



## Data Privacy Statement

We are delighted with your interest in our company. Data privacy is particularly important for the management of Südkupfer Bröckl Handels-GmbH & Co.KG. Generally speaking, using the Internet pages of Südkupfer Bröckl Handels-GmbH & Co.KG is possible without providing any personal data. However, when a data subject wishes to make use of special company services via our website, processing personal data may be necessary. As a general principle, when the processing of personal data is necessary and no legal basis for such processing exists, we obtain the consent of the data subject.

The processing of personal data such as the name, address, e-mail address or telephone number of a data subject is always carried out in accordance with the General Data Protection Regulation and in accordance with the country-specific data protection regulations that apply to Südkupfer Bröckl Handels-GmbH & Co.KG. By means of this privacy policy, our company wishes to inform the public about the nature, scope and purpose of the personal data we collect, use and process. Furthermore, data subjects are informed of their rights by means of this data privacy statement.

As the responsible officer for processing, Südkupfer Bröckl Handels-GmbH & Co.KG has implemented numerous technical and organisational measures to ensure that the personal data processed via this website is protected to the greatest extent possible. Nevertheless, Internet-based data transmissions can, in principle, have security gaps, so that absolute protection cannot be guaranteed. For this reason, each data subject is free to transmit personal data to us by alternative means, such as telephone.

### 1. Definitions

The data privacy statement of Südkupfer Bröckl Handels-GmbH & Co.KG is based on the terms used by the European directive and regulator in the enactment of the General Data Protection Regulation (GDPR). Our data privacy statement should be easy to read and understand for the public as well as for our customers and business partners. To guarantee this, we would like to explain the terms used in advance.

We use the following terms in this data privacy statement:

#### a) Personal data

Personal data refers to any information relating to an identified or identifiable natural person (hereinafter "data subject"). A natural person shall be considered identifiable when he can be identified directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or one or more specific characteristics expressing the physical, physiological, genetic, psychological, economic, cultural or social identity of that natural person.

#### b) Data subject

Data subject refers to any identified or identifiable natural person whose personal data is processed by the responsible data processing officer.

#### c) Processing

Processing refers to any operation or set of operations that is or are carried out with or without the aid of automated processes and that relate to personal data, such as collection, recording, organisation, sorting, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or association, qualification, deletion or destruction.

#### d) Limitation of processing

Limitation of processing is the marking of stored personal data with the purpose of limiting its future processing.

#### e) Profiling

Profiling refers to any automated processing of personal data consisting of the use of such personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects relating to the work performance, economic situation, health, personal preferences, interests, reliability, conduct, whereabouts or movement of that natural person.

#### **f) Pseudonymisation**

Pseudonymisation refers to the processing of personal data in such a way that the personal data can no longer be attributed to a specific data subject without the provision of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures ensuring that the personal data is not attributed to an identified or identifiable natural person.

#### **g) Responsible officer or person responsible for processing**

The responsible officer or the person responsible for processing shall be the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. Where the purposes and means of such processing are stipulated by Union law or by the law of the Member States, the responsible officer, or specific criteria of his appointment, can be designated in accordance with Union law or with the law of the Member States.

#### **h) Data processor**

Data processor is a natural or legal person, public authority, agency or other body who or which processes personal data on behalf of the responsible officer.

#### **i) Recipient**

The recipient is a natural or legal person, public authority, agency or other body to whom personal data is disclosed, regardless of whether that person is a third party or not. However, authorities which may receive personal data in the course of a specific investigation task under Union law or the law of the Member States shall not be considered as recipients.

#### **j) Third parties**

Third party refers to any natural or legal person, public authority, agency or body other than the data subject, the responsible data processing officer, the order processor and the persons authorised to process the personal data under the direct responsibility of the responsible data processing officer or processor.

#### **k) Consent**

Consent refers to any voluntary, informed and unambiguous expression by the data subject of his or her will in the particular case, in the form of a statement or other unequivocal confirmatory act, indicating that he or she consents to the processing of his or her personal data.

