

## Privacy Policy

We take the issue of data protection very seriously and would like to provide you with some information in the following privacy policy regarding the nature, scope and purpose of our processing of personal data.

### CONTROLLER

Controller **Energy Glas GmbH**  
Zur Frado 1  
D-34466 Wolfhagen  
Phone: +49 (0) 5692/99745-0  
Fax: +49 (0) 5692/99745-99  
Email: info@energy-glas.de

The controller with overall responsibility for data processing in the Schollglas Group – except for Schollglas Polska Sp.z.o.o is

**Schollglas Holding- und Geschäftsführungsgesellschaft mbH**  
Schollstrasse 4  
D-30890 Barsinghausen  
Phone: +49 (0) 5105/777-0  
Fax: +49 (0) 5105/777-118  
Email: info@schollglas.com

#### Contact data for the data protection officer appointed jointly for the Schollglas Group

Email: [datenschutz@schollglas.com](mailto:datenschutz@schollglas.com)  
Postal address: Schollglas Dienstleistungs- und Entwicklungsgesellschaft  
Data Protection  
Schollstrasse 4  
D-30890 Barsinghausen

### PERSONAL DATA

As defined in Art. 4 no. 1 GDPR, personal data are any and all information relating to an identified or identifiable natural person (“data subject”). An identifiable natural person is one who 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 to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Personal data are therefore any and all data that personally relate to you such as name, address, email address or phone number.

### COLLECTION AND STORAGE OF PERSONAL DATA AND THE NATURE AND PURPOSE OF THEIR USE

Insofar as you provide us with personal data, whether orally, in writing, by using our contact form or by email, they are processed in compliance with the requirements of the General Data Protection Regulation (GDPR) and national data protection regulations. Without the processing of personal data such as

- personal identifying information (first name and surname, position, function, date of birth, address),
- your professional or personal contact data/the contact data of your employer (phone numbers (landline/mobile), email address, fax number),
- order and contract data,
- or other information that we have received from you,

it is not possible for us to process your request, to perform a contract that has been concluded with you or to comply with legal obligations.

We also process data that we have legally obtained from third parties insofar, and to the extent that, this processing is necessary for one of the purposes stated below. Third parties in this sense may be (among others) other companies, publicly accessible sources such as the Commercial Register or other registers, records of debtors, the internet, registry offices or credit agencies.

The purposes for the processing of your personal data include:

- The establishment and performance of contracts with you or with your employer and the taking of initial steps for the conclusion of a contract (point (b) of Art. 6 (1) GDPR);
- Compliance with legal obligations, e.g. relating to taxes (point (c) of Art. 6 (1) GDPR).

Point (f) of Art. 6 (1) GDPR can also be the legal basis for processing. For instance, in the pursuit of our legitimate interests, we process your personal data for the establishment of claims, for insurance policies (especially commercial credit insurance) or for the conduct of a credit check.<sup>1</sup>

We do not use at all any fully automated decision-making processes in the sense of Art. 22 GDPR nor do we carry out profiling.

#### TRANSFER OF DATA

Your personal data are not transferred to third parties for any purposes other than those specified below or in a scope greater than that required for the purposes. We transfer your personal data to third parties solely if and when:

- You have given your express consent to the transfer in accordance with point (a) of Art. 6 (1) GDPR;
- It is necessary in accordance with point (b) of Art. 6 (1) GDPR for the performance of contracts with you;
- It is related to a legal obligation to transfer the data in accordance with point (c) of Art. 6 (1) GDPR; or
- The transfer is necessary pursuant to point (f) of Art. 6 (1) GDPR and there is no reason to assume that you have an overriding legitimate interest in the non-transfer of your data.

Third parties may be in particular:

- **Affiliated companies:** It may be necessary to transfer your personal data to affiliated companies within our group so that your queries and contractual matters can be processed. This is the case, for example, if your query concerns a company within our group that is different from the one to which you originally sent your query. The data are transferred on the basis of point (f) of Art. 6 (1) GDPR and solely insofar as the transfer is required for business reasons.

Affiliated companies:

Schollglas Holding- und Geschäftsführungsgesellschaft mbH	Schollstraße 4 D – 30890 Barsinghausen	www.schollglas.com
Schollglas GmbH	Schollstraße 4 D – 30890 Barsinghausen	www.schollglas.com
Schollglas Dienstleistungs- und Entwicklungsgesellschaft mbH	Schollstraße 4 D – 30890 Barsinghausen	www.schollglas.com
Schollglas Sachsen GmbH	Vorwerkstraße 3 D – 01683 Nossen	www.schollglas.com
Schollglas Technik GmbH Nossen	Vorwerkstraße 3 D – 01683 Nossen	www.schollglas.com

<sup>1</sup>Please note the »Supplementary Provisions to the Privacy Policy — Credit Checks« regarding the processing of data by credit agencies.

