



Data Privacy Policy of Poly-clip System GmbH & Co. KG

Valid from April 2021

The following Data Privacy Policy outlines how we will collect and process your data.

The responsible handling of personal data is of utmost importance to us and is a matter of course. If we receive personal data from you, we will use and process such data in compliance with applicable national and European data protection laws. Personal data within the meaning of this Policy include any information that relates to you.

In the following Data Privacy Policy we have outlined how we will process your personal data and what rights you have under data protection law.

1. DATA CONTROLLER AND DATA PROTECTION OFFICER

The data controller is:

Poly-clip System GmbH & Co. KG
Niedeckerstraße 1
65795 Hattersheim am Main

Our data protection officer can be reached as follows:

Poly-clip System GmbH & Co. KG
Data protection officer
Niedeckerstraße 1
65795 Hattersheim am Main
Email: datenschutz@polyclip.de

2. SOURCE OF PERSONAL DATA

We will process personal data that we receive when you visit our websites or contact us.

3. CATEGORIES OF PROCESSED PERSONAL DATA

(1) If you visit our website for information purposes only, we will collect no personal data with the exception of data that are transmitted by your browser to enable you to visit our website.

- Your IP address, whose last segment will be truncated.
- The remote host (name of the computer that accesses the website), if transmitted by the network.
- Date, time, status, and transmitted data volume.
- The website from which you were referred to the accessed website (referrer), if transmitted by the browser.
- Information about the browser product and browser version used (user-agent), if transmitted by the browser.



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- If your user name should be transmitted by your network, it will not be stored by us.

Such data will not be merged with any other data sources. Collection of such data is based on Art. 6 para. 1 sent. 1 f) GDPR. The website operator has a legitimate interest in the technically error-free presentation and optimization of its website - for this purpose, server log files must be tracked.

(2) In addition, your browser stores so-called cookies. Cookies are small text files which are stored on your device by your browser and which provide the party that places the cookie (in this case, us) with certain information. Their purpose is to make the website more user-friendly and more effective all around.

This website uses the following cookies:

- **Transient cookies:** These cookies are automatically deleted when you close the browser. They include, in particular, session cookies. These cookies store a so-called session ID, with which various requests from your browser can be assigned to the joint session. Session cookies are deleted when you log out or close the browser.
- **Persistent cookies:** These cookies are automatically deleted after a specified duration, which may differ depending on the cookie. You can delete cookies in the security settings of your browser at any time.

Collection of such data is based on Art. 6 para. 1 sent. 1 a) or f) GDPR.

(3) In addition to purely informational use of our website we offer various services that you may use if you are interested. To use those services, you will generally have to provide additional personal data, which we will then use to provide the service you have selected. Collection of such data is based on the legal justification stated for each service.

4. CONTACT FORM

If you contact us by email or via the contact form, your email address and, if you provide this information, your name, address and telephone number will be stored by us in order to answer your questions.

We collect, process, and use such data for purposes of entering into and performing contracts with you and to protect our own legitimate business interests with regard to the consultation and support of our customers and interested parties as well as needs-based product design.



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We will use your data (company, name, address, product interest) to occasionally send you information about our products by mail. You will receive advertising by telephone or email only if you have given us your express permission to do so.

Processing of your personal data in connection with the contact form will be based on consent in accordance with Art. 6 para. 1 set. 1 a) GDPR.

5. USE OF GOOGLE reCAPTCHA

To protect your orders, we use the reCAPTCHA service of Google Inc. (Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001; hereinafter "Google"). The purpose of the query is to distinguish information entered by humans from misuse by web robots (bots). The query includes sending the IP address and possibly additional data needed by Google for its reCAPTCHA service to Google. For this purpose data you enter will be transmitted to Google, where it will be processed further. If IP anonymization is activated on this website, your IP address will however first be truncated by Google within member states of the European Union or in other signatory states to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transferred to a server of Google in the United States and truncated there (for data transfers to the United States, see Section 13 below). On behalf of the operator of this website Google will use this information to analyze your use of this service. The IP address transmitted by your browser to reCAPTCHA will not be merged with any other data of Google. Such data are subject to the different data privacy policy of Google.