### **2. The name and address of the responsible officer**

The responsible officer within the meaning of the General Data Protection Regulation, other data privacy laws applicable in the Member States of the European Union and other provisions that have a data protection-related nature is the Data Protection Commissioner:

Südkupfer Bröckl Handels-GmbH & Co.KG  
Benzstraße 1, 72649 Wolfschlugen  
Telephone: 07022/9566-0,  
E-mail: [datenschutz@suedkupfer.de](mailto:datenschutz@suedkupfer.de)  
Website: [www.suedkupfer.de](http://www.suedkupfer.de)

### **3. Cookies**

The websites of Südkupfer Bröckl Handels-GmbH & Co.KG use cookies. Cookies are text files that are stored on a computer system via an Internet browser.

Numerous Internet pages and servers use cookies. Many cookies contain a so-called cookie ID. A cookie ID is a unique identifier of the cookie. It consists of a string of characters through which Internet pages and servers can be assigned to the specific Internet browser in which the cookie was stored. This enables the visited Internet pages and servers to distinguish the individual browser of the data subject from other Internet browsers that contain other cookies. A particular Internet browser can be recognised and identified by its unique cookie ID.

With the use of cookies, Südkupfer Bröckl Handels-GmbH & Co.KG can provide more user-friendly services to the users of this website, which would not be possible without the setting of cookies.

With a cookie, the information and offers on our website can be optimised in the interests of the user. As already mentioned, cookies enable us to recognise the users of our website. The purpose of this recognition is to make it easier for users to use our website. For example, the user of a website that uses cookies does not have to re-enter his access data each time he visits the website because this is taken

over by the website and the cookie stored on the user's computer system. Another example is the cookie of a shopping basket in the online shop. The online shop remembers the items a customer has placed in the virtual shopping basket by means of a cookie.

The data subject can prevent the setting of cookies by our website at any time with an appropriate setting of the Internet browser used and thereby permanently object to the setting of cookies. Furthermore, cookies that have already been set can be deleted at any time via an Internet browser or other software programmes. This is possible in all common Internet browsers. If the data subject deactivates cookies in the Internet browser used, not all functions of our website may be fully usable under certain circumstances.

#### **4. Collection of general data and information**

The Südkupfer Bröckl Handels-GmbH & Co.KG website collects a series of general data and information each time the website is accessed by a data subject or an automated system. This general data and information is stored in the server's log files. The following can be recorded: (1) browser types and versions used, (2) the operating system of the accessing system, (3) the website from which an accessing system accesses our website (so-called referrer), (4) the sub-sites that are accessed via an accessing system on our website, (5) the date and time of accessing the website, (6) an Internet protocol address (IP address), (7) the Internet service provider of the accessing system and (8) other similar data and information used to avert dangers on our information technology systems in the event of attacks.

When using this general data and information, Südkupfer Bröckl Handels-GmbH & Co.KG does not draw any conclusions about the data subject. This information is needed (1) to correctly deliver the content of our website, (2) to optimise the content and advertising of our website, (3) to ensure the long-term functionality of our information technology systems and the technology of our website, and (4) to provide law enforcement authorities with the information necessary for law enforcement in the event of a cyber attack. Hence, this anonymously collected data and information is evaluated by Südkupfer Bröckl Handels-GmbH & Co.KG both statistically and with the goal of increasing data privacy and data security in our company. Ultimately, this is done to ensure an optimum privacy level for the personal data processed by us. The anonymous data of the server log files is stored separately from all personal data provided by the data subject.

#### **5. Registration on our website**

The data subject has the possibility to register on the website of the responsible data processing officer by providing personal data. Which personal data is then transmitted to the responsible data processing officer in the course of this process is derived from the respective input mask that is used for registration. The personal data entered by the data subject shall be collected and stored solely for internal use by the responsible officer and for own purposes. The responsible officer may arrange for the data to be disclosed to one or more processors, such as a parcel service, which will also use the personal data solely for internal purposes attributable to the responsible officer.

By registering on the website of the responsible data processing officer, the IP address assigned to the data subject by the Internet service provider (ISP), the date and time of registration are also saved. The storage of this data ensues against the backdrop that this is the only way to prevent the misuse of our services and this data and, if necessary, to make it possible to clarify criminal offences committed. In this respect, the storage of this data is necessary to safeguard the responsible data processing officer. As a general rule, this data will not be passed on to third parties unless there is a legal obligation to do so or the data is used for criminal prosecution.

