

A. Privacy Statement according to GDPR

I. Name and address of the responsible party

The responsible party in terms of the General Data Protection Regulation and other national data protection laws of member states and other data protection provisions is:

*SPAUN electronic GmbH & Co. KG
Byk-Gulden-Str. 22
78224 Singen
Germany
Phone: +49 (0) 7731 8673-0
Email: info@spaun.de
Website: www.spaun.de*

II. General information on Data Processing Contract

1. Scope of processing of the personal data

In principle, we process our users' personal data only if it is required for provision of a functional website and for our contents and services. Our users' personal data is processed regularly only after the consent of the user. An exception in such cases is where a prior obtaining of consent is not possible for factual reasons and the processing of the data is permitted by legal specifications.

Personal data of concerned interested parties, customers or partners may be processed only for justification, execution and termination of a contract. This also includes the assistance of the contract partner, as long as it is in relation with the purpose of contract. Prior to a contract – in the contract initiation phase – the processing of personal data for creating offers, the preparation of purchase requests or for fulfilling other wishes of the interested parties aimed at conclusion of contract is allowed. Interested parties may be contacted during the contract initiation by using the data that they have communicated. Possible restrictions voiced by the interested parties must be respected.

2. Data transfer at the end of contract

We transfer personal data to third parties only if it is necessary within the framework of contract execution, for example, to the companies entrusted with the delivery of the goods or the bank authorised to handle the payment. There is no further transfer of the data or only when you have expressly permitted the transfer. Your data is not passed on to third parties without the express consent, for instance, for promotional purposes.

The basis for the data processing is Article 6 section 1 lit. b of GDPR, which permits the processing of data for fulfilling a contract or pre-contractual actions.

3. Legal basis for the processing of the personal data

Provided we obtain consent of the concerned person for the processing procedures of personal data, Article 6 section 1 lit. a of EU's General Data Protection Regulation (GDPR) acts as the legal basis.

For the processing of personal data that is required to fulfil a contract whose contracting party is the concerned person, the Article 6 section 1 lit. b of GDPR acts as the legal basis. This also applies to processing procedures that are required to execute the pre-contractual actions.

Provided, processing of personal data is necessary to fulfil a legal obligation that governs our company, Article 6 section 1 lit. c of GDPR acts as the legal basis.

In the event that vital interests of the concerned person or another natural person make the processing of personal data necessary, the Article 6 section 1 lit. d of GDPR acts as the legal basis.

If the processing is necessary to safeguard a legitimate interest of our company or a third party and if the interests, fundamental rights and fundamental freedoms do not outweigh the former interest, then the Article 6 section 1 lit. f of GDPR acts as the legal basis for the processing.

4. Data deletion and duration of storage

The personal data of the concerned person is deleted or blocked as soon as the purpose of storage is inapplicable. Data can furthermore be stored if it was stipulated by the European or national legislative body in regulations, laws or other specifications of the union to which the responsible party is liable. The data is also blocked or deleted if a storage term prescribed by the stated standards expires, unless there is a necessity to continue storing the data to conclude or fulfil a contract.

III. Provision of website and creation of log files

1. Description and scope of data processing

With every access of our internet site, our system automatically collects data and information of the computer system of the accessing computer.

Following data is collected in the process:

- (1) Information about the browser type and the version used
- (2) The operating system of the user
- (3) The internet service provider of the user
- (4) The IP address of the user
- (5) Date and time of access
- (6) Websites from which the user's system has reached our internet site
- (7) Websites that were accessed by the user's system using our website

The data is also saved in the log files of our system. This data is not stored along with other personal data of the user.

2. Legal basis for the data processing

Legal basis for the temporary storage of data and the log files is Article 6 section 1 lit. f of GDPR.

3. Purpose of data processing

The temporary storage of IP address by the system is necessary to enable the delivery of the website to the computer of the user. For this, the IP address of the user must remain saved for the duration of the session.

The storage in log files takes place to ensure the functionality of the website. In addition, the data helps us to optimise the website and to ensure the security of our information technical systems. Analysis of the data for marketing purposes does not take place in this context.

We also have our legitimate interest in the data processing according to Article 6 section 1 lit. f of GDPR in these purposes.

4. Duration of storage

The data is deleted as soon as it is no longer necessary for attaining the aim of its collection. This deletion happens when the respective session ends in case the data is recorded for provision of the website.

