

Privacy policy for business partners and interested parties

HAHN+KOLB has been a responsible business partner 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.

This privacy policy will inform you of the processing activities we carry out as part of our business relationships. It is aimed at all employees of HAHN+KOLB business partners and interested parties, as well as at business partners and interested parties that are sole proprietorships.

Business partners and interested parties may be, for example:

Customers, suppliers, subcontractors, service providers, co-operative partners, development partners, logistics partners, distributors, sales partners, trade representatives, consultants, trainers, assessors, leasing companies, banks, insurance companies, insurance brokers, accountants, auditors, lawyers.

1. Who is responsible for data processing?

The company HAHN+KOLB, with headquarters in Ludwigsburg, with which you or your employer are in contact or engaged in a business relationship, is responsible for the collection, processing and use of your personal data as defined by the GDPR. This means that HAHN+KOLB decides the purpose and means of processing personal data.

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

2. Where do we obtain your personal data?

The personal data we process primarily comes from you, though it may also originate from your colleagues, your manager, your employer, your HR department, from third parties to which you have referred us for the collection of personal data and possibly from publicly available sources, information databases or from credit agencies. Some data can also be generated by HAHN+KOLB IT systems (e.g. user names).

3. Which of your personal data will we process?

HAHN+KOLB processes the following data categories or parts thereof. Please note that some items in the list may not apply to you. In specific terms, the data we process depends mainly on the work you perform for your employer, the field in which your employer is engaged and your specific relationship with HAHN+KOLB. Please also note that the examples listed in each category are not exhaustive.

- **Contact data** (usually work contact details unless you provided personal details): e.g. name, form of address, title, address, telephone number, mobile number, email address and other information required for contact purposes through modern communication technology
- **Company and workplace data:** e.g. company name, job function and position, organisational structure, line manager, scope of authority, membership of particular purchasing or sales groups, business cases or projects you work on
- **Individual data:** e.g. language of communication, photo, date of birth (e.g. for patent applications or because it was specified in a commercial register), citizenship, e.g. for invitations to make visa applications), travel and event details (e.g. HAHN+KOLB events visited, travel, flight, transfer and hotel details if provided or if organised by HAHN+KOLB), role, (e.g. working with customers or suppliers, consultant, visitor, driver, data subject as defined by the GDPR), information from maintaining contacts (e.g. hobbies, marital status, where indicated by you), result of a sanctions list check, any approvals or declarations of consent provided by you

- **Contract data:** e.g. orders, contracts and other agreements between you and HAHN+KOLB, data on customs clearance and export monitoring
- **Financial data:** e.g. shareholdings, bank details, VAT number, Intrastat identification number, details of any warnings or blocks (e.g. invoice, supplier or payment blocks), bonus and commission details
- **IT-related data:** e.g. log data generated while using IT systems, user identifiers (login details, user ID), assigned WiFi access data
- **Visitor data:** e.g. appointment (planned beginning and end), location, visitor pass number, picture (for holders of season tickets), vehicle registration number, date of safety training, access privileges, name of HAHN+KOLB employees visited
- **Accident data** (in the event of accidents on a HAHN+KOLB site): e.g. accident time, course of events leading to accident, location of accident, health details (e.g. type and severity of injury)
- **Image data:** Photo and video recordings as a result of participation in events, e.g. meetings, conferences, training, seminars, corporate events, trade fairs, anniversaries, customer events, etc.
- **Video surveillance data:** Monitoring of publicly accessible areas on the HAHN+KOLB premises such as customer parking, driveway and entrance areas: e.g. image data (appearance, behaviour), vehicle registration number, location where the recording took place (place, camera site), time of image recording (date, time, start/end of image recording), role of those concerned (e.g. perpetrator, victim, witness),
- **Subject data** (where the rights of the subject are being asserted in accordance with the GDPR): e.g. the category of data subject, type and content of the request, proof of identity (if necessary), handling of the request, date contact is made and date of completion
- **Other personal data** required for the initiation, processing and management of business relationships, or volunteered by you, or that can be obtained from publicly available sources, information databases or from credit agencies.