The registration of the data subject by voluntarily providing personal data serves the purpose of the responsible data processing officer to offer the data subject contents or services which, due to the nature of the matter, can only be offered to registered users. Registered persons are free to modify the personal data provided at the time of registration at any time or to have it completely deleted from the database of the responsible data processing officer.

Upon request to do so, the responsible data processing officer shall inform any data subject at any time as to which personal data relating to the data subject is stored. Furthermore, the responsible data processing officer shall correct or delete personal data at the request or notice of the data subject, unless this is contrary to any legal obligation to retain such data. The entire staff of the responsible data processing officer shall be available to the data subject as contact persons in this context.

#### **6. Subscribe to our newsletters**

The Südkupfer Bröckl Handels-GmbH & Co.KG website gives users the opportunity to subscribe to our company newsletter. Which personal data is transferred to the responsible data processing officer for processing when ordering the newsletter results from the input mask used for this purpose.

At regular intervals, Südkupfer Bröckl Handels-GmbH & Co. KG uses a newsletter to inform its customers and business partners about company offers. The newsletter of our company can only be received by the data subject if (1) the data subject has a valid e-mail address and (2) the data subject registers to receive the newsletter. For legal reasons, a first confirmation e-mail in the double opt-in procedure is sent to the e-mail address entered by the data subject for the newsletter dispatch. This confirmation e-mail is used to check whether the owner of the e-mail address as the data subject has authorised receipt of the newsletter.

When registering for the newsletter, we also store the IP address assigned by the Internet Service Provider (ISP) to the computer system used by the data subject at the time of registration, as well as the date and time of registration. Collection of this data is necessary in order to be able to trace the (possible) misuse of the e-mail address of a data subject at a later date, and therefore it serves to legally safeguard the responsible data processing officer.

The personal data collected during registration for the newsletter will only be used to send our newsletter. Furthermore, as might be the case, if necessary for the operation of the newsletter service or registration in this respect, subscribers to the newsletter could be informed by e-mail in the event of changes to the newsletter offering or changes to the technical conditions. The personal data collected as part of the newsletter service will not be passed on to third parties. The subscription to our newsletter can be cancelled by the data subject at any time. The consent to the storage of personal data, which the data subject gives us for the newsletter dispatch can be revoked at any time. A corresponding link is found in each newsletter with the purpose of revoking the consent. Furthermore, it is possible at any time to unsubscribe from receiving the newsletter directly on the website of the responsible data processing officer or to inform the responsible data processing officer of this wish in any other way.

## **7. Newsletter tracking**

The newsletters of Südkupfer Bröckl Handels-GmbH & Co.KG contain so-called tracking pixels. A tracking pixel is a thumbnail image embedded in emails sent in HTML format, and they enable log file recording and analysis. This allows statistical evaluation of the success or failure of online marketing campaigns. Based on the embedded pixel-code, Südkupfer Bröckl Handels-GmbH & Co.KG can recognise whether and when an e-mail was opened by a data subject and which links in the e-mail were accessed by the data subject.

Such personal data collected via the tracking pixels within the newsletters is stored and evaluated by the responsible data processing officer. This is done to optimise the newsletter dispatch and to adapt the content of future newsletters accordingly so as to appeal to the interests of the data subject. This personal data will not be passed on to third parties. Data subjects are entitled, at any time, to revoke the relevant separate declaration of consent submitted via the double opt-in procedure. After revocation this personal data will be deleted by the officer responsible for processing. Südkupfer Bröckl Handels-GmbH & Co.KG automatically interprets a notification that receipt of the newsletter is no longer desired as a revocation.

## **8. Possibility to contact us via the website**

Due to legal regulations, the Südkupfer Bröckl Handels-GmbH & Co.KG website contains information that enables rapid electronic contact with our company and direct communication with us. This also includes a general address of the so-called electronic mail (e-mail address). Where a data subject contacts the responsible data processing officer by e-mail, the personal data transmitted by the data subject shall be stored automatically. Such personal data transmitted voluntarily by a data subject to the responsible data processing officer is stored for the purposes of processing or contacting the data subject. This personal data will not be passed on to third parties.

