

## Data protection information for customers, suppliers and business partners

As of: Oktober 2025

With the following data protection information, we inform you about the type and scope of the processing of your personal data, purposes and legal bases, disclosure to third parties and deletion periods, as well as your rights as a data subject under the GDPR (Data Protection Basic Regulation) and the Federal Data Protection Act (BDSG).

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

a) Responsible party according to art. 4 no. 7 EU Data Protection Basic Regulation (GDPR) is the

**GMT Gummi-Metall-Technik GmbH**

Liechtersmatten 5, D - 77815 Bühl

Tel. +49 (0)7223 804-0

Fax. +49 (0)7223 210-75

E-mail-address: [info@gmt-gmbh.de](mailto:info@gmt-gmbh.de)

hereinafter referred to as "we" or "us".

### b) Data Protection Officer

You can reach our data protection officer by e-mail: [datenschutzbeauftragter@gmt-gmbh.de](mailto:datenschutzbeauftragter@gmt-gmbh.de) or by post at the above address with the addition "Attn. data protection officer".

### 2. What categories of data do we process and what are the sources of the personal data?

a) The categories of personal data processed

include:

- master data (title, first and last name, company, address, function, department)
- contact information (phone number, mobile number, fax number and e-mail address)
- type of identification for proof of identity (e.g. ID card), visit recipient, reason for visit, start and end of visit, and for vehicle drivers moving around the site, the vehicle license plate number and cell phone number are additionally
- data necessary for processing an inquiry, if necessary also credit rating data
- CRM data, especially customer history, customer statistics
- support requests,
- other information that is required to process our contractual relationship or a project with our customers or sales partners (such as payment data, order data, etc.)

b) We process personal data which we have obtained from business relationships (e.g. with customers or suppliers) or inquiries. As a rule, we receive this data directly from the contractual partner or a person making an inquiry. However, personal data may also originate from public sources (e.g. commercial register), provided that the processing of this data is permitted. We may also be authorized to receive data from other companies, including affiliated companies. Depending on the individual case, we also store our own information on this data (e.g. as part of an ongoing business relationship).

### 3. For what purposes and on what legal basis do we process personal data?

We process personal data in accordance with the provisions of the GDPR and national data protection regulations:

#### a) Within the framework of the fulfillment or execution of a contract or for the implementation of pre-contractual measures (art. 6 para. 1 lit. b) GDPR)

We process personal data primarily for the fulfillment of contractual obligations and the provision of related services or in the context of a corresponding contract initiation (e.g. contract negotiations, preparation of offers). The specific purposes depend on the respective service or product to which the business relationship or the contract initiation relates, in particular in connection with orders from customers and orders from suppliers and service partners. Furthermore, we process your data in the processing of the services provided, in particular invoicing, debtor management, dunning and collection.

The data processing serves the following purposes in particular:

- Communicate with our contacts about products, services, promotions and activities
- Support, in particular answering inquiries from our contact person, prospective customers, customers or distributors
- Planning, execution and administration of the business relationship between us and our customers, distributors or our contacts, e.g. to process the order, for accounting purposes; to carry out and process deliveries.

#### **b) For the protection of legitimate interests (art. 6 para. 1 lit. f) GDPR)**

To the extent necessary, we process your data beyond the actual performance of the contract to protect legitimate interests of us or third parties, namely:

- access control and plant security, in particular identification and authorization, issuance of visitor badges/ entry permits, communication, monitoring and security checks
- testing and optimization of procedures for demand analysis and direct customer contact; incl. customer segmentation and calculation of closing probabilities
- settlement of legal disputes, enforcement of existing contracts and assertion, exercise and defense of legal claims
- maintaining and protecting the security of our systems and the company's IT operations
- measures for building and plant security (e.g. access control or video surveillance)
- exchange of control and planning data with related GMT companies
- credit rating

#### **c) Due to legal obligations (art. 6 para. 1 lit c) GDPR)**

We are subject to various legal obligations, i.e. legal requirements (e.g. anti-terror list comparison, money laundering law). The purposes of the processing include, among others, the fulfillment of tax and social law control and reporting obligations.

This also includes legal reporting obligations for the provision of services and the posting in accordance with A1 procedures, see also item 5. Likewise, the processing of personal data insofar as this is necessary for the implementation of technical and organizational measures in accordance with Art. 32 GDPR.

#### **d) Based on your consent (art. 6 para. 1 lit. a) GDPR)**

Insofar as you have given us consent in individual cases to process personal data for specific purposes (e.g. film and photo recordings, newsletter subscription), the legality of this processing is given on the basis of your consent. You can revoke your consent at any time with effect for the future.

#### **4. Who will get my data?**

Within GMT, your personal data is accessed by those persons who need it to fulfill our contractual and legal obligations or to protect legitimate interests.

We may disclose personal data to courts, government agencies, regulatory authorities or law firms insofar as this is legally permissible and necessary to

comply with applicable law or to assert, exercise or defend legal claims.

Furthermore, service providers and vicarious agents employed by us may receive data for these purposes. We may only disclose information about you if this is required by law, you have consented, we are legally authorized to provide information or to disclose information and/or our contracted service providers warrant compliance with confidentiality and data protection regulations, in particular the German Data Protection Act (GDPR) and the German Federal Data Protection Act (BDSG).

