

WHO PROCESSES YOUR PERSONAL DATA

Stahl GmbH with its registered office at Lutherstrasse 54, 73614 Schorndorf, Germany, is the controller of your personal data, meaning it is responsible to process your personal data in compliance with GDPR and other applicable laws, as well as any agreement, and apply appropriate security measures.

CONTACT DETAILS

You may contact us at any time in relation to your personal data processed by us.

Contact details: **Stahl GmbH**, Lutherstrasse 54, 73614 Schorndorf, Germany

Contact details of representative for information security: **gdpr.de@rawlplug.com**

WHAT IS THE PURPOSE AND LEGAL BASIS OF PROCESSING

Your personal data, as well as personal data of people contacting us in your name, collected at the moment of concluding and performing contracts to supply goods or services by us, are processed for purposes and on legal grounds as follows:

- 1) **prepare, conclude and perform a contract between us**, for the duration of a contract and its settlement afterwards – on the basis of article 6 par. 1.b GDPR (hereafter referred to as “performance of a contract”);
- 2) **comply with all legal obligations imposed on us**, such as storing of invoices, carrying out warranties claims and similar claims, evidencing transactions etc., for the time necessary to comply with such obligations - on the basis of article 6 par. 1.c GDPR (hereafter referred to as “legal obligation”);
- 3) **determine, protect and enforce any of our rights**, including assignment of claims against you to third parties, for the time no longer than limitation period - on the basis of article 6 par. 1.f GDPR (hereafter referred to as “legitimate interest”); or for the time necessary to carry out obligations regarding evidencing of transactions - on the basis of legal obligation.
- 4) **carry out summaries, analysis, statistics**, for the time necessary to carry out such activities – on the basis of legitimate interest;
- 5) **direct marketing**, for the duration of a contract – on the basis of legitimate interest.
- 6) **governing the sales, including customer service and analysis of your financial capacity**, for the time needed to render these activities while concluding a contract and any future contracts – on the basis of performance of a contract;
- 7) **providing sales-related services**, connected with a contract (for example, for technical advisory, trainings, product information, access to professional platforms etc.), on the basis of a separate agreement, for the time needed to perform these services – on the basis of performance of a contract.

Personal data collected for purposes other than compliance with legal obligation may be subject of profiling, which is an automated processing of personal data to analyse or predict aspects concerning your personal preferences or behaviour (for example, to personalize marketing content sent to you).

We collect and process personal data for other purpose than above only with your expressed consent and only within the scope of such consent. You are entitled to withdraw the consent at any time, however the withdrawal of the consent will not affect the lawfulness of processing based on consent before its withdrawal.

WHAT PERSONAL DATA WE PROCESS?

At the moment of concluding a contract we request you to provide us with personal data indicated in an order or standard contract forms (if your do not provide us with these data, we will not conclude a contract), regardless we use standard contract or order forms in a particular situation.

The provision of the above personal data **is voluntary**, however necessary for us to enter into and perform a contract as well as contracts for sales-related services.

SHARING OF THE INFORMATION RAWLPLUG RECEIVES

We share your personal information with:

- 1) **processors processing data on our behalf** with regards to activities rendered on our behalf:
 - a) purchasing agents and other intermediaries in the process of purchasing goods and services;
 - b) suppliers of marketing services for us;
 - c) administrators of our IT systems and providing us with IT tools and resources;
 - d) sub-contractors helping us in performing a contract, for example custom agents, carriers;
 - e) advisors, consultants, auditors, legal and tax advisors, accountants etc.
- 2) **other controllers** processing data in their own name:
 - a) purchasing agents and other intermediaries in the process of purchasing goods and services – to settle their remuneration;
 - b) couriers and post offices;

- c) payment institutions – to process any payments from or to you;
- d) assignees – in case of assignment of claims that we may have against you;
- e) government authorities, judiciary, local authorities – if it is necessary under applicable laws.

TRANSFER OF PERSONAL DATA OUTSIDE EUROPEAN ECONOMIC AREA (EEA)

We intend to transfer your personal data outside EEA (territory of European Union, Norway, Iceland, Switzerland and Lichtenstein) only to the members of Rawlplug Group¹ in compliance with applicable laws and applying appropriate security measures. Current information may be found on gdpr.rawlplug.com

AUTHOMATED INDIVIDUAL DECISION MAKING

We do not issue any decision basing on automated data processing which produces a legal effect concerning you or considerably affects you.