## **9. Routine deletion and blocking of personal data**

The data processing officer processes and stores personal data of the data subject only for as long as is necessary to achieve the storage purpose or insofar as this has been provided for by the European directive and regulator or another legislator in laws or regulations to which the responsible data processing officer is subject.

When the storage purpose no longer applies or when a storage period prescribed by the European directive and regulator or another competent legislator expires, the personal data shall be blocked or deleted routinely and in accordance with the statutory provisions.

## **10. Privacy policy for the use of Google Analytics (with anonymisation function)**

The data processing officer has integrated the Google Analytics component (with anonymisation function) on this website. Google Analytics is a web analysis service. Web analysis is the ascertainment, collection and evaluation of data on the behaviour of visitors to Internet pages. Among other things, a web analysis service collects data on from which website a data subject has accessed a website (so-called referrers), which subpages of the website have been accessed, or how often and for how long a subpage has been viewed. A web analysis is mainly used to optimise a website and to analyse the costs and benefits of Internet advertising.

The operating company of the Google Analytics component is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA.

The data processing officer uses the addition "\_gat.\_anonymizeIp" for the web analysis via Google Analytics. By means of this addition, the IP address of the Internet connection of the data subject is shortened and anonymised by Google when access to our Internet pages takes place from a member state of the European Union or from another contracting state of the Agreement on the European Economic Area.

The purpose of the Google Analytics component is to analyse the flow of visitors to our website. Google uses the data and information obtained, among other things, to evaluate the use of our website, to compile online reports for us showing the activities on our website and to provide other services in connection with the use of our website.

Google Analytics places a cookie on the information technology system of the data subject. What cookies are has already been explained above. When the cookie is set, Google is able to analyse the use of our website. Each time you access one of the individual pages of this website, which is operated by the responsible data processing officer and on which a Google Analytics component has been integrated, the Internet browser on the information technology system of the data subject is automatically prompted by the respective Google Analytics component to transmit data to Google for the purpose of online analysis. As part of this technical process, Google obtains knowledge of personal data, such as the IP address of the data subject, which Google uses, among other things, to track the origin of visitors and their clicks and, subsequently, this enables the creation of commission statements.

The cookie is used to store personal information such as the access time, the location from which an access originated and the frequency of visits to our website by the data subject. Each time you visit our website, this personal data, including the IP address of the Internet connection used by the data subject, is transferred to Google in the United States of America. This personal data is stored by Google in the United States of America. Google may share this personal information collected via the technical process with third parties.

As already mentioned previously, the data subject can prevent the setting of cookies by our website at any time by means of an appropriate setting of the Internet browser that is used and thereby permanently object to the setting of cookies. Such a setting of the Internet browser used would also prevent Google from setting a cookie on the information technology system of the data subject. In addition, a cookie already set by Google Analytics can be deleted at any time via the Internet browser or other software programmes.

Furthermore, it is possible for the data subject to object to and prevent the collection of data generated by Google Analytics and relating to the use of this website and the processing of this data by Google. For this purpose, the data subject must download and install a browser add-on under the link <https://tools.google.com/dlpage/gaoptout>. This browser add-on informs Google Analytics via JavaScript that no data and information on visits to Internet pages may be transmitted to Google Analytics. The installation of the browser add-on is considered a contradiction by Google. If the data subject's information technology system is deleted, formatted, or reinstalled later on, the data subject must reinstall the browser add-on to disable Google Analytics. When the browser add-on is uninstalled or disabled by the data subject or by another person within this person's control, the browser add-on may be reinstalled or reactivated.

Further information and Google's current privacy policy can be found at <https://www.google.de/intl/de/policies/privacy/> and at <http://www.google.com/analytics/terms/de.html>. Google Analytics is explained in more detail at [https://www.google.com/intl/de\\_en/analytics/](https://www.google.com/intl/de_en/analytics/).

## **11. Privacy policy for the use of Google AdWords**

The data processing officer has integrated Google AdWords into this website. Google AdWords is an Internet advertising service that allows advertisers to place ads both in Google's search engine results and

in the Google advertising network. Google AdWords allows an advertiser to pre-define keywords that will be used to display an ad in Google's search engine results only when the user retrieves a keyword relevant search result with the search engine. In the Google advertising network, the ads are distributed to relevant Internet sites using an automatic algorithm and in accordance with the keywords defined beforehand.