Processing of your personal data will be based on your consent in accordance with Art. 6 para. 1 sent. 1 a) GDPR.

[- Overview of Data Privacy](#)

[- Google Data Privacy Policy](#)

6. GOOGLE UNIVERSAL ANALYTICS

This website uses Google Universal Analytics with IP anonymization, a web analysis service of Google Inc. (Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001; hereinafter "Google"). Google Universal Analytics uses cookies. Information about your use of this website generated by the cookie will generally be transferred to a Google server in the United States and stored there. By activating IP anonymization on this website your IP address will however be masked by Google within member states of the European Union or other signatory states to the Agreement on the European Economic Area before your data will be transferred to the United States (for data transfers to the United States, see Section 13 below). On behalf of the operator of this website Google will use such information to analyze your use of the website, to prepare reports about website activities, and to provide additional services related to website use and Internet use to the website operator.



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The IP address transmitted by your browser in connection with Google Universal Analytics will not be merged with any other data of Google.

Processing of your personal data will be based on your consent in accordance with Art. 6 para. 1 set. 1 a) GDPR.

Beyond the cookie settings of your browser you can also prevent Google from tracking data generated by the cookie about your use of the website (including your IP address) as well as from processing such data by downloading and installing the browser plug-in that is available at this [link](#).

Please note that on this website Google Universal Analytics has been extended by the code "ga('set', 'anonymizelp', true);" to guarantee anonymous tracking of IP addresses (so-called IP masking). As a result, IP addresses are processed in truncated form ruling out any possibility of associating an IP address directly with a particular person.

We use Google Analytics in order to be able to analyze and continuously improve use of our website. The statistical data generated by Google Analytics allow us to improve our products and services and to make them more interesting to you as a user.

[- Google Analytics Terms of Use](#)

[- Overview of Data Privacy](#)

[- Google Data Privacy Policy](#)

7. USERCENTRICS CONSENT MANAGEMENT PLATFORM

We use the Usercentrics Consent Management Platform (Usercentrics) of Usercentrics GmbH, Rosental 4, 80331 Munich, Germany. Usercentrics collects log file data and consent data using JavaScript. JavaScript enables us to inform users about their consent to certain cookies and other technologies on our website and to obtain, manage, and document this consent.

The legal basis for the processing of such data is Art. 6 para. 1 sent. 1 c) GDPR. The purpose is to get to know the preferences of users and to act accordingly.

Such data will be deleted as soon as they are no longer needed for our logging purposes.

You can permanently prevent the execution of JavaScript at any time by choosing the appropriate settings in your browser, which would also prevent Usercentrics from executing JavaScript.

[- Usercentrics Privacy Policy](#)



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8. Integration of YouTube

We have integrated YouTube videos into our website, which are stored at <http://www.YouTube.com> and can be played directly from our website. All videos are integrated in "expanded data protection mode", which means that no data about you, the user, will be transmitted to YouTube if you do not play the videos.

Only when you play videos will the data described below be transferred. We have no influence on such data transfers. Our data processing is based on Art. 6 para. 1 sent. 1 a) GDPR.

As a result of your visit of the website, YouTube - a service of Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001) - will receive the information that you have accessed the corresponding subpage of our website. This will occur regardless of whether YouTube provides a user account via which you are logged in or whether no user account exists. If you are logged in to Google, your data will be directly assigned to your account. If you do not want data to be assigned to your profile at YouTube, you must log out before activating the button. YouTube will store your data in the form of user profiles and use them for the purposes of advertising, market research, and/or demand-oriented design of its website. Such an analysis will be performed in particular (even for users who are not logged in) to provide demand-oriented advertising and to inform other users of the social network about your activities on our website. You have the right to object to the creation of such a user profile, and you must contact YouTube to exercise this right. Google will also process your personal data in the United States (for data transfers to the United States, see Section 13.).

