

Data protection information for customers and interested parties

In accordance with Art.13 and 14 of the General Data Protection Regulation (GDPR)

Data protection is important to us. The following information explains how we use your personal data and outlines your rights.

1. Entity responsible for data processing and contact person

Sprimag Spritzmaschinenbau GmbH & Co.KG
Henriettenstraße 90
73230 Kirchheim unter Teck
CEO: Joachim Baumann

Telefon +49 (0)7021 579-0
E-Mail: info@sprimag.de

2. Contact details of the Data Protection Officer (DPO)

Bernd Knecht
Rotdornweg 7
73230 Kirchheim /Teck

Telefon +49 (0)7021 487628
E-Mail: datenschutz@sprimag.de

3. Purpose and legal basis on which we process personal data

We process all personal data in accordance with the provisions of the General Data Protection Regulation (GDPR), the German Data Protection Act (BDSG) and other relevant data protection regulations. The processing and use of the individual data depends on the agreed or requested service. Our contract documents, forms, consent forms and other information provided to you (e.g. on our website) contain further details and more information on why we collect data in those specific instances.

Processing may also be carried out electronically. This is particularly the case if you communicate electronically, for example by e-mail or via a contact form on the website, and thus transmit information to us. You can also use our Cryptshare server for the secure transmission of application documents. We will inform you about the use of this transmission method on our website.

3.1 Consent (Art.6 para.1 (a) GDPR)

In case you have consented to the processing of personal data, this consent will form the legal basis on which this data will be processed in that specific instance. You have the right to withdraw this consent at any time with future effect.

3.2 Performance of contractual duties (Art.6 para.1 (b) GDPR)

We process your personal data for the performance of our contracts with you, i.e. in particular in the context of order entry, production, delivery and invoicing of our products. Furthermore, your personal data is processed for the implementation of measures and activities in the context of pre-contractual relationships, such as the preparation of offers.

3.3 Compliance with legal obligations (Art.6 para.1 (c) GDPR)

We process your personal data if this is necessary to fulfill legal obligations (e.g. commercial and tax laws and the EU Anti-Terrorism Regulation). We may also process your data to fulfill tax control and reporting obligations and to archive data for the purposes of data protection and data security as well as for audits by tax and other authorities. In addition, the disclosure of personal data may become necessary in the context of official/judicial measures for the purposes of gathering evidence, criminal prosecution or the enforcement of civil law claims.

3.4 Legitimate interests pursued by us or a third party (Art.6 para.1 (f) GDPR)

We may furthermore use your personal data where necessary based on a weighing of interests to pursue our or a third party's legitimate interest. We may do so for the following purposes:

- for advertising or market research, if you have not objected to the use of your data
- for obtaining information and exchanging data with credit agencies if the conclusion of the contract exceeds our economic risk
- for the limited storage of your data, if deletion is not possible or only possible with disproportionately high effort due to the special type of storage (e. g. in the mail archive or data backup).

- for enforcing legal claims and as evidence in legal disputes that are not directly related to our contractual relationship with you
- to use tools to conduct online negotiations and meetings if a face-to-face meeting is not possible due to geographical, scheduling or other circumstances
- for the collection and storage of visitor data in the context of your visit to our company, as well as for the announcement of visitors to Sprimag on the visitor panel
- for comparison with European and international anti-terror lists, if this goes beyond the legal obligations
- for the enrichment of our data through the use of publicly accessible data, including research in public profiles
- for benchmarking purposes
- for statistical evaluations or for market analyses
- for safeguarding and exercising our domiciliary rights through appropriate measures (e.g. video surveillance)
- for storing and archiving your contact data (electronic address books and business card archive) to make it easier to contact you
- for the use of CRM software to manage contacts of existing and potential customers. This is used to record, sort and analyze customer interactions across various channels, e.g. on our website and in communication by email, social media or telephone. The personal data collected in this way can be evaluated and used for communication or marketing measures (e.g. direct advertising or newsletter mailings)
- if applicable, for the transfer of your data to affiliated companies and commercial agents
- if necessary, for the transfer of your data to suppliers / subcontractors / cooperation partners in the context of project inquiries and specific orders
- if necessary, for the transfer of your data to general contractors involved in the contract negotiations

The processing of personal data of our customers' and interested parties' employees is generally carried out exclusively on the basis of our legitimate interest.

4. Categories of personal data we process

We process the following data:

- personal details (such as e.g. name, education, position in the company, industry sector)
- contact details (such as e.g. address, email address, telephone number)
- all information that you provide to us in connection with a visit to our premises, e.g. in the context of visitor registration and video surveillance of our premises
- all information in connection with audio and video conferences and the use of online meeting software
- information in connection with visits to our website and our social media channels, including the publication of comments, ratings, etc.
- customer history
- general correspondence

We also process personal data from public sources (e.g. internet and media). If this is necessary for the provision of our services, we also process personal data that we have lawfully obtained from third parties (e.g. address publishers, credit agencies, branches and commercial agents).