The company operating the Google AdWords services is Google Inc, 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA.

The purpose of Google AdWords is to promote our website by displaying advertisements of interest on third-party websites and in the search engine results of Google and by displaying third-party advertisements on our website.

When a data subject reaches our website via a Google advertisement, Google stores a so-called conversion cookie on the information technology system of the data subject. What cookies are has already been explained above. A conversion cookie loses its validity after thirty days and does not serve to identify the data subject. If the cookie has not yet expired, the conversion cookie is used to track whether certain subpages, such as the shopping cart of an online shop system, have been accessed on our website. The conversion cookie enables both us and Google to track whether a data subject who came to our website via an AdWords advertisement generated turnover, i.e. completed or cancelled a purchase of goods.

The data and information collected through the use of the conversion cookie is used by Google to compile visit statistics for our website. These visit statistics are, in turn, used by us to determine the total number of users who were referred to us via AdWords ads, i.e. to determine the success or failure of the respective AdWords ad and to optimise our AdWords ads for the future. Neither our company, nor other Google AdWords advertisers receive information from Google that could be used to identify the data subject.

The conversion cookie is used to store personal information such as the Internet pages visited by the data subject. Accordingly, each time you visit our website, personal data, including the IP address of the Internet connection used by the data subject, is transmitted to Google in the United States of America. This personal data is stored by Google in the United States of America. Google may share this personal information collected via the technical process with third parties.

As already mentioned previously, the data subject can prevent the setting of cookies by our website at any time by means of an appropriate setting of the Internet browser that is used and thereby permanently object to the setting of cookies. Such a setting of the Internet browser used would also prevent Google from setting a conversion cookie on the information technology system of the data subject. In addition, a cookie already set by Google AdWords can be deleted at any time via the Internet browser or other software programmes.

Furthermore, the data subject has the possibility to object to the interest-related advertising by Google. To do this, the data subject must access the link [www.google.de/settings/ads](http://www.google.de/settings/ads) from any Internet browser he or she uses and make the desired settings there.

Further information and the valid data protection regulations of Google can be found via <https://www.google.de/intl/de/policies/privacy/>.

## 12. Google Remarketing

This website uses the remarketing function of Google Inc. ("Google"). This function is used to present interest-related advertisements to visitors of the website within the framework of the Google advertising network. The visitor's browser stores "cookies", which are text files placed on your computer, and which allow the visitor to be identified when the visitor visits websites that are part of Google's advertising network. These pages may then display advertisements to the visitor that refer to content previously viewed by the visitor on websites that use Google's remarketing function. According to our own information, Google does not collect any personal data during this process. When you still do not wish to have the function, [Remarketing by Google](#) you can deactivate it by the appropriate settings t <http://www.google.com/settings/ads>. Alternatively, you can disable the use of cookies for interest-based advertising through the Advertising Network Initiative by following the instructions t [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp).

For more information about Google Remarketing and Google's privacy policy, please visit the following page: <http://www.google.com/privacy/ads/>.

## 13. Google AdSense

Our website uses Google AdSense, an online advertising service provided by Google Inc. ("Google"). Google AdSense uses "cookies", which are text files placed on the user's computer, to help the website

analyse how users use the site. Google AdSense also uses so-called web beacons (invisible graphics). Through these web beacons, information such as visitor traffic on the pages of this offer can be evaluated. The information generated by cookies and web beacons about the use of this website (including the user's IP address) and the delivery of advertising formats will be transmitted to and stored by Google on servers in the United States. This information can be passed on by Google to Google's contractual partners. However, Google will not combine your IP address with other data stored by you.

Users can prevent the installation of Google AdSense cookies in various ways:

- a) by setting the browser software accordingly;
- b) by deactivating the interest-based ads on [Google](#);
- c) by deactivating the interest-based advertisements of the providers that are part of the self-regulatory campaign "[About Ads](#)";
- d) by permanent deactivation through a browser plug-in.

The settings under b) and c) are deleted when cookies are deleted in the browser settings.