4. Purpose and legal basis for processing

HAHN+KOLB processes your personal data to ensure smooth fulfilment of the contractual obligations arising from the contractual relationship between you or your employer and HAHN+KOLB or prior to entering into a contract (art. 6, section 1 (b) of the GDPR), for compliance with legal obligations to which HAHN+KOLB is subject (art. 6, section 1 (c) of the GDPR), and to protect legitimate interests of HAHN+KOLB in processing your data (art. 6, section 1 (f) of the GDPR). HAHN+KOLB will only ask for your consent to process your personal data in exceptional cases when none of the other legal bases can be used (art. 6, section 1 (a) of the GDPR).

In normal cases, the legitimate interest of HAHN+KOLB is to ensure smooth business operation, to secure and implement contracts with you or your employer and to have contact with you, our customer, to improve the quality of our advice and to contact you more easily in the event of queries.

Only in exceptional cases will HAHN+KOLB also process special categories of personal data, known as sensitive data (e.g. health details in the event of accidents on HAHN+KOLB premises). In this case, processing is based either on your consent (art. 9, section 2 (a) of the GDPR) or it is required for the establishment, exercising or defence of legal claims (art. 9, section 2 (f) of the GDPR).

Your personal data will be processed for the following general purposes. Please note that some items in the list may not apply to you. The specific purposes for which we process your data depends mainly on the work you perform for your employer, the field in which your employer is engaged and your specific relationship with HAHN+KOLB. Please also note that the examples listed for each purpose are not exhaustive.

- **Customer service and sales:** Processing for the purpose of initiating business with customers concerning the supply and service offer from HAHN+KOLB.

- **Supply chain management:** Processing for the purpose of fulfilment and implementation of supply contracts with customers and suppliers and for conducting logistical processes along the supply chain (e.g. transfer of order processing data to the manufacturer and supplier for direct delivery when HK does not have goods in stock).
- **Purchasing:** Processing for the purpose of initiating business with suppliers and for maintaining operating performance by supplying the organisation with raw materials, auxiliary materials, operating supplies, materials, services and advice.
- **Development of technology and products:** Processing for the purpose of generating ideas and innovations, for entering into and fulfilling co-operative arrangements, for handling and protecting inventions and patents and for applying for and processing sponsorship.
- **Corporate communication:**
 - To provide information to business partners, interested parties and the general public.
 - To provide you with information about HAHN+KOLB and its products and services.
 - To write to you on special occasions (e.g. anniversaries or holidays like Christmas).
 - To invite you to events that we believe may be of interest to you.
 - For marketing purposes such as sending our catalogues and brochures.

Existing customers may receive promotional material by email or telephone. Non-customers may only be contacted by email (e.g. newsletter) or telephone with their specific consent,

- **Event management:** Processing for the purpose of organising and implementing HAHN+KOLB events and for arranging participation in external events such as meetings, conferences, training sessions, seminars, corporate events, trade fairs, anniversaries, customer events.
- **Documentation of company history and development:** e.g. photo and film shoots as a result of participation in events such as meetings, conferences, training sessions, seminars, corporate events, trade fairs, anniversaries, customer events.

Before any publication of photo and video recordings, consent will be obtained from anyone featured in the recording (i.e. highlighted in particular).

Only in cases where there is a very large number of people or where people feature incidentally in images will consent for publication not be obtained. In these cases, publication will be supported by the legitimate interests of HAHN+KOLB (the legitimate interests in this case are: external representation and maintaining an image through marketing and public relations work).

- **Quality management:** Processing for the purpose of administration, resolution and documentation of complaints.
- **Management of environment, health and safety (EHS):** Processing for the purpose of operating environmental, health and safety management systems and to sustainably manage all aspects of the environmental, health and safety areas.
- **Project management and continuous improvement process:** Processing for the collection, evaluation and implementation of improvement ideas, measures and projects, if you or your employer works with HAHN+KOLB in this area.
- **IT service management:** Processing for the purpose of management, planning, conducting, tracking and billing of orders (projects, service requests, faults) to the IT department, if you or your employer works with HAHN+KOLB in this area.
- **Security management:** Management of the access system (e.g. ID creation, access permissions and monitoring) and video surveillance of the HAHN+KOLB premises.
- **Accounting:** Processing for the purpose of conducting payments.

