

## Privacy Policy / Data Protection Declaration of Adams Armaturen Service GmbH

Version dated 25.5.2018

Adams Armaturen Service GmbH (hereinafter: "Adams" or "we") takes the protection of your personal data seriously. With this Privacy Policy we would like to inform you in detail about which of your data we collect, process and use as well as the purpose of use of such data when you contact us, in the context of (pre-) contractual negotiations, as a user of our websites, our applications or through other interactions with us.

Your personal data will be processed in accordance with the relevant provisions of the European Data Protection Basic Regulation (Datenschutzgrundverordnung, hereinafter: DS-GVO), the German Federal Data Protection Act (Bundesdatenschutzgesetz, hereinafter: BDSG) and the German Telecommunications Act (Telekommunikationsgesetz, hereinafter: TKG).

This Privacy Policy applies to all Adams interactions with you, unless otherwise stated. If you contact Adams as a representative of a company, please also pass this information on to the current and future authorized representatives and beneficial owners in your company, as well as any co-obligated persons. These include, for example, the Executive Board, management, authorised signatories or project managers.

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

Responsibility for the lawful collection, processing and use of your data lies with Adams Armaturen Service GmbH, Baukauer Str. 55, 44653 Herne, email: [dsgvo@adams-armaturen.de](mailto:dsgvo@adams-armaturen.de) (responsible body)

Our data protection officer in accordance with Art. 30 (1) a) DS-GVO is Mr. Andreas Reinke, c/o arbeitgeber ruhr GmbH, Königsallee 67, 44789 Bochum.  
Email: [reinke@datenschurzbeauftragter.ruhr](mailto:reinke@datenschurzbeauftragter.ruhr) (company data protection officer).

### 2 What information do you need to provide and what data sources does Adams use and process?

#### a) Cookies and general data

Our websites use cookies, subject to your active consent. Cookies are text files which are stored on a computer system via an Internet browser.

You can prevent the setting of cookies by our web pages at any time by means of an appropriate setting of the Internet browser used and thus the setting of cookies permanently; the cookies are only set if you agree to the setting of cookies by clicking the corresponding checkbox.

Through our use of cookies, we can provide you with more user-friendly services that would not be possible without cookies.

By means of a cookie, the information and offers on our website can be optimized for you as the user. Cookies enable us to recognize you as a user of our website. The purpose of this recognition is, for example, that you do not have to enter access data again each time you visit the website because this is taken over by the website and the cookie stored on your computer system.

Furthermore, cookies that have already been set can be deleted at any time via an Internet browser or other software programs. This is possible in all common internet browsers. If the person concerned / you deactivate/s the setting of cookies in the Internet browser used, not all functions of our Internet site may be fully usable.

Every time you visit our website, our website collects a series of general data and information. This general data and information is stored in the log files of the server.

We may record (1) the browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (so-called referrer), (4) the subwebsites which are accessed via an accessing system on our website, (5) the date and time of access to the Website, (6) an Internet Protocol address (IP address), (7) the Internet service providers of the accessing system, and (8) other similar data and information used for security purposes in the event of attacks on our information technology systems.

When using this general data and information, we do not draw any conclusions about you. Rather, this information is required to (1) correctly deliver the contents of our website, (2) optimize the contents of our website and the advertising for it, (3) ensure the permanent functionality of our information technology systems and the technology of our website, and (4) provide law enforcement authorities with the information necessary for criminal prosecution in the event of a cyber attack. This anonymously collected data and information is evaluated statistically and with the aim of increasing data protection and data security in our company in order ultimately to ensure an optimal level of protection for the personal data processed by us. The anonymous data of the server log files are stored separately from all personal data provided by a person concerned.

## **b) Personal Data**

In principle, no personal data is required for the use of the [www.adams-armaturen.de](http://www.adams-armaturen.de) website. The use of certain services or products provided by us requires the provision of the personal data individually requested for there.

You can reject this at any time.

If you decide not to provide any data which is necessary for the provision of the services or products or the establishment and execution of a business relationship and the fulfilment of the associated contractual obligations or to the collection of which we are legally obliged we will generally not be able to provide the services or products or we will have to refuse the

conclusion or execution of new contracts or no longer be able to execute an existing contract and may have to terminate it.

If you wish to establish or continue a business relationship with us, you must provide the personal data required for the establishment or continuation of a business relationship with us and its fulfilment by us. This also applies in particular if you wish to use certain services or products (e.g. applications) or information from Adams, the use or decryption of which requires us to provide you with an individualized access code.

This collected data regularly includes the following information: Your name, your position in your company and your professional contact details. We collect your first and last name, your (also professional) e-mail address, your (also professional) postal address including the country from which you are requesting, your (also professional) telephone numbers (also mobile) and other job-related contact data together with the data and attachments provided by you as well as in free text fields of contact forms.

In the case of a job application to Adams, it may be necessary to provide further information (e.g. driving licence or other qualifications).

