

The protection of the personal data of our customers and their contacts, sales partners, suppliers and business partners is an important concern for FEY Lamellenringe GmbH & Co. KG ("FEY"), Josef-Fey-Strasse 2, 86343 Königsbrunn.

We process the data you provide in compliance with the regulations of the European General Data Protection regulation (EU GDPR) and the German Data Protection Law (BDSG) to ensure data protection and data security.

The following information applies to all customers and potential customers of FEY products and all other private individuals who are in contact with FEY in relation to these products (contacts, for example).

### **1. Contact details of the responsible body and the data privacy officer**

The following is responsible for processing your personal data as described below:

FEY Lamellenringe GmbH & Co. KG  
Managing Directors: Elke Fey & Peter Holzheu  
Josef-Fey-Strasse 2  
86343 Königsbrunn  
Phone: +49 8231-96180  
Email: info@fey-lamellenringe.de

The Chief Data Privacy Officer is available under:

Josef-Fey-Strasse 2  
86343 Königsbrunn  
Phone: +49 8231-96180  
Email: datenschutz@fey-lamellenringe.de

### **2. Data categories, purpose of processing and legal basis**

We process personal data ("data") only on a level which is strictly necessary for concluding or executing contracts, using the principles of data prevention and data economy, which we are permitted to do on the basis of applicable legal regulations or which we are obliged to do or to which you have given your consent.

We generally collect your data directly from you. Furthermore, we obtain data from publicly accessible sources such as public media (for example the internet and newspapers) and public registers (for example the Commercial Register).

#### **a. Data relating to the business relationship**

As part of our efforts to secure new business and service our current business relationship, we particularly collect, process and use the following data:

- Master data of the business partner(s), particularly company name, name, language, position, industry, business activities, business address, business phone number, business mobile phone number, business fax number and business email address;

- If contacts have been named: their master data, particularly name and contact details, such as current address, other shipment addresses, telephone numbers and email addresses;
- Contract details such as purchase orders placed, enquiries or project details, start and end of contract;
- Banking details, for example your account's IBAN and BIC and details of your bank;
- Data referring to your tax details, in particular tax ID and tax number;
- Payment history;
- In some cases, we obtain information from your bank;
- Data from mail, electronic and telephone communication between you and us;
- Data relating to the completion of customer satisfaction surveys;
- Possibly other data relating to the fulfilment of the business relationships.

## **b. Purpose of processing and legal basis**

### **aa. Collection and processing on the basis of your consent**

Your personal data will be collected and processed if you have previously expressly agreed to this and have therefore granted your consent (Art. 6 I 1a of the GDPR).

If we use your data for marketing purposes and we are not entitled to do so on the basis of our justified interest (as described below in cc.), we shall obtain express consent declarations from you to use your data for further marketing purposes.

### **bb. Collection and processing for fulfilling contract duties**

We collect and process your personal data set out in more detail in number 2a for the purposes of initiating contact and fulfilling our contract duties. We process these data on the legal basis of Art. 6 I 1b of the GDPR and therefore to complete pre-contract measures and to fulfil contracts with you or your company. For example, we process your contact details for the purposes of contacting you and other data as required to conclude contracts for projects and services, for the purposes of accounting, invoicing or collecting accounts receivable.

### **cc. Processing on the basis of a justified interest**

In addition, we process your personal data, if required, to protect our justified interests or those of a third party and your interests of basic rights and basic freedoms which require the protection of your personal data, do not outweigh these interests (Art. 6 I 1f of the GDPR). "Third parties" shall mean private individuals or legal entities such as companies, authorities, institutions or other bodies. FEY, the responsible body, and its order processors shall not be "third parties" in this respect (see Art. 4 number 10 of the GDPR).

Your data shall in particular be processed on the basis of a justified interest in the following cases:

- We shall process your data if this is required to lodge legal claims and make a defence in the event of legal disputes.
- Your personal data may have to be processed in some cases relating to the maintenance and care of our IT systems. We assume that we only have an overriding justified interest because this work is designed to guarantee IT security and maintain IT operations.

- When you use our website ([www.fey-lamellenringe.de](http://www.fey-lamellenringe.de)), we collect your IP address and other data. If you go to the above website, you will find details of how your data are used in the privacy policy posted on the site.
- Furthermore, in some cases we send personal data relating to the initiation, fulfilment and termination of our business relationship and data relating to conduct in breach of the contract to Verband der Vereine Creditreformen e.V. ("Creditreform"). Further information about the activities of Creditreform is available online at [www.Creditreform.de](http://www.Creditreform.de).

With this in mind, we assume that our interests override your basic rights and basic freedoms which require the protection of your data.

We process your data exclusively in anonymised form for the further development of our products and for statistical purposes.

#### **dd. Collection and processing on the basis of statutory regulations**

FEY is subject to extensive statutory and regulatory provisions, for example tax laws. The fulfilment of the statutory requirements resulting from this requires your personal data to be collected and processed (Art. 6 Ic of the GDPR). If you do not supply us with the information and documents required, we are entitled not to start or continue the business relationship you would like.

### **3. Sending and disclosing personal data**

We generally do not disclose your personal data to third parties unless you have consented to your data being disclosed or we are entitled or obliged to do so as a result of some other type of permission.

#### **a. Disclosing data to order recipients**

We use order processors in Germany (for example IT service providers or file destruction contractors) to provide our services relating to our products.

#### **b. Sending data to suppliers and forwarders**

We send data to suppliers or forwarders as part of our business relationship with you. We only send the data required for these purposes.