- Processing for the purpose of **accounting and preparation of annual financial statements** for the individual subsidiaries and the group.
- **Treasury management:** Processing in connection with financial investments, financing and credit insurance.
- **Legal advice:** Processing in connection with legal advice (e.g. contract preparation or scrutiny, testing, defence or enforcement of legal claims, adjudication of any disputes).
- **Legal contract management:** Processing for the purpose of managing a digital contract database.
- **Compliance management system:** Processing for the purpose of managing a group-wide Compliance Management System (CMS) in order to ensure and document compliance with safety rules, regulations, industry standards and contractual obligations.
- **Data protection:** Processing in order to ensure compliance with accountability according to art. 5 and 24 of the GDPR and to maintain the rights of subjects as defined by the GDPR and Federal Data Protection Act (BDSG) in the latest version.
- **Internal audit:** Processing for the purpose of ensuring the reliability and integrity of financial and operational information, the safeguarding of assets and compliance with laws, regulations, policies, procedures and contracts.
- **Personnel administration:** Processing for calculation of wages, salaries, fees and for compliance with recording, disclosure and reporting obligations, if you or your employer works with HAHN+KOLB in this area.
- **Personnel development:** Processing to determine appropriate education and training measures and for the targeted development of HAHN+KOLB employees' skills, if you or your employer works with HAHN+KOLB in this area.
- **Identification, obtaining and employing staff,** if you or your employer works with HAHN+KOLB in this area.
- **Administrative activities:** Processing for the purpose of hospitality (for visits to HAHN+KOLB), administration of business travel (travel bookings and visa applications), management of company credit cards.
- **Discovery of criminal activities:** We may process your personal data if documented evidence indicates that a crime has been committed and where processing is necessary to detect it. We may do this only when your interest in preventing processing for the protection of your personal data does not outweigh this purpose, and in particular when the nature and extent of processing is not disproportionate to the need.

All of these processing activities may include text documents created and archived both with and without the use of automated processes (such as correspondence) in these matters.

It is necessary to process your personal data to achieve the purpose named above. Failure to provide such data could result, depending on the category of data, in us not being able to fulfil the specified purposes in a contractually or legally compliant manner. Operational processes may be more difficult. We may not be able to carry out pre-contractual activities, or negotiate or fulfil our contractual relationship with you or your employer.

5. Who receives your personal data?

In order to process your data for an intended purpose, it may be necessary in individual cases to transmit relevant data to other companies within the HAHN+KOLB Group or to third parties, potentially those outside the EU/EEA. The recipients may be:

- **Internal:** Employees, departments and the staff canteen all receive data within our company. This data is required for the purposes mentioned above and the parties are authorised to process this data.
- **Within the WÜRTH group of companies:** Within the WÜRTH Group, your data will be sent to specific companies if those companies conduct data processing tasks centrally for the Group (e.g. cloud services, planning and implementing events and business trips).
- **External:** Outside our company and the WÜRTH Group, regular recipients of data are business partners (work contact details to suppliers, service providers, interested parties, customers, consultants and assessors), hotels and airlines (business travel), education and training providers, auditors, legal representatives, patent attorneys, tax advisors, auditors, courts, supervisory authorities, banks, company doctors, external security specialists, classification bodies, certification bodies and auditors, funding bodies, health, social and accident insurers as well as other insurance companies.
- **Data processors:** Beyond this, data processors engaged by us may, according to art. 28 of the GDPR, receive data in addition to other service providers (e.g. data centre service providers, IT partners, document shredders, printers and advertising service providers). These data processors are contractually bound by us to maintain corporate secrecy and to comply with the stipulations of the GDPR and the Federal Data Protection Act (BDSG) in its latest version. Data processors may be third parties or other companies within the WÜRTH Group. No more data is ever passed on than is required. Where possible, your personal data will not be passed on.
- **Public bodies and institutions:** In certain cases, we also provide data to public bodies and institutions (e.g. supervisory authorities, financial authorities, registrars, health authorities, road traffic authorities, research institutions, universities, patent offices, embassies and consulates) as well as creditors and representatives of creditors.