Further information on data protection and cookies for advertising on Google AdSense can be found in Google's data protection declaration [data privacy policy of Google](#), in particular at the following links:

<http://www.google.de/policies/privacy/partners/>  
<http://www.google.de/intl/de/policies/technologies/ads>  
<http://support.google.com/adsense/answer/2839090>

#### **14. Legal basis of the processing**

Art. 6 I lit. a GDPR serves our company as a legal basis for processing operations in which we obtain consent for a specific processing purpose. When the processing of personal data is necessary for fulfilment of a contract, where the contracting party is the data subject, as is the case, e.g. with processing activities that are necessary for the delivery of goods or the provision of other services or counterperformance, the processing is based on Art. 6 I lit. b GDPR. The same applies to those processing activities that are necessary for carrying out pre-contractual measures, e.g. in cases of enquiries about our products or services. When our company is subject to comply with a legal obligation that requires the processing of personal data, such as, e.g. for the fulfilment of tax obligations, the processing is based on Art. 6 I c GDPR. In rare cases, the processing of personal data may be necessary so as to protect the vital interests of the data subject or another natural person. This would, e.g., be the case if a visitor to our company were injured and his/her name, age, health insurance data or other vital information would have to be passed on to a doctor, hospital or other third party. Then the processing would be based on Art. 6 I lit. d GDPR. Ultimately, processing activities could be based on Art. 6 I lit. f GDPR. Processing activities that are not covered by any of the aforementioned legal bases are based on this legal basis when the processing is necessary so as to safeguard a legitimate interest of our company or a third party, provided the interests, fundamental rights and fundamental freedoms of the data subject do not predominate. We are allowed such processing activities, in particular because they were specifically mentioned by the European legislator. In this respect, the legislator took the view that a justified interest could be assumed if the data subject is a customer of the responsible data processing officer (recital 47 sentence 2 GDPR).

#### **15 Rights of the data subject**

##### **a) Right to confirmation**

As granted by the European directive and regulator, any data subject shall have the right to obtain confirmation from the responsible data processing officer as to whether personal data concerning him or her is being processed. When a data subject wishes to exercise this right of confirmation, he or she may, at any time, contact an employee of the responsible data processing officer.

##### **b) Right of access**

As granted by the European directive and regulator, any data subject impacted by the processing of personal data has the right to obtain information from the responsible data processing officer on the stored personal data relating to him or her, and to receive a copy of that information. This must be provided free of charge and at any time. In addition, the European directive and regulator has granted the data subject access to the following information:

- the purposes of processing
- the categories of personal data processed

- the recipients or categories of recipients to whom the personal data has been or will be disclosed, in particular recipients in third countries or international organisations
- if possible, the planned duration for which the personal data will be stored or, if this is not possible, the criteria for determining that duration
- the existence of a right to rectification or deletion of the personal data concerning the data subject or to the restriction of the processing carried out by the responsible data processing officer or of a right to object to such processing
- the existence of a right of complaint to a supervisory authority
- if the personal data is not collected from the data subject: all available information on the origin of the data
- the existence of automated decision-making, including profiling, in accordance with Article 22 Par.1 and 4 GDPR and - at least in these cases - meaningful information on the logic involved and the scope and intended impact of such processing on the data subject.

The data subject shall also have a right of access to information as to whether personal data has been transferred to a third country or to an international organisation. If this is the case, the data subject also has the right to obtain information on the appropriate safeguarding measures taken in connection with the data transfer.

If a data subject wishes to exercise this right to information, he or she may contact a member of staff of the responsible data processing officer at any time.

### **c) Right to rectification**

As granted by the European directive and regulator, any data subject impacted by the processing of personal data has the right to rectification of inaccurate personal data concerning him or her without delay. Furthermore, taking into account the purposes of the processing, the data subject shall have the right to demand the completion of incomplete personal data, also by means of a supplementary statement.

If a data subject wishes to exercise this right of rectification, he or she may, at any time, contact a member of staff of the responsible data processing officer.