In case of storage of the data in log files, this deletion happens after seven days at the latest. Further storage is possible. In this case, the IP addresses of the user are deleted or distorted, so that association of the accessing client is no longer possible.

5. Option of objection and deletion

The collection of data for provision of the website and the storage of data in log files is mandatory for the operation of the internet site. Consequently, the user does not have an option of objection.

IV. Use of cookies

a) Description and scope of data processing

Our website does not use cookies.

V. Newsletter

1. Description and scope of data processing

There is an option of subscribing to a free newsletter on our website. As a result, the data from the input screen is communicated to us while registering for the newsletter.

Additionally, the following data is collected at the time of registration:

- (1) IP address of the accessing computer
- (2) Date and time of registration
- (3) Email address

Your consent is obtained and reference is given to this privacy statement for the processing of data in the course of the registration procedure.

If you buy goods or services on our internet site and leave your email address in the process, it can be subsequently used by us for the dispatch of a newsletter. In such a case, exclusively direct promotion of our own similar goods or services will be sent using the newsletter.

There is no passing on of the data to third parties in relation to the data processing for the dispatch of newsletters. The data is exclusively used for the dispatch of the newsletter.

2. Legal basis for the data processing

The legal basis for processing the data after registration for the newsletter by the user is Article 6 section 1 lit. a GDPR in the presence of consent of the user.

§ 7 section 3 of UWG is the legal basis for the dispatch of the newsletter following the sale of goods or services.

3. Purpose of data processing

The collection of email address of the user helps in delivering the newsletter.

4. Duration of storage

The data is deleted as soon as it is no longer necessary for attaining the aim of its collection. The user's email address then saved as long as the subscription of the newsletter is active.

5. Option of objection and deletion

The newsletter can be unsubscribed at any time by the concerned user. There is a corresponding link for this purpose in each newsletter.

This link similarly facilitates the withdrawal of consent of storage of personal data collected at the time of the registration process.

VI. Registration

1. Description and scope of data processing

We offer the users an option to register on our website by giving personal details. Here, the data is entered in an input screen and transmitted to us and saved. The data is not passed on to third parties. Following data is collected in the course of the registration process:

At the time of registration, the following data is also stored:

- 1) The IP address of the user
- 2) Date and time of registration
- 3) Company
- 4) Title
- 5) First name
- 6) Last name
- 7) Street
- 8) Postcode
- 9) Place
- 10) Country
- 11) Email
- 12) Phone

As a part of the registration process, consent of the user is obtained for processing this data.

2. Legal basis for the data processing

The legal basis for processing the data is Article 6 section 1 lit. a GDPR in the presence of consent of the user.

If the registration helps in fulfilling a contract where the user is a contracting party or if it helps in the execution of pre-contractual actions, then the Article 6 section 1 lit. b of GDPR is the additional legal basis for processing the data.

3. Purpose of data processing

A registration of the user is necessary for fulfilling a contract with the user or to execute pre-contractual actions.

4. Duration of storage

The data is deleted as soon as it is no longer necessary for attaining the aim of its collection.

This is the case during the registration process to fulfil a contract or to execute pre-contractual actions if the data is no longer required for executing the contract. Even after conclusion of a contract, there can be a necessity to save personal data of the contract partner to comply with contractual or legal obligations.

5. Option of objection and deletion

As users, you have the option cancel the registration at any time. You can have the data about you that is stored modified at any time.

If the data is required for fulfilling a contract or to execute pre-contractual actions, an early deletion of the data is possible only if contractual or legal obligations do not oppose a deletion.

VII. Email contact

1. Description and scope of data processing

You can contact us using the email addresses provided. In this case, the personal data of the user transmitted with the email is saved.

Your personal data is not passed on to third parties, unless we would have been legally obliged to do so or you have given your consent in advance.

2. Legal basis for the data processing

Legal basis for the processing of data that is communicated in the course of submission of an email is Article 6 section 1 lit. f of GDPR. If the email contact is targeted at the conclusion of a contract, then the Article 6 section 1 lit. b of GDPR is the additional legal basis for the processing.

3. Purpose of data processing

The processing of personal data upon contacting via email lies here in the necessary legitimate interest in the processing of data.

