

# **Mandatory privacy information**

### Introduction

We, Teckentrup GmbH & Co. KG, Industriestr. 50, 33415 Verl-Sürenheide, +49 (0) 5246-504 0, info@teckentrup.biz, as the data controller would like to explain to you below what data we process from you and how.

## **Privacy Officer**

If you have any questions regarding privacy, please do not hesitate to contact our <u>Privacy Officer</u>, Mr. Thomas Werning.

He can be reached at:

werning.com GmbH - Dieselstraße 12 - 32791 Lage, Germany - <u>datenschutz@teckentrup.biz</u> - +49 5232 980-4700

With this mandatory privacy information, we, as the data controller, comply with our duty to inform pursuant to Art. 12-14 of the GDPR.

### Information on data collection and processing

Below you will find information on what personal data (this is any data that identifies or makes identifiable you as a natural person (hereinafter "Data subject")) may be collected.

These are for example:

- Customer master data for the performance of the contract/fulfilment of the service, name, address, e-mail address, data in connection with payment processing, correspondence (e.g. written correspondence or e-mail exchange with you), advertising and sales data (e.g. to inform you about new potentially interesting offers by post or, with corresponding consent, also by e-mail)
- Data from contact initiations such as name, telephone number, e-mail address
- Supplier data such as name, telephone number, e-mail address
- Employee data such as name, address, bank data, religious affiliation,
  Personnel number, national insurance number, log data arising from the use of the IT systems, as well as other and special categories of personal data
- Applicant data such as name, address, e-mail address, marital status, religious affiliation
- Data from video surveillance



### Data subject rights

In accordance with Art. 15 of the GDPR, you have the right to obtain information about the data stored about you, including any recipients and the planned storage period. If inaccurate personal data is processed, you have the right to rectification in accordance with Art. 16 GDPR. If the legal requirements are met, you can request the deletion or restriction of processing and object to processing (Art. 17, 18 and 21 GDPR).

If you wish your data to be deleted but we are still legally obliged to retain it, access to your data will be restricted (blocked). The same applies in the event of a contradiction. You can exercise your right to data portability insofar as the technical possibilities are available to the recipient and to us.

Our data protection officer is available as a contact person for your data protection rights at <a href="mailto:datenschutz@teckentrup.biz">datenschutz@teckentrup.biz</a>.

## Right to appeal

If you are of the opinion that the processing of personal data concerning you violates the General Data Protection Regulation, you have the right to appeal with the data protection supervisory authority responsible for us

State Commissioner for the Land of North Rhine-Westphalia Kavalleriestr. 2-4, 40213 Düsseldorf, Germany Tel.: +49 (0) 211 38424 0, Fax: +49 (0) 211 38424 10

E-mail: poststelle@ldi-nrw.de

or any other supervisory authority.

### Purposes of the processing

## 1. Customer data/interested parties

### Purpose of the processing

We process data that we receive in the course of handling our business relationship with you. We receive the data directly from you. Either in the case of enquiries from interested parties and contacts, the placing of orders or order processing (see point "Information on data collection and processing").

### Legal basis:

The collection and processing of data is necessary for the performance of the contract and is based on Art. 6 para. 1 lit. 1 b) GDPR. The use for direct advertising is based on Art. 6 para. 1 p. 1 f) GDPR. It is our legitimate interest to draw your attention to special offers by means of direct advertising. The data is not passed on to third parties unless required by law, e.g. to the tax office within the framework of tax laws. The data is deleted as soon as it is no longer required for the purpose of its processing or after expiry of the statutory retention periods



(such as accounting records relevant under tax and commercial law): 10 years; commercial and business letters: 6 years; records of suppliers, type, quantity, purchase, delivery: 3 years).

You have the right to object to the use of your data for the purpose of direct marketing at any time. In addition, you are entitled to request information about the data we have stored about you and, if the data is incorrect, to request rectification or, in the case of unauthorised data storage, to request deletion of the data. You also have the right to appeal to a supervisory authority (see "Right to appeal").

### **Duration of data storage**

After performance of the contractually owed service, your personal data will be stored - for the purpose of the statutory warranty for 5 years - for the purpose of fulfilling the warranty conditions for 10 years - for the purpose of executing follow-up orders (requested at the time of conclusion of the contract or at a later time) for 25 years and - for tax purposes for 10 years.

