

## **Data protection information for customers and interested parties** according to Art. 13, 14 and 21 of the General Data Protection Regulation (GDPR)

Data protection is of the utmost importance to us. We will inform you below about how we process your data and your rights.

### **1. Who is responsible for data processing and who can you contact?**

Sommer cable GmbH  
Humboldtstraße 32 - 36  
75334 Straubenhardt  
Tel.-Nr.: +49 7082 491330  
E-Mail: [datenschutz@sommercable.com](mailto:datenschutz@sommercable.com)  
Internet: [www.sommercable.com](http://www.sommercable.com)

### **2. Data protection officer contact details**

Christoph Boser  
Tel.-Nr.: +49 7082 491330  
E-Mail: [datenschutz@sommercable.com](mailto:datenschutz@sommercable.com)

### **3. Processing purposes and legal basis**

Your data is processed 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 individual data depends on the agreed or requested service.

#### **3.1 Consent (Art. 6. Para. 1 (a) GDPR)**

If you have given us your consent to the processing of personal data, this consent is the legal basis for the processing stated there. You can revoke your consent with effect for the future at any time.

#### **3.2 Fulfilling contractual obligations (Art. 6 Para. 1 (b) GDPR)**

We process your personal data in order to execute our contracts and agreements with you. Furthermore, your personal data will be processed for the implementation of measures and activities within the framework of pre-contractual relationships.

#### **3.3 Fulfilling legal obligations (Art. 6 Para. 1 (c) GDPR)**

We process your personal data when this is necessary for fulfilling legal obligations (e.g. commercial or tax laws). Furthermore, we process your data if necessary for the fulfilment of fiscal control and reporting obligations as well as for the archiving of data for the purposes of data protection and data security as well as for audits by tax and other authorities. Furthermore, the



disclosure of personal data within the framework of official/judicial measures may become necessary for the purposes of taking evidence, prosecution or enforcement of civil law claims.

### **3.4 Legitimate interests pursued by us or third parties (Art. 6 Para. 1 (f) GDPR)**

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

- Reviewing and optimisation of procedures for needs analysis and direct customer approaches.
- For advertising or market research, if you have not objected to the use of your data.
- For the limited storage of your data, if deletion is not possible or only possible with disproportionate effort due to the special type of storage.
- For the further development of services and products as well as existing systems and processes.
- For statistical evaluations or for market analyses.
- For internal or external audits and/or security checks.
- For certifications of private law or official matters.

## **4. Categories of personal data that we process**

The following data is processed:

- Personal data (name, occupation/industry and comparable data)
- Contact details (address, e-mail address, phone number and comparable data)
- Customer history

We also process personal data from public sources (e.g. internet, media, press)

## **5. Who will receive your data?**

We pass on your personal data within our company to those areas that require it to fulfil contractual and legal obligations or to implement our legitimate interests.

In addition, the following may receive your data:

- processers employed by us (Art. 28 GDPR), service providers for supporting activities and other persons responsible in terms of the GDPR, in particular in the areas of IT services, logistics, courier services, printing services, external data centres, support/maintenance of IT applications, archiving, document processing, accounting and controlling, data destruction, purchasing/procurement, customer administration, letter shops, marketing, telephony, website management, tax consultancy, auditing services, credit institutes
- public authorities and institutions in the event of a legal or official obligation under which we are obliged to disclose, report or pass on data
- other bodies for which you have given us your consent for the transmission of data.

## **6. Transmitting your data to a third country or an international organisation**

We reserve the right to pass on addresses with company headquarters outside the EU or the EEA to our respective responsible country distributor.

## **7. How long do we store your data?**

If necessary, we process your personal data for the duration of our business relationship, this also includes the initiation and processing of a contract. In addition, we are subject to various storage and documentation obligations, in accordance with the German Commercial Code (HGB) and the Tax Code (AO) among others. The periods for storage or documentation specified are up to ten years beyond the end of the business relationship or the pre-contractual legal relationship. Ultimately, the storage period is also assessed according to statutory limitation periods, which, for example, according to §§ 195 ff. of the German Civil Code (BGB) can generally be three years, but in certain cases, up to thirty years.

## **8. To what extent is automated decision making used?**

We do not use purely automated decision-making procedures in accordance with Article 22 GDPR. If we use these procedures in individual cases, we will inform you separately, insofar as this is required by law.

## **9. Your data protection rights**

You have the right of access pursuant to Art. 15 GDPR, the right to rectification pursuant to Art. 16 GDPR, the right to erasure pursuant to Art. 17 GDPR, the right to restriction of processing pursuant to Art. 18 GDPR and the right to data portability pursuant to Art. 20 GDPR

Moreover, you have the right to lodge a complaint with a supervisory authority (Art. 77 GDPR). In principle, you have the right to object to us processing your personal data in accordance with Article 21 GDPR. However, this right only applies in the event of very special circumstances in your personal situation, whereby our company's rights may conflict with your right to object. If you wish to assert any of these rights, please contact our data protection officer ([datenschutz@sommercable.com](mailto:datenschutz@sommercable.com)).

## **10. In Scope of your obligations to provide us with your data**

You only need to provide data which are necessary for the establishment and implementation of a business relationship or for a pre-contractual relationship with us or data we are legally obliged to collect. Without this information, we will usually not be able to conclude or perform the contract. This may also refer to data required later on in the business relationship. If we request further data from you, you will be separately informed of the voluntary nature of the provision of the information.

## **11. Information regarding your right to object (Art. 21 GDPR)**

You have the right to object at any time to the processing of your data on the basis of Art. 6 Para. 1 (f) GDPR (data processing for the purposes of a balance of interests) or Art. 6 Para. 1 (e) GDPR (data processing in the public interest), if there are reasons for this arising from your particular situation. This also applies to profiling based on this provision according to Art. 4 No. 4 GDPR. If you do object, we shall no longer process your personal data unless the we can



demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or the processing is required for the establishment, exercise or defence of legal claims. We may also process your personal data for direct marketing purposes. If you do not wish to receive advertising, you have the right to object at any time. We will take this objection into account for the future.

We will no longer process your data for direct marketing purposes if you object to processing for these purposes. The objection can be sent to the address listed under point 1.

## **12. Your right to complain to a supervisory authority**

You have the right to lodge a complaint with the data protection supervisory authorities (Art. 77 GDPR). The responsible supervisory authority is:

Landesbeauftragte für Datenschutz und Informationsfreiheit Baden-Württemberg  
Königstrasse 10 a  
70173 Stuttgart  
Telefon: 0711/615541-0  
[poststelle@fdi.bwl.de](mailto:poststelle@fdi.bwl.de)