4. Duration of storage

The data is deleted as soon as it is no longer necessary for attaining the aim of its collection. This is the case for the personal data that was transmitted by email if the respective conversation with the user has ended. The conversation has ended if the circumstances indicate that the concerned matter is conclusively settled.

5. Option of objection and deletion

The user always has the option to revoke his consent for processing the personal data. If the user contacts us by email, then he can object to the storage of his personal data at any time. In such a case the conversation cannot be continued.

All personal data that was stored in the course of contacting is deleted in this case.

VIII. Rights of the concerned person

If your personal data is processed, you are the concerned party in terms of GDPR and you are entitled to the following rights towards the responsible party:

1. Right to information

You can demand a confirmation from the responsible party on whether personal data concerning you is processed by us.

If such a processing exists, you can request information from the responsible party about the following details:

- (1) the purpose for which the personal data is processed;
- (2) the categories of personal data that are processed;
- (3) the recipient or the categories of recipients to whom the personal data concerning you was disclosed or is still to be disclosed;
- (4) the planned duration of storage of the personal data concerning you or, if giving specific details on this is not feasible, criteria for laying down the storage duration;
- (5) the existence of a right to correction or deletion of personal data concerning you, a right to restriction of processing by the responsible party or a right to object against this processing;

- (6) the existence of a right of appeal to a supervisory authority;
- (7) all available information about the origin of the data if the personal data was not collected from the concerned person;
- (8) the existence of an automatic decision making including profiling as per Article 22 sections 1 and 4 of GDPR and – at least in these cases – meaningful information about the involved logic as well as consequence and the intended effects of such a processing for the concerned person.

You have the right to request information about whether the personal data concerning you is transferred in a third country or to an international organisation. In this context, you can request to be informed about the suitable guaranties as per Article 46 of GDPR in connection with the transfer.

2. Right to correction

You have a right to correction and/or integration towards the responsible party, if the processing of personal data that concerns you is incorrect or incomplete. The responsible party has to perform the correction promptly.

3. Right to restriction of processing

Under the following conditions, you can request the restriction of processing of personal data concerning you:

- (1) if you dispute the accuracy of the personal data concerning you for a duration, which enables the responsible party to review the accuracy of the personal data;
- (2) the processing is unlawful and you decline the deletion of the personal data and instead, request the restriction of use of personal data;
- (3) the responsible party no longer needs the personal data for the purposes of processing, but you need it for the assertion, exercise or defence of legal claims, or
- (4) if you have appealed against the processing as per Article 21 section 1 of GDPR and it is not yet certain whether the legitimate reasons of the responsible party outweigh your reasons.

If the processing of personal data concerning you was restricted, this data may – apart from its storage – be processed only with your consent or for assertion, exercise or defence of legal claims or for protection of rights of another natural or legal person or for reasons of important public interest of the union or a member state.

If the restriction of processing was limited following the above mentioned conditions, you will be informed by the responsible party before the restriction is lifted.

4. Right to deletion

a) Obligation to deletion

You can request the responsible party to promptly delete the personal data concerning you, and the responsible party is obliged to promptly delete this data, provided one of the following factors is true:

- (1) The personal data concerning you is no longer needed for the purposes for which it was collected or was processed in another way.
- (2) You revoke your consent on which the processing as per Article 6 section 1 lit. a or Article 9 section 2 lit. a of GDPR was based, and there is otherwise a lack of legal basis for the processing.
- (3) You appeal as per Article 21 section 1 of GDPR against the processing and there are no primary legitimate reasons for the processing, or you appeal as per Article 21 section 2 of GDPR against the processing.

- (4) The personal data concerning you was unlawfully processed.
 - (5) The deletion of the personal data concerning you is necessary to fulfil a legal obligation according to the Union law or the law of the member states which governs the responsible party.
 - (6) The personal data concerning you was collected in relation to offered services of information society as per Article 8 section 1 of GDPR.
- b) Information to third parties

If the responsible party has made personal data concerning you public, and he is obliged to its deletion as per Article 17 section 1 of GDPR, then he takes appropriate actions, of technical nature also, considering the available technologies and the implementation costs, to inform those responsible for data processing, who process the personal data that you, as the concerned person, have requested them for the deletion of all links to this personal data or of copies or replications of this personal data.