YOUR RIGHTS

GDPR gives you following rights in relation to your personal data:

- 1) **accessing your personal data** (including receiving copies of them) – under article 15 GDPR;
- 2) **correcting your personal data** – under article 16 GDPR;
- 3) **deleting your personal data** – under article 17 GDPR;
- 4) **to demand restriction of processing** – under article 18 GDPR;
- 5) **to demand transmission of personal data** – under article 20 GDPR.

You may enforce the above rights by contacting our representative for data protection or sending a respective email to our address: gdpr.de@rawlplug.com

We may require additional information enabling us to verify your identity and your right to enforce the above rights.

RIGHT TO OBJECT

Apart from rights referred to in preceding paragraphs, you have the right to object, at any time, to processing of your personal data by us (including profiling) for direct marketing purpose. After filing the objection, we will restrain from processing your data for this purpose.

You have also right to object, on grounds relating to your particular situation, at any time to processing of your personal data which is based on legitimate interest or public interest (including profiling). The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

COMPLAINT

You have the right to lodge a complaint to: **Die Bundesbeauftragte für den Datenschutz und die Informationsfreiheit** Husarenstraße 30, 53117 Bonn, Tel. +49 228 997799 0; +49 228 81995 0, Fax +49 228 997799 550; +49 228 81995 550, email: poststelle@bfdi.bund.de, Website: <http://www.bfdi.bund.de/>

- if you are of the opinion that we process your personal data illegally.

¹ **Rawlplug S.A.**, ul. Kwizdyńska 6c, 51-416 Wrocław, Poland; **Koelner Rawlplug IP sp. z o.o.**, ul. Kwizdyńska 6, 51-416 Wrocław, Poland; **Koelner Polska Sp. z o.o.**, ul. Kwizdyńska 6c, Wrocław 51-416, Poland;; **Koelner- Inwestycje Budowlane Sp. z o.o.**, ul. Kwizdyńska 6, Wrocław 51-416, Poland; **Rawlplug Ltd**, Skibo Drive, Thornliebank Industrial Estate, Glasgow G46 8JR, the United Kingdom; **Koelner Deutschland GmbH**, Lutherstr. 54, 73614 Schorndorf, Germany; **RAWL France SAS**, ZI Mityr-Compans, 12-14 Rue Marc Seguin, 77290 Mityr-Mory, France; **Rawlplug Middle East FZE**, P.O. Box 261024, Jebel Ali Free Zone, Dubai, UAE; **Rawlplug Building & Construction Material Trading (L.L.C.)**, Al Qouz Industrial Area 3, 22 ND Street, Compound 81, P. O. Box 261024 Dubai, UAE; **Rawl Scandinavia AB**, Baumangatan 4, 593 32 Västervik, Sweden; **Rawlplug Ireland Ltd**, Unit 10 Donore Business Park, Donore Road Drogheda, Co Louth, Ireland; **Koelner CZ s.r.o.**, Komerční Park Tulipan, Palackého 1154/76A (hala T3), 702 00 Ostrava-Privoz, Czech Republic; **KOELNER Slovakia s.r.o.**, Dlhá 95, 010 09 Žilina, Slovakia; **Koelner Hungária Kft.**, Jedlik Ányos u. 34, 2330 Dunaharaszti, Hungary; **UAB Koelner Vilnius**, Žarijų g. 2, LT-02300, Vilnius, Lithuania; **Koelner Ukraine LLC**, vul. Naukova 3a, 79060 Lviv, Ukraine; **Koelner Trading KLD LLC**, ul. Dzerzhinskogo 219, 236034 Kaliningrad, Russia; **Rawlplug Singapore Pte. Ltd.**, 25B, Loyang Crescent, Block 302, #04-11, Loyang Offshore Supply Base, Singapore 506817 #05-34, Singapore; **Rawlplug Shanghai Trading Co. Ltd.**, 1/F, Building 1 No.251 Yaohua Rd, Shanghai Free Trade Zone, China; **Rawlplug Inc.**, Corp. Trust Center 1209 Orange St. New Castle, Delaware DE 19801, USA.