Schollglas Technik GmbH Lommatzsch	Glashüttenstraße 5 D – 01623 Lommatzsch	www.schollglas.com
Schollglas Technik GmbH Isernhagen	Krendelstraße 34 D – 30916 Isernhagen	www.schollglas.com
Schollglas Technik GmbH Herford	Füllenbruchstraße 185 D – 32051 Herford	www.schollglas.com
Schollglas Technik GmbH Lübben	Mühlbergweg 1 D – 15907 Lübben	www.schollglas.com
Schollglas Technik GmbH Ravensburg	Robert-Bosch-Straße 3 D – 88214 Ravensburg	www.schollglas.com
Schollglas Nederland BV	Nieuwstraat 152 NL – 6431 Hoensbroek	www.schollglas.com
Schollglas Polska Sp.z.o.o	ul. Zakładowa 39 PL – 39-400 Tarnobrzeg	www.schollglas.com
Euraspiegel Handelsgesellschaft mbH	Donaustraße 36 D – 90451 Nürnberg	www.euraspiegel.com
Glasfischer Glastechnik GmbH	Krendelstraße 34 D – 30916 Isernhagen	www.glasfischer.com
Glasfischer Glastechnik GmbH	Industriestraße 18 D – 15366 Hoppegarten	www.glasfischer.com

These companies are also obligated to treat your personal data with the same care that we use in their processing.

- Processors: It is possible that external service providers we have engaged for data processing will come into contact with your personal data. This is especially the case when we are unable to perform processing activities ourselves such as the maintenance of our software. In compliance with Art. 28 GDPR, we have contractually obligated any service providers acting on behalf of our group to process data in accordance with our instructions and in compliance with applicable law.
- Transfer to third countries: The servers used in our group are located within the European Union. It is possible, however, that personal data must be transferred to third countries (i.e. countries that are not member states of the European Union or the European Economic Area) for performance of services or compliance with our legal obligations. Before we transfer any personal data to a third country, we of course determine whether the conditions for such a transfer in accordance with the GDPR have been met (e.g. whether the European Commission has implemented adequacy decisions) or secure the conditions for the lawful transfer through the use of standard contractual clauses for data protection.

#### STORAGE OF YOUR PERSONAL DATA

We process and store personal data solely for the period necessary for fulfilment of the purpose of the storage (e.g. orderly processing of the business transaction) or as required by statutory storage/retention periods. If and when the purpose of the storage ceases to exist or if a statutory storage/retention period expires, we will erase the personal data.

#### YOUR RIGHTS AS DATA SUBJECT

Pursuant to Art. 15 GDPR, you have the right to obtain **information** about our processing of your personal data. In particular, you may request information about the purposes of the processing, the category of the personal data, the categories of recipients to whom your data have been or are disclosed, the planned storage period, the existence of your right to rectification, erasure, restriction of the processing or objection, the existence of a right to lodge a complaint, the origin of the data insofar as we did not collect them as well as the existence of any automated decision-making, including profiling, and meaningful information about the logic involved in these cases.

Pursuant to Art. 16 GDPR, you have the right to request **rectification** without undue delay of inaccurate data or completion of your personal data we have stored.

Pursuant to Art. 17 GDPR, you may also request the **erasure** of your personal data we have stored unless the processing is necessary for exercising the right of freedom of expression and information, for performance of a legal obligation, for reasons of public interest or for the establishment, exercise or defence of legal claims.

Pursuant to Art. 18 GDPR, you have the right to request the **restriction of the processing** of your personal data. This applies insofar as you have contested the accuracy of the data; the processing is unlawful, but you oppose their erasure and we no longer need the data, but you need them for the establishment, exercise or defence of legal claims; or you have objected to the processing pursuant to Art. 21 GDPR.

Pursuant to Art. 20 GDPR, you may request the provision of the personal data you have made available to us in a structured, commonly used and machine-readable format or the transfer of these data to another controller.

Pursuant to Art. 7 (3) GDPR, you have the right to **withdraw** any consent you have given to us at any time. The consequence of this action is that we may not continue any data processing based on this consent in the future.

Pursuant to Art. 77 GDPR, you have the opportunity to **lodge a complaint** with a supervisory authority. As a rule, you can contact the supervisory authority at your habitual residence or place of work or the location of our firm for this purpose.

**If you wish to exercise any of your rights described above, please contact our data protection officer; the contact data have been made available at the beginning of this privacy statement.**

#### RIGHT TO OBJECT

If and when your personal data are processed for the purposes of legitimate interests pursuant to point (f) of Art. 6 (1) GDPR, you have the right, pursuant to Art. 21 GDPR, to object to the processing of your personal data on grounds relating to your particular situation.

If we process your personal data for direct marketing purposes, you may object to such processing at any time. This is a general right to object with which we will comply without requiring any information relating to a particular situation.

**If you wish to exercise your right to object, please contact our data protection officer; the contact data have been made available at the beginning of this privacy statement.**

#### CURRENTNESS AND MODIFICATION OF THIS PRIVACY POLICY

This privacy policy is currently in effect. It may become necessary, however, to modify or amend this privacy policy as a consequence of changes in statutory or official requirements. The most recently revised privacy policy be accessed and printed out from our website at any time.