#### **Deletion of data**

Your personal data will be deleted at the latest after expiry of the aforementioned periods.

## 2. Suppliers

### Purpose of the processing

We process data that we receive in the course of handling our business relationship with you. We receive the data directly from you when placing an order or processing an order (see item "Information on data collection and processing").

### Legal basis:

The collection and processing of data is necessary for the performance of the contract and is based on Art. 6 para. 1 lit. 1 b) GDPR. The data is not passed on to third parties unless required by law, e.g. to the tax office within the framework of tax laws. The data is deleted as soon as it is no longer required for the purpose of its processing or after expiry of the statutory retention periods (such as accounting records relevant under tax and commercial law): 10 years; commercial and business letters: 6 years; records of suppliers, type, quantity, purchase, delivery: 3 years).

You are entitled to request information about the data we have stored about you and, if the data is incorrect, to request rectification or, in the case of unauthorised data storage, to request deletion of the data. You also have the right to appeal to a supervisory authority (see "Right to appeal").



### 3. Employee data

See separate template to be handed out to employees.

## 4. Online applications/applicant management

### Purpose and legal basis of processing

In the context of your application, we process the data provided by you for the following purposes on the following bases:

- Assessment options for the selection and recruitment of new employees: § 26 para. 1 lit. 1 German Federal Data Protection Act (BDSG)
- Consideration for subsequent vacancies: Art. 6 para. 1 lit. a GDPR, § 26 para. 2 BDSG
- In the case of consent: Art. 6 para. 1 lit. a in conjunction with § 26 para. 2 BDSG, Art. 7 GDPR
- In the case of a legitimate interest such as protection against claims for injunctive relief or damages (e.g. under the German General Act on Equal Treatment (AGG)): Art. 6 para. 1 lit. f GDPR
- For the establishment, performance or termination of an employment relationship: § 26 para. 1 BDSG, Art. 6 para. 1 lit. b, c GDPR

### Access to your personal data

We only pass on your personal data within our company to those areas and persons who need it to fulfil contractual and legal obligations or to implement our legitimate interests. Otherwise, data will only be passed on to recipients outside the company if this is permitted or required by law, if the transfer is necessary to fulfil legal obligations or if we have your consent. In addition, we have commissioned external service providers (known as "Processors", see Art. 28 GDPR). On the one hand, for the organisation of incoming applications, on the other hand, for the implementation of application tests for certain applicant groups. These service providers are carefully screened and selected by us. We conclude an appropriate contract with each processor, which ensures that the personal data is only processed within the scope of our instructions and that the level of protection corresponds to ours.

### Storage of your data

Your data will only be stored until the contractual purpose has been fulfilled or the legal retention periods require it.

- Upon acceptance: Storage of your data within the framework of the employment relationship
- In the event of cancellation: Storage for up to 6 months

If you have given us consent for purposes that are not subject to a statutory retention period, we will store your data until you revoke your consent.

When using video conferencing systems as part of online application interviews, we use service providers as part of commissioned data processing. Please note the separate point "8". Online meetings, teleconferences, webinars and online application interviews

Your rights and how you can assert them can be found under "Data subject rights".



### 5. Server data collection

Please follow the link https://www.teckentrup.biz/en/privacy-policy to our privacy policy on our website.

### 6. Video surveillance

### Purpose of the processing

Our purpose of video surveillance is to prevent vandalism, to exercise domiciliary rights, to provide information after theft, to deter burglary and to protect our property. As the data controller, we process personal image files that we collect as part of the video surveillance on the company premises.

The storage period is 72 hours, after which the data is automatically deleted.

The **legal basis** is Art. 6 para. 1 lit. 1 f) GDPR. Our legitimate interest lies in preventing break-ins and protecting our property.

This data is only passed on to investigating authorities in the event of criminal offences.

Your rights and how you can assert them can be found under "Data subject rights".

## 7. Teckentrup Door Designer App

In our Teckentrup Door Designer app, you can upload a photo of your garage or take a new photo to combine it with our door designs in the view. Below we would like to inform you which personal data (this is all data that identifies or makes identifiable you as a natural person (hereinafter "Data subject"), such as name, address, email address or even user behaviour) we collect during the use of the Teckentrup Door Designer app and how it is used. If you still have questions, please feel free to contact us.