### **d) Right to cancellation (right to be forgotten)**

As granted by the European directive and regulator, any data subject impacted by the processing of personal data has the right to require the responsible data processing officer to delete personal data concerning him or her without delay, when one of the following reasons applies and provided the processing is not necessary:

- the personal data has been collected for such purposes or processed in another way for which it is no longer necessary.
- the data subject revokes his or her consent that the processing as referred to in Article 6(1) letter a GDPR or Art. 9 exp. 2 letter a GDPR was based on, and another legal basis for the processing isn't present.
- in accordance with Art. 21 Par. 1 GDPR, the data subject objects to the processing and there are no overriding legitimate reasons for the processing, or the data subject objects to the processing in accordance with Art. 21 Par. 2 GDPR.
- the personal data was processed unlawfully.
- the deletion of the personal data is required for the fulfilment of a legal obligation in accordance with Union law or the law of the Member States that the responsible data processing officer is subject to.
- the personal data was collected in relation to the services offered by the Information Society in accordance with Art. 8 Par. 1 GDPR.

When one of the reasons as mentioned above is applicable and a data subject wishes to have personal data that is stored at Südkupfer Bröckl Handels-GmbH & Co.KG deleted, he can contact an employee of the responsible data processing officer at any time. The Südkupfer Bröckl Handels-GmbH & Co.KG employee shall ensure that the request for deletion is complied with immediately.

When the personal data has been made public by Südkupfer Bröckl Handels-GmbH & Co.KG, and if our company, as the responsible data processing officer pursuant to Art. 17 Par. 1 GDPR, is obliged to delete the personal data, Südkupfer Bröckl Handels-GmbH & Co.KG, by taking into account the available technology and implementation costs, shall take the appropriate measures, also those of a technical nature, to inform other responsible for data processing officers, who process the published personal data,

that the data subject has requested these other officers responsible for data processing to delete all links to this personal data or copies or replications of this personal data, subject to the proviso that the processing is not necessary. The employee of Südkupfer Bröckl Handels-GmbH & Co.KG will take the necessary steps in individual cases.

#### **e) Right to restriction of processing**

As granted by the European directive and regulator, any data subject impacted by the processing of personal data has the right to request the responsible data processing officer to restrict the processing, provided one of the following conditions is met:

- the accuracy of the personal data is disputed by the data subject, and this applies for a time period that will enable the responsible data processing officer to verify the accuracy of the personal data.
- the processing is unlawful, the data subject does not wish the deletion of the personal data and instead demands restriction of the use of the personal data.
- the responsible data processing officer no longer requires the personal data for the purposes of processing, but the data subject requires it for the assertion, exercise or defence of legal claims.
- the data subject has objected to the data processing in accordance with Art. 21 Par. 1 GDPR and it has not yet been determined whether the legitimate reasons of the responsible data processing officer outweigh those of the data subject.

When one of the aforementioned prerequisites are present, and a data subject desires the restriction of personal data stored at Südkupfer Bröckl Handels-GmbH & Co.KG, he or she can contact an employee of the responsible data processing officer at any time. The employee of Südkupfer Bröckl Handels-GmbH & Co.KG shall arrange for the processing to be restricted.

#### **f) Right to data transferability**

As granted by the European directive and regulator, any data subject impacted by the processing of personal data has the right to obtain personal data concerning him or her that has been provided by the data subject to a responsible data processing officer and this includes the right to receive this data in a structured, common and machine-readable format. He or she also has the right to communicate this data to another data processing officer without being hindered by the responsible data processing officer to whom the personal data has been made available, provided that the processing is based on the consent pursuant to Art. 6 Par. 1 Letter a GDPR or Art. 9 Par. 2 Letter a GDPR or on a contract pursuant to Art. 6 Par. 1 Letter b GDPR, and the processing is carried out using automated procedures, subject to the proviso that the processing is not necessary for performing a task in public interest or practising an act of official authority entrusted to the responsible data processing officer.

Furthermore, when exercising his or her right to data transferability in accordance with Art. 20 Par. 1 GDPR, the data subject has the right to have the personal data transmitted directly to another responsible data processing officer by a responsible data processing officer, insofar as this is technically feasible and insofar as the rights and freedoms of other persons are not affected by this.

In order to exercise the right to data transfer, the data subject may, at any time, contact a Südkupfer Bröckl Handels-GmbH & Co.KG employee.

#### **g) Right of objection**

As granted by the European directive and regulator, any data subject impacted by the processing of personal data has the right to object to the processing of personal data concerning him/her under Article 6(1)(e) or (f) GDPR, at any time and for reasons related to his/her particular situation. This also applies to profiling that is based on these provisions.