#### **c. Sending data to Verband der Vereine Creditreform e.V.**

As part of our business relationship with you, we send personal data collected from you relating to your application for a business relationship, its fulfilment and termination and data relating to any conduct in breach of the contract to Verband der Vereine Creditreform e.V, Hellersbergstrasse 12, 41460 Neuss, Germany if this is legally permitted.

#### **d. Sending data to public bodies**

Furthermore, we only send data provided by you to those bodies which require them for statutory reasons, for example public bodies and institutions (for example tax authorities), if we have a statutory or sovereign duty to do so.

#### **e. Sending data to a third party country or an international organisation**

No data are sent to countries outside the EU or the EEA (so-called third party countries) unless we are obliged to do so as a result of official or court orders.

#### **f. Automated decision making**

No automated decision-making, including profiling, is used to process the data provided

by you.

#### **4. Storage periods**

We only process and save your personal data as long as we need them, in particular to fulfil our contract or statutory duties. If there is no legal basis for continuing to process your data, we will delete the data or, if this is not possible, block all personal reference to you in our system to comply with data protection regulations. In this respect, we may retain your data, particularly for the following reasons:

- The periods to satisfy archiving duties under commercial and/or fiscal law are a maximum of 6 or 10 years respectively under the statutory regulations. We therefore keep invoicing documents for this period.
- Under the provisions of the German Civil Code (abbreviated to BGB), the statute of limitation regulations may be up to 30 years although the normal statute of limitations is three years. We therefore keep contract documents and documents relating to the contract to comply with these statute of limitation regulations.

#### **5. Rights**

You have extensive rights relating to the processing of your personal data:

##### **a. Right to information (Art. 15 of the GDPR)**

You are entitled to information about the data we have stored, particularly about the reason for the processing and how long the data will be stored.

##### **b. Right to correction (Art. 16 of the GDPR)**

You are entitled to demand incorrect personal data relating to you is corrected without delay. Taking into consideration the purposes of processing, you are entitled to demand incomplete personal data relating to you is completed – including in the form of a supplementary declaration.

##### **c. Right to deletion (Art. 17 of the GDPR)**

You are entitled to demand that we delete your data without delay. We are obliged to delete personal data without delay if one of the following reasons applies:

- The purposes for which the personal data was collected no longer apply.
- You revoke your consent to processing. There is no other legal basis for the processing.
- You object to the processing. There is no other legal basis for the processing.
- The personal data have been processed illegally.
- The deletion of personal data is required to satisfy a legal obligation.

##### **d. Right to restrict processing (Art. 18 of the GDPR, Sec. 35 of the BDSG)**

You are entitled to demand that we restrict the processing if one of the following conditions is satisfied:

- You doubt that the personal data are correct.
- The processing is illegal; however, you refuse to have the data deleted.
- Personal data are no longer required for the purpose of processing; however, you need the data to lodge, exercise or defend legal claims.
- You have lodged an objection to the processing under Art. 21 paragraph 1 of the GDPR. The processing will be restricted for as long as it is not clear whether the justified reasons of the responsible party outweigh your reasons.

**e. Right to data transferability (Art. 20 of the GDPR)**

You are entitled to receive from us the data supplied by you in a structured, conventional and machine-readable format. Forwarding the data to another responsible party must not be prevented.

**f. Right to object (Art. 21 of the GDPR)**

You are entitled, for reasons resulting from your specific situation, to object at any time to the processing of personal data relating to you which takes place as a result of Art. 6 I 1e or f of the GDPR (Art. 21 of the GDPR). We will cease processing your personal data unless we can show binding reasons for the processing which require protection, and which outweigh your interests, rights and freedoms or if the processing is for the purposes of lodging, exercising or defending legal claims. In the event that you object to the use of your data for marketing purposes, we will no longer process your data for these purposes.

If you wish to object to your personal data being processed, send us an email to [datenschutz@fey-lamellenringe.de](mailto:datenschutz@fey-lamellenringe.de) or in writing to **Fey Lamellenringe GmbH & Co. KG**, Josef-Fey-Strasse 2, 86343 Königsbrunn.

**g. Write to complain to the monitoring authority (Art. 13 II d, 77 of the GDPR together with Sec. 19 of the BDSG)**

Furthermore, you have the right to complain if you believe that we are breaching the GDPR or BDSG by processing the personal data relating to you. You may complain to a monitoring authority, for example to the monitoring authority responsible at your place of residence, your place of work or for the location of the data protection breach.

**h. Revocation of your consent (Art. 7 III of the GDPR)**

If the data processing is based on your consent under Art. 6 I 1a and/or Art. 9 IIa (processing special categories of personal data), you are entitled at any time to revoke the mandatory consent for this purpose with effect for the future. This means that data processing activities which took place before your revocation will be unaffected by it. After such revocation, FEY may only continue to process the personal data if the data processing takes place on the basis of another type of permission based on data protection law.

FEY makes every effort to address and remedy enquiries and complaints. In addition to the contacts at FEY set out above, however, you may contact the relevant data protection monitoring authority at any time.

The data protection monitoring authority responsible for FEY Lamellenringe GmbH & Co. KG is:



Bayerisches Landesamt für Datenschutzaufsicht  
Promenade 27 (Schloss)  
91522 Ansbach, Germany  
Web: <http://www.lida.bayern.de>

**Königsbrunn, Februar 2023**

**FEY Lamellenringe GmbH & Co. KG**