Where we provide passwords, password notices and similar security information to you we collect and facilitate such data used for authentication and access to the content or application or other information or communication platforms (e.g. for file sharing or telephone conferences) to assign the use of the content or systems as provided by us to you.

In individual cases, e.g. when visiting our plant, the collection of additional data, e.g. your ID data, may become necessary.

In addition to this data provided by you, we process data that we have received from other companies in the Adams Group (e.g. Adams Armaturen GmbH) or from other third parties (e.g. Creditreform) as permitted (e.g. to fulfil contracts or on the basis of your consent).

To offer some of our services, we offer links to third party providers via our website [www.adams-armaturen.de](http://www.adams-armaturen.de) and enable them to place content on our pages. The setting of these external links does not mean that we adopt the content behind these links as our own. These third party providers may also place cookies on your computer and collect information about your online activities on websites or online services if you use appropriate links.

These currently include the following companies:

Facebook ([www.facebook.de](http://www.facebook.de)), Xing ([www.xing.de](http://www.xing.de)), Instagram ([www.instagram.com](http://www.instagram.com)), Herner Turnclub ([www.htc-bb.de](http://www.htc-bb.de)), VfL Bochum ([www.vfl-bochum.de](http://www.vfl-bochum.de)) and Youtube ([www.youtube.com](http://www.youtube.com)).

Our privacy policy does not extend to the websites of third parties. We have no influence on the further processing of your data collected and processed there by these third parties. For

more information on each of such third company's practices, including the options offered, click on the company name above.

### **3) Adams processes your data for what purpose and on what legal basis?**

We collect the aforementioned personal data in accordance with the relevant provisions of the DS-GVO, the BDSG and TKG.

#### **3.1 Processing for the fulfilment of contractual obligations (Article 6 para. 1 b DS-GVO)**

The processing of personal data takes place for the purpose of establishing of (pre-) contractual business relationships, for the maintenance of business relationships or for the execution of existing contracts between you and us.

The purpose of data processing primarily depends on your product interests and may include, among other things, demand analyses, consulting, execution of service, work delivery or purchase contracts. Your previous purchasing behaviour is also recorded.

#### **3.2 Processing within the framework of the balancing of interests (Article 6 para. 1 f DS-GVO)**

Where necessary, we process your data beyond the actual fulfilment of your request or the contract to protect the legitimate interests of us or third parties. Examples:

- Consultation and data exchange with credit agencies (e.g. Creditreform) to determine creditworthiness and default risks.
- Review and optimization of procedures for needs analysis, also for direct customer approach; incl. customer segmentation and calculation of contract probabilities,
- Advertising or market and opinion research, unless you have objected to the use of your data,
- Enforcement of legal claims and defence in legal disputes,
- Ensuring our IT security and IT operations,
- Prevention and investigation of criminal offences,
- Video surveillance in our business and production rooms to safeguard house rights, to collect evidence in the case of industrial espionage or to prove that we have fulfilled the contract properly and professionally,
- measures for building and system security (e.g. access controls),
- Measures to secure the domiciliary rights,
- Measures for business management and further development of our products and services.

#### **3.3 Data processing on the basis of your consent (Article 6 para. 1 a DS-GVO)**

If you have confirmed your consent to process personal data for specific purposes (e.g. establishment or continuation of a business relationship, application, inclusion in newsletters,

invitations to trade fairs, etc.) to us, the legality of such processing is given on the basis of your consent.

With your consent, you authorize us to use your data in accordance with this privacy policy / data protection declaration for the duration of the business relationship or the legally binding storage and documentation obligations.

Any consent given can be revoked at any time.

This also applies to the revocation of declarations of consent given to us before the DS-GVO and the new BDSG, i.e. before 25 May 2018.

Please note that the revocation will only take effect in the future.

Processing that took place before the revocation is not affected by this.

You can request a status overview of the consents you have given us at any time, informally and free of charge.

### **3.4 Data processing on the basis of legal requirements (Article 6 para.1c DS-GVO) or in the public interest (Article 6 para.1e DS-GVO)**

As a company operating worldwide, we are subject to various legal obligations, i.e. legal requirements (e.g. of a customs or export law nature). The purposes of processing your data therefore includes, among other things, identity verification, the prevention of fraud and money laundering, the fulfilment of fiscal control and reporting obligations as well as the assessment and management of (also of default) risks in the company and in the group, also with regard to export controls.

## **4. Who gets access to your data through Adam's?**

We provide access to your data to those departments that need same to fulfil our (pre- and) contractual and legal obligations. This also includes passing on of data to the relevant departments within the Adams group of companies. Service providers and vicarious agents used by us in accordance with Art. 28 DS-GVO may also receive data from us for this purpose if the vicarious agents observe our written data protection instructions or comparable data protection obligations and prove that the data is processed in accordance with the DS-GVO, the BDSG or the comparable legal data protection level in Europe.

In case of a legal or official obligation, the aforementioned information will continue to be passed on to public bodies and institutions.