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

If, in order to process your data for an intended purpose, it is necessary in an individual case to transmit relevant data to a recipient outside the EU/EEA, the appropriate level of protection is generally determined by an adequacy decision of the European Commission, by inter-company or external agreements based on standard EU data protection clauses (in accordance with art. 46 section 2 (c) and (d) of the GDPR) or by the provision of a GDPR exception for that specific case (in accordance with art. 49 section 1 of the GDPR, e.g. the transfer is required for the fulfilment of the contract between you and HAHN+KOLB).

7. How long do we store this data?

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

We are subject to various retention and documentation requirements. These arise from the German Commercial Code (HGB), the Tax Code (AO), the Money Laundering Act (GwG) and the Income Tax Act (EStG). The retention periods specified herein are usually up to 10 years. For some categories of data such as occupational retirement pensions, these can be 30 years or more. It is also possible that personal data is stored for the period during which claims may be brought against us (statutory limitation period of 3 or up to 30 years).

8. Automated individual decisions

In certain areas, we use automated procedures for decision-making. Fully automated decision-making (including profiling) as defined in art. 22 of the GDPR does not take place, however. Should this become the case in the future, we will inform you separately.

9. Credit checking

If you are a HAHN+KOLB customer who has chosen to be invoiced for a purchase (bank transfer or direct debit), we send your personal data to the following party to check whether they will undertake to refinance the claim in the event of non-payment:

- Concent Forderungsmanagement GmbH, Hugo-Junkers-Straße 3, 60386 Frankfurt am Main, Germany (Concent).

Concent examines the likelihood of non-payment. For this, Concent asks, if applicable, the following credit agencies under specification of your data (name, address, date of birth):

- Producta Daten-Service GmbH, Postfach 61 05 61, 60347 Frankfurt am Main
- Schufa Holding AG, Postfach 56 40, 30056 Hanover

These identify personal characteristics or calculate a probability value of a payment default on the basis of a mathematical-statistical process (scoring). If Concent assumes the risk of non-payment, the data necessary for carrying out that business transaction will be transmitted to Concent and stored by them.

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. You have the right to access, rectify or erase your data or restrict the processing of your data, as well as the right to data portability and to lodge an 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

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 we (also) process your data for advertising purposes, you can object to this processing for the purpose of direct marketing at any time. If this processing is conducted on the basis of your consent, you have the right to withdraw that consent at any time. Withdrawal of consent will not affect the lawfulness of processing carried out on the basis of that consent before it is withdrawn.

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.

Explanation of your rights as a data subject under the GDPR:

- **Right to information** (in accordance with art. 15 of the 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** (in accordance with art. 16 of the 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.
- **Right to erasure – "right to be forgotten"** (in accordance with art. 17 of the GDPR):
You have the right to request that your data be erased immediately. HAHN+KOLB is obliged to immediately erase personal data where one of the following reasons applies:
 - Purposes for which the personal data was collected no longer apply
 - You revoke your consent for processing and there is no other legal basis for processing
 - You object to processing and there is no other legal basis for processing
 - The personal data has been processed unlawfully
 - Erasure of the personal data is necessary to fulfil a legal obligation in accordance with EU law or the law of the member states to which HAHN+KOLB is subject as the responsible party
- **Right to restriction of processing** (in accordance with art. 18 of the GDPR and § 35 of the BDSG in its latest version):
You have the right to request that processing of your data be restricted if any of the following conditions is met:
 - You are disputing the accuracy of your personal data
 - Processing is unlawful but you do not wish for your data to be erased
 - Personal data is no longer required for the purposes for which it was processed, but you require the data for the establishment, exercise or defence of legal claims
 - You have lodged an objection to the processing of your personal data in accordance with art. 21, section 1 of the GDPR. Processing will be restricted until it is determined whether the legitimate interests of HAHN+KOLB are sufficient.
- **Right to data portability** (in accordance with art. 20 of the 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** (in accordance with art. 21 of the 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.
- **The right to appeal to the supervisory authority** (in accordance with art. 13 section 2 (d), 77 of the GDPR in conjunction with § 19 of the BDSG in its 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** (in accordance with § 26 section 2 of the BDSG in its latest version):
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 for employees of business partners and interested parties of HAHN+KOLB may be updated to reflect the current situation in respect of new technologies and continuous further development of procedures and data processing methods. We therefore recommend that you check the privacy policy at regular intervals for the latest version.