If you wish your data to be deleted but we are still legally obliged to retain it, access to your data will be restricted (blocked). The same applies in the event of a contradiction. You can exercise your right to data portability insofar as the technical possibilities are available to the recipient and to us.

### Purpose of the processing

Door Design Photo Combination App / Teckentrup CarTeck App

When using the photo capture function, take a photo of a garage door that you want to configure. We process this photo in the app so that we can insert and display the different garage door designs. In addition to using the camera function to take a new photo, you can also use an existing photo from your terminal's picture gallery. To do this, the app accesses the gallery of your end device with your consent and displays the available photos for selection. It is your own responsibility what other data, e.g. house number, vehicle registration number or a person standing in the garage area, you record for this purpose. We recommend using photos without such further information if possible. If you want to save a created configuration as a favourite, you have the option of giving the favourite a custom name. It is your responsibility which name you give. An image of the favourite is saved on your terminal. For this purpose, a new folder "Teckentrup" is created in the gallery of your end device.

The **legal basis** for the collection, processing and forwarding of the data is Art. 6 para. 1 lit. 1 b) GDPR in the context of contract processing.



### Data analysis through the use of the app and transfer of data to third parties

When the app is started, it checks whether there is a WLAN connection and assembles a connection to the online database to check whether there are any updates. For this purpose, only the date is transferred. There is no statistical evaluation of the accesses.

### Access rights required by the app

The app requires the following access rights, which it obtains when it is started for the first time

- Access to the file system to be able to save and load the configurations and favourites.
- Access the camera to take a photo or access the gallery to select an existing photo.

#### Storage period

Storage takes place purely in the app or on the user's end device and for as long as the user permits this or does not uninstall the app or delete data (screens).

Your rights and how you can assert them can be found under "Data subject rights".

## 8. Online meetings, teleconferences, webinars and online application interviews

We would like to inform you below about the processing of personal data in connection with the use of online communication platforms.

### Purpose of the processing

We use these digital platforms to conduct online meetings and/or webinars.

#### Data controller

The data controller for data processing directly related to the conduct of "Online meetings" is Teckentrup GmbH & Co. KG.

Notice: If you access the website of one of the providers used, the provider is responsible for data processing. However, calling up the website is generally only necessary to download the software for the use of the platforms. As a rule, you can also use the platform if you use the respective meeting ID and, if applicable, further access data for the meeting directly in the browser version.

### What data is processed?

Various types of data are processed when using the communication platforms. The scope of the data also depends on the data you provide before or during participation in an "online meeting". The following personal data is subject to processing:

- User details: First name, last name, telephone (optional), e-mail address, password (if "Single sign-on" is not used), profile picture (optional), department (optional)
- Meeting metadata: Subject, description (optional), participant IP addresses, device/hardware information,
- For recordings (optional): MP4 file of all video, audio and presentation recordings, M4A file of all audio recordings, text file of the online meeting chat.
- When dialling in by telephone: Incoming and outgoing call number, country name, start and end time. If necessary, further connection data such as the IP address of the device can be saved.

Text, audio and video data: You may have the opportunity to use the chat, question or survey functions in an "online meeting". In this respect, the text entries you make are processed in order to display them in the "online meeting" and, if necessary, to record them. To enable the display of video and the playback of audio, data from



your terminal's microphone and any terminal video camera will be processed accordingly for the duration of the meeting. You can switch off or mute the camera or microphone yourself at any time via the applications.

In order to participate in an "online meeting" or to enter the "meeting room", you must at least provide information about your name.

### Scope of the processing

If we want to record "online meetings", we will transparently inform you in advance and - where necessary - ask for consent. The fact of recording is also shown to you in the application. If it is necessary for the purposes of logging the results of an online meeting, we will log the chat content. However, this will usually not be the case. In the case of webinars, we may also process questions asked by webinar participants for the purposes of recording and following up webinars. If you are registered as a user, then reports on "online meetings" (meeting metadata, telephone dial-in data, questions and answers in webinars, survey function in webinars) can be stored for up to one year. Automated decision-making within the meaning of Art. 22 GDPR is not used.