Südkupfer Bröckl Handels-GmbH & Co. KG will no longer process the personal data in case of objection, unless we can provide proof of compelling reasons for the processing that are worthy of protection and outweigh the interests, rights and freedoms of the data subject, or when the processing serves the assertion, exercise or defence of legal claims.

When Südkupfer Bröckl Handels-GmbH & Co.KG processes personal data with the purpose of conducting direct advertising, the data subject has the right to object to the processing of personal data for the purpose of such advertising at any time. This also applies to profiling to the extent that it is related to such direct marketing. When the data subject objects to the processing by Südkupfer Bröckl Handels-GmbH & Co.KG for the purposes of direct marketing, Südkupfer Bröckl Handels-GmbH & Co.KG will no longer process the personal data for these purposes.

In addition, for reasons arising from his particular situation, the data subject has the right to object to the processing of personal data relating to him or her which is carried out by Südkupfer Bröckl Handels-GmbH & Co.KG for scientific or historical research purposes or for statistical purposes in accordance with Article 89(1) GDPR, unless such processing is necessary for performing a task in the public interest.

To exercise the right to object, the data subject may contact any employee of Südkupfer Bröckl Handels-GmbH & Co.KG or another employee directly. In connection with the use of information society services, notwithstanding Directive 2002/58/EC, the data subject is also free to exercise his or her right of objection by means of automated procedures that use technical specifications.

#### **h) Automated decisions in individual cases, including profiling**

Any data subject impacted by the processing of personal data has the right under the European directive and regulator not to be subject to a decision based solely on automated processing, including profiling, which results in legal effects upon him or her or significantly affects him or her in a similar manner, provided that the decision (1) is not necessary for the conclusion or performance of a contract between the data subject and the responsible data processing officer, or (2) is authorised by Union or national law or by the Member States to which the responsible data processing officer is subject and which provides for adequate measures to safeguard the rights and freedoms and the legitimate interests of the data subject, or (3) is taken with the express consent of the data subject.

If the decision (1) is necessary for the conclusion or performance of a contract between the data subject and the responsible data processing officer or (2) is taken with the express consent of the data processing officer, the decision shall be taken by the responsible data processing officer. Südkupfer Bröckl Handels-GmbH & Co.KG shall take appropriate measures to safeguard the rights and freedoms as well as the legitimate interests of the data subject, including at least the right to obtain the intervention of a person on the part of the person responsible, to state his or her own position and to challenge the decision.

When the data subject wishes to exercise rights relating to automated decisions, he or she may do so at any time by contacting an employee of the responsible data processing officer.

#### **i) Right to revoke consent under data privacy law**

As granted by the European directive and regulator, any data subject impacted by the processing of personal data has the right to revoke consent to the processing of personal data at any time.

When the data subject wishes to exercise his or her right to revoke consent, he or she may do so at any time and by contacting an employee of the responsible data processing officer.

### **16 Legitimate interests in the processing pursued by the responsible data processing officer or by a third party**

When the processing of personal data is based on Article 6 I f GDPR, our legitimate interest is the conduct of our business for the benefit of all our employees and shareholders.

### **17 Storage duration of the personal data**

The criterion for the storage duration of personal data is the respective legal retention period. After expiry of this period, the corresponding data will be deleted routinely, unless it is no longer required for contract fulfilment or initiation.

### **18 Legal or contractual provisions governing the provision of personal data; necessity for the conclusion of the contract; obligation of the data subject to provide the personal data; possible consequences of not providing data**

We would like to make you aware that the provision of personal data is, in part, required by law (e.g. tax regulations) or may arise from contractual provisions (e.g. information on the contractual partner). Sometimes, for a contract to be concluded, it may be necessary for a data subject to provide us with personal data that must subsequently be processed by us. For example, the data subject is obliged to provide us with personal data if our company concludes a contract with him or her. Failure to provide personal data would mean that the contract could not be concluded with the data subject. The data subject must contact one of our employees prior to the provision of personal data by the data subject. The responsible data processing officer will inform the data subject on a case-by-case basis whether the provision of the personal data is required by law or contract, or is necessary for the conclusion of a contract, whether there is an obligation to provide the personal data and what consequences the non-availability of the personal data would have.