[- Google Data Privacy Policy](#)

9. USE OF OUR B2B-WEBSHOP

We offer you the opportunity to order various machines and products via our B2B webshop. Poly-clip System will create a user account for you, in which all your customer data already stored with Poly-clip System (e.g., name of company, name of the ordering employee, email address, delivery address) will be stored. Poly-clip System will process such data to process your order and perform the associated contract. Processing of your personal data will be based on Art. 6 para. 1 sent. 1 b) GDPR.

Furthermore, we will send specific offers of our webshop to your user account.

In order to log into the Poly-clip System webshop, all you will need is your email address stored in our system and the personal password generated for you by us. This password can be changed by you after the first login.

10. NEWSLETTER

We use the so-called double opt-in procedure to register for our newsletter. This means that we will send you a confirmation email to the email address you have provided, in



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which we will ask you to confirm that you wish to receive the newsletter. Processing of your personal data in connection with the newsletter will be based on Art. 6 para. 1 sent. 1 a) GDPR.

You may revoke your consent to receive the newsletter at any time. You can revoke your consent by clicking on the link provided in every newsletter email, by sending an email to online.information@polyclip.com or by sending a message to: Poly-clip System GmbH & Co. KG, Academy/Communication, Niedeckerstraße 1, 65795 Hattersheim am Main, Tel.: +49 6190 8886-931, Fax: +49 6190 8886-15931.

11. PURPOSES FOR WHICH PERSONAL DATA ARE PROCESSED, AND LEGAL BASIS OF DATA PROCESSING

We will process your personal data in compliance with applicable national and European data protection requirements. Data processing is lawful if at least one the following conditions is satisfied:

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

If you have consented to processing of your personal data for certain purposes (e.g., use of your data for marketing purposes, cookie use, newsletter, contact form), such processing is lawful based on your consent. Consent may be revoked at any time with effect for the future.

b. Performance of contractual obligations or precontractual measures (Art. 6 para. sent. 1 b) GDPR)

We process personal data to perform contracts in order to comply with our contractual obligations or to take requested precontractual measures. The purposes of data processing primarily depend on the specific contractual relationship and may include requirements analyses and consulting. You can find additional details about data processing purposes in the contract documentation and general terms and conditions.

c. Legal requirements (Art. 6 para. 1 sent. 1 c) GDPR)

Poly-clip is subject to various legal obligations (e.g., recordkeeping obligations under the German Commercial Code and German Tax Code). Purposes of data processing include compliance with control and reporting obligations under applicable tax law as well as risk assessment and risk management within the company and the group.

d. Legitimate interests (Art. 6 para. 1, sent. 1 f) GDPR)

To the extent necessary, we will process your data beyond the actual performance of the contract in order to protect our own legitimate interests or those of third parties. Examples:



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- Revision and improvement of procedures for general business management and upgrading of products and services
- Advertising, customer satisfaction, unless you have objected to such use of your data
- Prosecution or defense of claims in legal actions
- Prevention and investigation of criminal offenses

12. CATEGORIES OF RECIPIENTS OF PERSONAL DATA

For some of the aforementioned processes and services we have carefully selected third-party service providers in conformity with applicable data protection law. Such third-party service providers are bound by our instructions and are audited by us on a regular basis. They will not transfer your data to third parties.

In terms of transferring data to other recipients, we will transfer information about you only if we are required to do so by law, if you have consented, or if we otherwise have the right to transfer your data. Provided that these requirements are satisfied, we may transfer personal data, for example, to the following recipients:

- Government agencies and institutions (e.g., tax authorities, criminal investigation authorities), if there is a legal or regulatory obligation.
- Other companies or comparable institutions to whom we transfer your personal data for the purpose of our business relationship with you (e.g., network operators, credit bureaus).
- Other group affiliates (e.g., to settle payment transactions or to manage risks in compliance with legal obligations).

13. INTENTION TO TRANSFER PERSONAL DATA TO THIRD COUNTRY OR INTERNATIONAL ORGANIZATION

An active transfer of personal data to a third country or to an international organization will only take place if this has been expressly disclosed in connection with the aforementioned services and if the requirements of Art. 44 et seq. GDPR are satisfied. A third country is any country outside the European Economic Area (EEA) in which the GDPR is not directly applicable. The EU Commission has not issued an adequacy decision for the United States pursuant to Art. 45 (1) GDPR.