### Legal basis for data processing

Insofar as personal data is processed by employees of Teckentrup GmbH & Co. KG are processed, § 26 BDSG is the legal basis for data processing. If, in connection with the use of online communication platforms, personal data is not required for the establishment, implementation or termination of the employment relationship, but is nevertheless an elementary component in the use of these, Art. 6 lit. 1 f) GDPR is the legal basis for the data processing. Our interest in these cases is in the effective conduct of "online meetings". Furthermore, the legal basis for data processing when conducting "online meetings" is Art. 6 para. 1 lit. b) GDPR, insofar as the meetings are conducted within the framework of contractual relationships. If there is no contractual relationship, the legal basis is Art. 6 para. 1 lit. f) GDPR. Again, our interest is in the effective conduct of "online meetings".

### Recipients / passing on of data

Personal data processed in connection with participation in "online meetings" will not be passed on to third parties as a matter of principle, unless they are specifically intended to be passed on. Please note that, as with face-to-face meetings, content from "online meetings" is often intended precisely to communicate information with customers, prospects or third parties and is therefore intended to be shared. Other recipients: The provider of the communication software necessarily obtains knowledge of the aforementioned data insofar as this is provided for in the context of our order processing agreement with him.

### Data processing outside the European Union

Current communication platform: "Microsoft Teams" is a service of Microsoft Ireland Operations Limited (One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland), a subsidiary of Microsoft Corporation (One Microsoft Way, Redmond, Washington 98052, USA). The geographical storage of the data was limited to Western Europe, but we cannot exclude the possibility of access from the USA and thus a third country. For more information on the cookies used by Microsoft, data protection and storage duration, please see the following link: <a href="https://privacy.microsoft.com/de-de/privacystatement">https://privacy.microsoft.com/de-de/privacystatement</a>.

## 9. Intention to process in third countries

In particular, if the intention is to process personal data in a third country, the existence or absence of an adequacy decision by the Commission must be explained. In the absence of such an adequacy decision, the website operator must describe, for example, which reasonable and appropriate safeguards (especially of a technical organisational nature) are provided for the data transfer. He must offer the possibility of obtaining a copy of the explanations of these guarantees. Further details can be found in Art. 13 para. 1 lit.1 f) GDPR. The described processing reference to a third country will be given in particular if the chosen service provider has its registered office in a third country, the service provider collects the data or stores the data collected via the



website on its own servers and can access it or uses servers of a third party and can access the usage data in the process.

## 10. Recipient categories

Within the scope of providing the service, we use service companies separately committed to secrecy and data protection for special areas where access to personal data cannot be excluded.

These categories of recipients are:

- Processors used by us (Art. 28 GDPR), in particular in the area of IT services, taxes, logistics and printing services, who process your data for us in accordance with instructions.
- Public bodies and institutions (tax authorities) in the event of a legal or official obligation.
- Other bodies for which you have given us your consent to transfer data.

Data will only be passed on to the authorities if overriding legal provisions apply.

## 11. Advertising and right to object

Name, first name and address are also collected for advertising purposes (sending offers, information about additional services). The processing for advertising purposes can be objected to at any time without giving reasons using the following contact details: <a href="marketing@teckentrup.biz">marketing@teckentrup.biz</a>

## 12. Objection to data storage

With the processing of data for the purpose of carrying out follow-up orders (desired at the time of the conclusion of the contract or at a later point in time) for 25 years, justified entrepreneurial interests are pursued from the point of view of data protection law. You can object to this processing at any time using the following contact details: <a href="mailto:datenschutz@teckentrup.biz">datenschutz@teckentrup.biz</a>

# 13. Obligation to make available

Without correct information from you, it is usually not possible to conclude a contract.

### Up-to-dateness and amendment of this mandatory information

We reserve the right to adjust the content of this mandatory information at any time. This is usually done in the event of further development or legal adaptation. You can access the current mandatory information via a link



(https://www.teckentrup.biz/en/privacy-policy/mandatory-privacy-information), which is inserted in e-mails, offers, order confirmations, invoices, etc.

Status of this policy: 15/08/2023

Further information on the handling of personal data can be found at https://www.teckentrup.biz/en/privacy-policy