- c) Exceptions

The right to deletion does not exist provided the processing is required

- (1) to exercise the right to free expression of opinion and information;
- (2) to fulfil a legal obligation that requires the processing under the law of the union or the member states, which governs the responsible party, or to perform a task that is in public interest or occurs in exercising public authority that was delegated to the responsible party;
- (3) for reasons of public interest in the field of public health as per Article 9 section 2 lit. h and i as well as Article 9 section 3 of GDPR;
- (4) for purposes of archiving, scientific or historical research or statistics that are in public interest as per Article 89 section 1 of GDPR, provided the law mentioned under section a) presumably makes the attainment of the objectives of the processing impossible or seriously affects it, or
- (5) for assertion, exercise or defence of legal claims.

5. Right to consultation

If you have asserted the right to correction, deletion or restriction of processing towards the responsible party, it is obliged, to communicate this correction or deletion of the data or restriction of processing to all recipients to whom the personal data concerning you was disclosed, unless this turns out to be impossible or is associated with a disproportionate effort.

You are entitled to the right towards the responsible party to be informed about these recipients.

6. Right to data portability

You have the right to obtain the personal data concerning you, which you have provided to the responsible party in a structured, current and machine-readable format. Apart from that, you have the right to transfer this data to another responsible party without interference from the responsible party to whom the personal data was provided, provided

- (1) the processing relies on consent as per Article 6 section 1 lit. a of GDPR or Article 9 section 2 lit. a of GDPR or on a contract as per Article 6 section 1 lit. b of GDPR and
- (2) the processing takes place by means of automatic procedures.

While exercising this right, you further have the right to the effect that the personal data concerning you is directly transferred from one responsible party to another responsible party, provided it is technically feasible. Liberties and rights of other persons must not be affected by it.

The right to data portability does not apply for a processing of personal data that is necessary for the performance of a task that is in public interest or occurs in exercising public authority that was delegated to the responsible party.

7. Right to objection

You have the right, for factors that arise from their special situation, to appeal at any time against the processing of the personal data concerning you, which happens based on the Article 6 section 1 lit. e or f of GDPR; this also applies for profiling based on these provisions.

The responsible party no longer processes the personal data concerning you, unless it can prove compelling and legitimate reasons that outweigh your interests, rights and liberties, or the processing helps in the assertion, exercise or defence of legal claims.

If the personal data concerning you is processed to run a direct advertising, you have the right to appeal at any time against the processing of the personal data concerning you for the purposes of such promotion; this also applies for the profiling, provided it is in connection with such direct advertising.

If you object the processing for the purposes of direct advertising, then the personal data concerning you will no longer be processed for these purposes.

You have the option, to exercise your right to objection in the context of the use of services of the information society – irrespective of the 2002/58/EC guideline – by means of automatic procedures, where technical specifications are used.

8. Right to revocation of declaration of consent under the data privacy law

You have the right to withdraw your declaration of consent under data privacy law at any time. The revocation of the consent does not affect the legality of the processing that has happened based on the consent until the revocation.

9. Automated decision in individual cases including profiling

You have the right to not be subjected to a decision exclusively based on an automated processing – including profiling, that takes legal effect with respect to you or considerably affects you in a similar manner. This does not apply when the decision

- (1) is necessary for the conclusion or fulfilment of a contract between you and the responsible party,
- (2) is permissible by virtue of the legislations of the union or member states, which govern the responsible party and these legislations include appropriate measures for the protection of your rights and liberties and your legitimate interests or
- (3) happens with your express consent.

However, these decisions may not be based on special categories of personal data under Article 9 section 1 of GDPR, provided Article 9 section 2 lit. a or g of GDPR does not apply and appropriate measures for the protection of rights and liberties as well as your legitimate interests are taken.

With respect to the cases stated in (1) and (3), the responsible party takes appropriate measures to protect the rights and liberties and your legitimate interests, to which, at least the right to obtain the intervention of a person from the responsible party, to state one's own stand point and to contest a decision pertains.

10. Right to complain to a supervisory authority

Regardless of an administrative or judicial remedy otherwise, you are entitled to the right of complaining to a supervisory authority, especially in the member state of your residence, your workplace or the location of presumed infringement, if you are of the view that the processing of personal data concerning you infringes the GDPR.

The supervisory authority with which the complaint was filed, informs the plaintiff about the status and the results of the complaint including the possibility of a judicial remedy according to Article 78 of GDPR.