Under these conditions, the following recipients may receive data in the process:

- Related GMT Companies,
  - insofar as they act as processors for us,
  - in the context of data transmission and exchange of electronic messages and the use of Microsoft 365.
  - for the exchange of management and planning data (financial and controlling data) between the related companies, insofar as this is necessary to protect our legitimate interests.
- processors, especially cloud services and web analytics services
- IT service provider within the scope of (remote) maintenance of IT systems
- subcontractors for order fulfillment, especially transport and logistics
- customers within the framework of business correspondence and order documentation
- auditors
- credit rating service provider
- public authorities for the fulfillment of legal reporting obligations, e.g. financial authorities, responsible office in A1 proceedings
- data destruction service provider
- lawyers, tax consultants and auditors
- debt collection service provider
- banks, payment card processors (credit cards) and payment service providers
- telephony provider
- insurances

#### **5. Will your data be transferred to a third country?**

A data transfer to countries outside the EU or the EEA (so-called third countries) takes place only if this is necessary for the execution of your orders (e.g. material procurement, manufacturing, delivery,

logistics) or is required by law (e.g. tax reporting obligations), you have given us consent or within the framework of an order processing. Furthermore, we transmit data to related companies for the protection of legitimate interests. In case of transfer of personal data to third countries, we ensure an adequate level of data protection in compliance with the principles according to art. 44 ff. GDPR. This means that the processing is carried out, for example, on the basis of special warranties, such as the officially recognized determination of a data protection authority corresponding to the EU (e.g. for Switzerland) or compliance with recognized special contractual obligations (so-called "EU standard contractual clauses").

In the case of the provision of services and the secondment of employees (A1 procedure), it is possible that, in accordance with the statutory reporting requirements, we transmit personal data to our customers and/or clients or the place of work to the competent authorities.

## **6. How long will my data be stored?**

We process and store your personal data as long as it is necessary for the fulfillment of our contractual and legal obligations. We delete your personal data as soon as they are no longer required for the above-mentioned purposes. Personal data may be stored for the period during which claims can be asserted against our companies (statutory limitation periods of three or up to thirty years). In addition, we store your personal data insofar as we are legally obligated to do so. Corresponding verification and storage obligations result from commercial, tax and social security regulations. Furthermore, we store business-relevant documents and e-mails for the purpose of legally secure archiving for tax purposes and documentation for the defense against unjustified claims and enforcement of claims. The storage period for tax and commercial law is usually 6 or 10 years at the end of a fiscal year in accordance with sect. 147 tax code (AO), sect. 257 commercial law book (HGB).

## **7. Obligation to provide data**

We process your personal data insofar as it is necessary for the fulfillment of our contractual and legal obligations and for the protection of our legitimate interests or you have given us your consent. In the context of the performance or initiation of a contract, you must provide the personal data required for the performance of the contract or the performance of pre-contractual measures and the associated obligations. Furthermore, you must provide the personal data that we are legally obligated to collect. Without the provision of this data, we will not be able

to conclude or fulfill a contract with you. Furthermore, you must provide the required information during your visit so that we can grant you access to the company premises and the buildings.

In cases of data collection based on consent, the provision of data by you is voluntary and not mandatory.

## **8. To what extent is there automated decision-making (including profiling)?**

For the establishment and implementation of the business relationship, we generally do not use fully automated decision making according to art. 22 GDPR. Profiling does not take place.

## **9. What data protection rights do I have?**

You have the following rights towards us as the data controller. If you wish to exercise your rights or would like more information, please contact us or our data protection officer:

### **a) Rights according to art. 15 ff. GDPR**

The involved person has the right to obtain confirmation from the controller as to whether personal data concerning him or her are being processed. If this is the case, he or she has the right of information about this personal data and to the information listed in detail in art. 15 GDPR. Under certain legal conditions, you have the right to rectification under art. 16 GDPR, the right to restriction of processing under art. 18 GDPR and the right to erasure ("right to be forgotten") under art. 17 GDPR. In addition, you have the right to receive the data you have provided in a structured, common and machine-readable format (right to data portability) in accordance with art. 20 GDPR, provided that the processing is carried out with the help of automated processes and is based on consent in accordance with art. 6 para. 1 lit. a) or art. 9 para. 2 lit. a) or on a contract in accordance with art. 6 para. 1 lit. b) GDPR. The restrictions according to sect. 34 and 35 German Federal Data Protection Act (BDSG) apply to the right to information and the right to deletion.

### **b) Revocation of consent**

If the processing is based on consent, e.g. for film and photo shoots, you can revoke your consent to the processing of personal data at any time according to art. 7 para. 3 GDPR. The revocation of consent does not affect the lawfulness of the processing carried out on the basis of the consent until the revocation. The involved person will be informed of this before giving consent.

**c) Right of appeal**

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint to us or to a data protection supervisory authority according to art. 77 GDPR in conjunction with sect. 19 German Federal Data Protection Act (BDSG).

**d) Right of objection according to art. 21 GDPR**

In addition to the aforementioned rights, you have the right to object as follows:

**Right to object on a case-by-case basis**

You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you which is carried out on the basis of art. 6 para. 1 lit. f) GDPR (data processing on the basis of legitimate interests); this also applies to a profiling based on this provision within the meaning of art. 4 para. 4 GDPR, where applicable. If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate reasons for the processing which override your interests, rights and freedoms, or the processing serves the purpose of asserting, exercising or protecting your rights.

**Right to object to the processing of data for advertising purposes**

In individual cases, we process your personal data for the purpose of direct advertising. 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 related to such direct advertising. If you object to processing for direct marketing purposes, we will no longer process your personal data for these purposes. The objection can be made informally to the office indicated under point 1.

**b) Changes to our privacy policy**

We reserve the right to change our security and data protection measures if required due to technical developments or legal changes. In such cases, we will also update our privacy policy accordingly. Please refer to the latest version of our privacy policy.

**10. Final provision**

**a) Security**

We have implemented technical and organizational security measures in accordance with Art. 24 and 32 GDPR to protect your personal data against loss, destruction, manipulation, and unauthorized access. All our employees and all third parties involved in data processing are obliged to comply with the requirements of the GDPR and to treat personal data confidentially.