **No automatic facial recognition**
- **No recording of public roads, employee or social rooms or in the canteen area**
- **Very limited access rights**

## 4. What is the legal basis for processing this data?

Your personal data is processed in accordance with the provisions of the European General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (BDSG).

The legal basis for video surveillance in publicly accessible areas is Art. 6, section 1 (f) of the GDPR.

In respect of employees, processing is supported by Art. 26, section 1 of the new BDSG.

## 5. What is the purpose of processing your data?

- **Protecting the security of premises**
- **Safeguarding of legitimate interests**, in particular:
  - For preventative protection against unauthorised entry to the premises and the building
  - For preventative protection of the legal interests of management, employees, other workers and third parties
  - To prevent the risk of accidental damage, vandalism and burglary
  - To minimise/prevent, detect or investigate criminal offences and other serious violations of duty
  - For the preservation of evidence
  - For the establishment of civil claims for damages where necessary

No other use is permitted.

In all cases, our legitimate interest for processing follows from the fact that the processing purpose outweighs the minimal impact on the subject caused by that processing and the short-term data storage. For this reason, no privacy impact assessment is provided.

## 6. Who receives your personal data?

- **Internal:** Recipients of data within our company are employees and departments that require this data to achieve the purposes mentioned above and that are authorised to process this data.
- **External:** Where a criminal act is suspected, we may pass data on to law enforcement authorities. Otherwise, data will only be transferred if there is a legal basis for the transfer. This is a particular concern when the police or other security authorities are conducting "preventative measures" and request access to video surveillance data.

## 7. Is your data transmitted to third countries or international organisations?

No data is transmitted to third countries.

## 8. How long do we store this data?

Personal data is stored by us only as long as it is required for the fulfilment of the respective purposes or to meet our contractual or statutory obligations.

The video recordings are stored for a period of four days and will be overwritten by new recordings. Where an incident occurs, this recording can be stored separately. If video recordings are stored as evidence in a criminal and/or civil prosecution, deletion will occur in accordance with the statutes of limitation.

## 9. Automated individual decisions

Fully automated decision-making (including profiling) as defined in Art. 22 GDPR does not take place.

## 10. Information about your rights

If you are dissatisfied with the data protection measures indicated here or if you have further questions regarding the collection, processing and/or use of your personal data, please contact us. We will answer your questions as quickly as possible and try to put your suggestions into practice. If the legal requirements are met, you are entitled to information, rectification, deletion, restriction, data portability and objection. In order to do so, please contact our data protection officer:

HAHN+KOLB Werkzeuge GmbH  
Data Protection Officer  
Schlieffenstraße 40  
71636 Ludwigsburg, Germany  
Email: [Datenschutz@hahn-kolb.de](mailto:Datenschutz@hahn-kolb.de)

However, please note that HAHN+KOLB may not always be obliged to meet a request for deletion, restriction or data portability, or to accommodate an objection. Each case will be evaluated individually based on the statutory obligations of HAHN+KOLB and any applicable exceptions.

If you believe that the processing of your personal data contravenes data protection laws or that your legal rights to data protection are being infringed for any other reason, please inform your contact person at HAHN+KOLB or contact our data protection officer directly so that we can resolve the issue. You also have the right to lodge a complaint with a data protection supervisory authority at your residence, place of work or at the location of the alleged infringement.

- **Right to information** (according to Article 15 GDPR):  
You have the right to request, free of charge, information on whether personal information is stored about you, what the data is and the purpose for which it is stored.
- **Right to rectification** (according to Article 16 GDPR):  
You have the right to request the immediate correction of any incorrect personal data held about you. Taking into account the purpose for which your personal data is processed, you have the right to request the completion of any incomplete data, including by means of a supplementary declaration.  
  
This right is restricted in that it is not technically possible to alter video recordings.
- **Right to erasure - "right to be forgotten"** (according to Article 17 GDPR):  
You have the right to request that your personal data be erased immediately provided that one of the reasons detailed in Article 17 of the GDPR applies, e.g. if the data is no longer needed for the purpose it was collected.  
  
The right to erasure will be implemented by automatic overwriting of the data, so long as the data is not being stored for a specific purpose.
- **Right to restriction of processing** (according to Article 18 GDPR and Article 35 BDSG, latest version):  
You have the right to request that processing of your data be restricted if any of the conditions listed in Article 18 of the GDPR is met. Processing will be restricted, for example, where you have lodged an objection to processing of your data and it has not yet been determined whether HAHN+KOLB have sufficient justification to outweigh this.
- **Right to data portability** (according to Article 20 GDPR):  
You have the right to obtain your data from us in a structured, commonly used and machine-readable format. We must not prevent you from forwarding this to another responsible party.

- **Right to object** (according to Article 21 GDPR):  
At any time and for reasons relating to your own situation, you have the right to lodge an objection to the legitimate processing of your personal data. Where an objection is lodged, we will no longer process your personal data unless we can prove that there are urgent and compelling reasons to process it that outweigh your interests, rights and freedoms, or if its processing is required for the establishment, exercise or defence of legal claims.
- **Right to lodge a complaint with the supervisory authority** (according to Article 13(2)(d) and Article 77 GDPR in conjunction with Article 19 BDSG, latest version):  
If you believe that the processing of your personal data contravenes data protection laws or that your legal rights to data protection are being infringed for any other reason, you may lodge a complaint with a data protection supervisory authority at your residence, place of work or at the location of the alleged infringement.
- **Withdrawal of consent** (according to Article 7 section 3 of the DSGVO):  
Any consent can be withdrawn at any time and independently of any other consent. As a result, we will cease processing your data for the purposes mentioned above from the point you withdraw consent, and the respective rights, benefits etc. associated with this can no longer be asserted. We keep an record of your withdrawal for documentation and verification purposes.

## 11. Further information:

We hope that this privacy policy clarifies the purposes for which HAHN+KOLB processes your personal data.

From time to time, this privacy policy regarding video surveillance may be updated to reflect current circumstances due to new technologies and the continuous further development of data processing procedures and methods as well as to meet new legal requirements. We therefore recommend that you check the privacy policy at regular intervals for the latest version.