14. CRITERIA FOR DETERMINING THE TIME PERIOD FOR WHICH PERSONAL DATA ARE STORED

The time period of data storage depends on when the purpose of data processing ends and on any subsequent legal recordkeeping obligations. If data are no longer needed for the performance of contractual or legal obligations, they will generally be erased unless continued processing – for a limited time period and, if applicable, on a restricted basis – is necessary for any of the following purposes:



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- Compliance with recordkeeping obligations under commercial law or tax law: we are subject to recordkeeping and documentation obligations of up to 10 years under the German Commercial Code (HGB) and the German Tax Code (AO).
- Preservation of evidence for statutory limitation periods: under §§ 195 et seq. of the German Civil Code (BGB) the standard limitation period is three years, but under certain circumstances may be as long as 30 years.

15. RIGHTS OF DATA SUBJECTS

You may at any time request information about your stored personal data, the purpose for which your personal data are stored, and/or the source of your personal data. In addition, you may at any time have your personal data blocked, corrected, or erased. Requests for information about your personal data or requests for correction, blocking, or erasure of your personal data should be sent to:

Poly-clip System GmbH & Co. KG, Academy/Communication, Niedeckerstraße 1, 65795 Hattersheim am Main, Germany, phone: +49 6190 8886-931, fax: +49 6190 8886-15931, web: online.information@polyclip.com. All requests for information, correction, blocking, or cancellation as well as any revocation of consent to the collection, use, or processing of data should be sent to the above mailing address or email address. You also have the right to lodge complaints with the data protection regulatory authorities.

Consent to processing of your personal data may be revoked at any time with effect for the future. The same also applies to revocation of any declarations of consent that were provided before the GDPR took effect, i.e., before May 25, 2018.

You have a right to object at any time to the processing of your personal data based on Article 6 para. 1 sent. 1 e) GDPR (data processing in the public interest) or Article 6 para. 1 sent. 1 f) GDPR (data processing on the basis of a legitimate interest) if the reasons for the objection involve special personal circumstances; this also applies to profiling within the meaning of Art. 4 no. 4 GDPR on the basis of that provision.

In some cases your personal data will be processed for direct advertising purposes. You have the right to object to processing of your personal data for direct advertising purposes at any time; the same applies to any profiling related to such direct advertising.

If you object to processing of your personal data for direct advertising purposes, your personal data will no longer be processed for such purposes.

If you object, we will no longer process your personal data, unless we can show that there are compelling, protected reasons for processing your data that outweigh your interests, rights, and freedoms, and unless your data are processed to assert, exercise, or defend legal rights or claims.

Objections may be made informally and should be addressed as shown above.



16. OBLIGATION TO PROVIDE DATA, AND FINANCIAL CONSEQUENCES OF FAILURE TO PROVIDE DATA

In connection with our business relationship you are required to make available those personal data that are necessary for entering into and performing our business relationship with and for performing our contractual obligations associated therewith and those personal data that we are required to collect by law. Without such data, we will generally not be able to enter into or perform any contracts with you.

17. NO AUTOMATED DECISION-MAKING PROCESS, INCLUDING PROFILING

We generally use no automated decision-making process within the meaning of Art. 22 GDPR to enter into or perform our business relationship with you. If we use such a process in exceptional cases, we will inform you separately if required by law.

18. DATA SECURITY

We will protect your information using modern security systems and comply with data privacy and security provisions of the GDPR.

We will maintain up-to-date technical measures to ensure data security, in particular to protect your personal data from risks during data transfers and from third-party access. These measures will be updated to reflect the latest state of the art.

Completed online forms on our website are sent with SSL encryption to protect data you enter. Nevertheless, we cannot guarantee that information transmitted by you cannot be viewed by third parties during transfer. Therefore, you should never transmit passwords, credit card numbers, or other information that you wish to keep secret.