5. Who will get to see your data?

Within our company, we only provide your personal data to those employees and divisions that need this data in order to fulfil our contractual and legal obligations or to pursue our legitimate interests.

In addition, the following offices may receive your data:

- contract processors used by us (Art.28 GDPR), service providers for supporting activities and other persons responsible within the meaning of the GDPR, in particular in the areas of IT services, logistics, courier services and mail, printing services, external data centers, support/maintenance of IT applications, archiving, data destruction, purchasing/procurement, letter shops, marketing, telephony, website management, tax consultancy, auditing services, financial institutions
- public bodies and institutions where there is a legal or official obligation under which we are obliged to provide information, report or pass on data or where the passing on of data is in the public interest
- bodies and institutions on the basis of our legitimate interest or the legitimate interest of the third party (e. g. authorities, credit agencies, lawyers, courts, experts and supervisory bodies)
- affiliated companies
- commercial agents, if an agency agreement exists for the sales territory in question
- general contractors involved in the contract negotiations

- other places for which you have given us your consent for the data transfer

6. Transfer of personal data to a third country or international organization

We use in-house software for collaboration and electronic communication (online meetings, chat, etc.) from Microsoft Corporation, Redmond, USA. Although it has been agreed with Microsoft that the data will be hosted on German or European servers (Data Boundary Online Services), there is a theoretical possibility that, due to legal requirements in the USA, where the company's headquarters are located, third parties could gain access to personal data of the data subjects (CLOUD Act, Patriot Act, etc.). Such data transfer is based on the EU Standard Contractual Clauses 2021 (SCC), which contain further guarantees to comply with the level of data protection in accordance with Art.46 GDPR. In addition, Microsoft is certified in accordance with the EU-US Data Privacy Framework (DPF) and thus guarantees a level of protection comparable to that prescribed by the European General Data Protection Regulation.

Furthermore, no data processing takes place outside the EU or the EEA.

7. How long we'll keep your information?

Where necessary, we process your personal data for the duration of our business relationship, which also includes the initiation and execution of a contract.

In addition, we are subject to various retention and documentation obligations arising from the German Commercial Code (HGB) and the German Fiscal Code (AO), among others. The retention and documentation periods specified there are up to 11 years beyond the end of the business relationship or the pre-contractual legal relationship.

Ultimately, the storage period is also determined by the statutory limitation periods, which, for example, according to Sections 195 et seq. of the German Civil Code (BGB), are generally three years, but in certain cases can be up to thirty years.

8. To what extent do we use automated individual decision-making (including profiling)?

We do not use a purely automated decision-making process in accordance with Art.22 GDPR. Should we intend to use such a procedure at a later date, we will inform you of this separately.

9. Your data protection rights

You have the right of access under Art.15 GDPR, the right to rectification under Art.16 GDPR, the right to erasure under Art.17 GDPR, the right to restriction of processing under Art.18 GDPR and the right to data portability in accordance with Art.20 GDPR. **In principle, according to Art.21 GDPR, there is a right to object to the processing of personal data by us if the processing is based on a legitimate interest (Art.6 para.1 (f) GDPR). However, this right to object only applies if there are very special circumstances relating to your personal situation, whereby rights of our company may conflict with your right to object. You can also object to the processing of your personal data for the purpose of direct marketing at any time.**

If you wish to assert one of these rights, please contact the controller or our data protection officer. You will find the contact information under section 1. and 2. in this data protection information.

10. Your Right to lodge a complaint with the responsible supervisory authority

If you consider the processing of your personal data unlawful, you can lodge a complaint with a supervisory authority that is responsible for your place of residence or work or for the place of the suspected infringement (Art.77 GDPR).

The supervisory authority responsible for us is:

The State Commissioner for Data Protection and Freedom of Information
Lautenschlagerstraße 20
70173 Stuttgart, Germany

Phone: +49 (0) 711 / 615541-0

Email: poststelle@lfdi.bwl.de

Web: <https://www.baden-wuerttemberg.datenschutz.de>

11. Scope of the data you are required to provide

You only need to provide the data that is necessary for the establishment and execution of a business relationship or for a pre-contractual relationship with us or which we are legally obliged to collect. Without this information, we will usually not be able to conclude or execute the contract. This may also refer to data required later within the framework of the business relationship. Should we ever request any data in excess of this essential data, we will specifically make you aware of the fact that provision of such data is voluntary.

12. Status and Updating of this privacy policy

This information is current as of 20th May 2025. We reserve the right to update the privacy policy in due course in order to improve data protection and/or to adapt it to changes in official practice or case law.