

With this data protection information we inform you, our customers, in accordance with the EU data protection regulation (DS-GVO) valid from 25 May 2018 on the processing of your personal data by us as well as on the rights to which you are entitled.

This information will be updated as necessary and published at <http://www.keytechplm.com/meta-nav/privacy-notice.html>

There you will also find our privacy policy for visitors to our website.

1. Who is responsible for data processing and who can I contact?

We are responsible,

keytech Software GmbH
Suderwichstraße 68
45665 Recklinghausen
Germany
Telefon +49 2361 985 80 0
Email: info@keytech.de
Internet: www.keytech.de

Contact details of the data protection officer:

Mr. Olaf Tenti
Gesellschaft für Datenschutz und Informationssicherheit mbH
Fleyer Strasse 61
58097 Hagen
Germany
Email: datenschutz@gdi-mbh.eu
Internet: www.gdi-mbh.eu

2. What sources and data do we use?

We process data that we receive from the business relationship with you. We receive the data directly from you, e.g. when concluding a contract or placing an order, or data collected on our website.

We process the following data specifically:

- master data from the contract documents (e.g. name, address and contact details, bank details)
- data in connection with the execution of the contract (e.g. subject matter of the contract, delivery address, payment method)
- correspondence (e.g. correspondence with you)

- advertising and sales data (e.g. potentially interesting products for you).

3. What do we process your data for (purpose of processing) and on what legal basis?

In the following we will inform you for what purpose and on what legal basis we process your data.

3.1 The fulfilment of contractual obligations (Article 6(1)(b) DS-GVO)

We process your data for the execution of our contracts with you, i.e. in particular for the execution of your orders.

The purposes of data processing depend in detail on the specific product and the contractual documents.

3.2 In the context of balancing interests (Article 6(1)(f) DS-GVO)

We may also use your data on the basis of a balance of interests to protect the legitimate interests of us or of third parties. This is done for the following purposes:

- supporting our employees in customer advice and support and sales
- general business management and further development of services and products
- advertising, market and opinion research
- assertion of legal claims and defence in legal disputes
- prevention and clarification of criminal offences
- guarantee of IT security and IT operation

Our interest in the respective processing arises from the respective purposes and is otherwise of an economic nature (efficient performance of tasks, sales, avoidance of legal risks). As far as the specific purpose permits, we process your data pseudonymised or anonymised.

3.3 On the basis of your consent (Article 6(1)(a) DS-GVO)

If you have given us your consent to the processing of personal data, the respective consent is the legal basis for the processing stated there. This applies in particular to your possible consent when concluding a contract for the first time to pass on your data to our employees for customer advice and support. In addition, you may have agreed to be contacted for advertising purposes by e-mail or telephone.

You can revoke your consent at any time with effect for the future. This also applies to declarations of consent that you gave us prior to the validity of the DS GVO, i.e. before 25 May 2018. The revocation is only effective for future processing.

3.4 Due to legal requirements (Art. 6 para. 1 letter c DS-GVO)

We are subject to various legal obligations, i.e. legal requirements (e.g. German Commercial Code, tax laws).

4. Who gets my data?

Your data will only be passed on if a legal basis permits this. Within our company, those departments receive your data which are required to fulfil our contractual and legal obligations or to fulfil their respective tasks (e.g. sales and marketing).

In addition, the following offices may receive your data:

- contract processors used by us (Art. 28 DS-GVO), especially in the area of IT services and logistics, who process your data on our behalf in accordance with our instructions
- public bodies and institutions (e.g. tax authorities) in the event of a legal or official obligation and
- other bodies for which you have given us your consent to the transfer of data (in particular companies affiliated with us)

5. How long will my data be stored?

If necessary, we process your personal data for the duration of our business relationship, which also includes the initiation and processing of a contract. In addition, we are subject to various storage and documentation obligations, which result, among other things, from the German Commercial Code (HGB) and the Tax Code (AO). The periods for storage and documentation specified there range from two to ten years.

Finally, the storage period is also assessed according to the statutory limitation periods, which, for example, according to §§ 195 et seq. of the German Civil Code (BGB) can generally amount to three years, but in certain cases also up to thirty years.

6. Is data transferred to a third country or to an international organisation?

We will only transfer your data to countries outside the European Economic Area - EEA (third countries) if this is necessary or legally required for the execution of your orders or if you have given us your consent.

7. What other privacy rights do I have?

You have the right to information under the respective legal conditions (Art. 15 DS-GVO, § 34 Bundesdatenschutzgesetz (BDSG) in its version valid from 25 May 2018). On correction (Art. 16 DS-GVO), on deletion (Art. 17 DS-GVO, § 35 BDSG), on restriction of processing (Art. 18 DS-GVO) and on data transferability (Art. 20 DS-GVO). You also have a right of appeal to a data protection supervisory authority (Art. 77 DS-GVO, § 19 BDSG).

8. Is there an obligation for me to provide data?

In the context of our business relationship you only have to provide those personal data which are necessary for the establishment, execution and termination of a business relationship or which we are legally obliged to collect. Without these data we will usually have to refuse the conclusion of the contract or the execution of the order or we will no longer be able to execute an existing contract and may have to terminate it.

9. To what extent is there automated decision making in individual cases?

For the establishment and implementation of the business relationship we do not use automated decision making according to Art. 22 DS-GVO. Should we use these procedures in individual cases, we will inform you separately, insofar as this is required by law.

10. To what extent is my data used to create a profile?

We process your data partially automatically with the aim of evaluating certain personal aspects (so-called "profiling") in accordance with Art. 4 No. 4 DS-GVO. For example, we use profiling in the following cases: We may evaluate your information to determine your potential interest in our products and services. This evaluation is based on statistical procedures using current customer data and data from the past. We use the results to address you in a more demand- and target-oriented way.

11. What rights of objection do I have? (Art. 21 DS-GVO)

a) Right of objection in individual cases

You have the right to object at any time, for reasons arising from your particular situation, to the processing of personal data concerning you under Article 6(1)(f) DS-GVO (data processing on the basis of a balance of interests). This also applies to profiling based on this provision within the meaning of Art. 4 No. 4 DS-GVO, which may be carried out, for example, for customer advice and support and for marketing purposes. If you object, we will no longer process your personal data, unless we can prove compelling reasons worthy of protection for the processing, which outweigh your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

b) Right of opposition to the processing of data for direct marketing purposes

We can also process your data for direct advertising within the framework of legal regulations. You have the right to object at any time to the processing of personal data concerning you for the purpose of such advertising. This also applies to profiling insofar as it is connected with such direct advertising. If you object to the processing for direct advertising purposes, we will no longer process your personal data for these purposes. The objection can be made form-free in each case. You will find our contact details under number 1.