Other data recipients may also be those bodies for which you have given us your consent to the transfer of data or for which you have exempted us from a duty of confidentiality or by giving your consent.

With your consent to this data protection declaration, you always authorise us to pass on the data to companies or data processors for the purpose of the aforementioned use, insofar as these are subject to the above obligation.

Please contact us at [dsgvo@adams-armaturen.de](mailto:dsgvo@adams-armaturen.de) for more information.

## **5. How long does Adams store your data?**

Starting regularly with the initiation of business relationships, Adams will, if necessary, store your personal data for the duration of the business relationship, including the entire processing of a contractual cooperation. The contractual cooperation, especially if it is based on framework agreements or continuing obligation, is regularly for years.

Furthermore, Adams is subject to various legal retention and documentation obligations. These are derived from the German Commercial Code, the German Civil Code, the Money Laundering Act, labour law regulations and relevant customs regulations or regulations relating to the export of goods which we are happy to explain in more detail on a case-by-case basis.

Corresponding legal storage and documentation obligations regularly amount to between 2 and 10 years.

In addition we store personal data if this is necessary in connection with claims asserted against us (statutory limitation period according to §§ 195 BGB up to 30 years).

In the case of a job application to Adams, you authorize us, with your consent to this Privacy Policy, to store your documents for up to 18 months from receipt of the application. In the event of a subsequent employment, the application documents will be taken from the personnel files and kept within the scope of the legal retention obligations, but always for the duration of your employment with Adams.

In principle, your personal data will be deleted or made anonymous as soon as it is no longer required for the aforementioned purposes and Adams is not obliged to store it further on the basis of statutory documentation and storage obligations. Deletion shall also take place if you assert your claim for deletion in accordance with Clause 6 below.

## **6. What right to information and deletion do you have?**

With regard to the processing of personal data, you may request information on your personal data pursuant to Article 15 DS-GVO, request the correction of your personal data pursuant to Article 16 DS-GVO, request the deletion of your personal data pursuant to Article 17 DS-GVO, request the restriction of the processing of your personal data pursuant to Article 18 DS-GVO and request the transfer of certain personal data to you or a third party designated by you (right to data transferability) pursuant to Article 20 DS-GVO. Regarding the right to information and deletion, the restrictions according to §§ 34 and 35 BDSG apply.

You can assert these rights against us free of charge via one of the following contact options:

Adams Armaturen Service GmbH, Baukauer Str. 55, 44653 Herne, email: [dsgvo@adams-armaturen.de](mailto:dsgvo@adams-armaturen.de)

or

to the data protection officer of Adams Armaturen Service GmbH, Mr. Andreas Reinke, c/o employer ruhr GmbH, Königsallee 67, 44789 Bochum.

Email: [reinke@datenschurzbeauftragter.ruhr](mailto:reinke@datenschurzbeauftragter.ruhr)

At the same time, according to Art. 77 DS-GVO in conjunction with 19 BDSG a right of appeal with the data protection supervisory authority of either the (federal) state in which they have their domicile or habitual abode or with the North Rhine-Westphalia State Commissioner for Data Protection and Freedom of Information, P.O. Box 20 04 44, 40102 Düsseldorf, Tel.: 0211/38424-0, Fax: 0211/38424-10, E-Mail: [poststelle@ldi.nrw.de](mailto:poststelle@ldi.nrw.de) to.

## **7. No automated decision making**

Adams does not use automated decision making according to Art. 22 DS-GVO for the establishment or execution of business relationships. In the case of an irregular deviation from this procedure, you will be separately informed by us to the extent required by law.

## **8. Right of objection according to Art. 21 DS-GVO**

On the basis of reasons arising from your particular situation, you have the right to object at any time to the processing of personal data concerning you, which are collected on the basis of Article 6 paragraph 1G DS-GVO and Article 6 paragraph 1S S DS-GVO.

If you file an objection, Adams will no longer process your personal data unless we can prove compelling reasons worthy of protection for the processing, which transferred their interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

In individual cases we process your personal data for direct advertising (e.g. newsletters or invitations to trade fairs). You have the right to object at any time to the processing of personal data concerning you for the purpose of such direct marketing.

The objection can be filed free of charge at any time via one of the following contact options: Adams Armaturen Service GmbH, Baukauer Str. 55, 44653 Herne, email: [dsgvo@adams-armaturen.de](mailto:dsgvo@adams-armaturen.de)

Or

Attn. of the data protection officer of Adams Armaturen Service GmbH, Mr. Andreas Reinke, c/o employer ruhr GmbH, Königsallee 67, 44789 Bochum.

Email: [reinke@datenschurzbeauftragter.ruhr](mailto:reinke@datenschurzbeauftragter.ruhr)

### **9 Changes to this data protection declaration**

We reserve the right to amend this data protection declaration at any time in compliance with the applicable data protection regulations. We will notify you of significant changes to this Privacy Policy by posting a prominent notice on our website.