

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

Handling personal data responsibly is of utmost importance to us and we do so as a matter of course. Whenever we obtain, use or process personal data, we do so in compliance with the applicable national and European data protection laws. Personal data within the meaning of this notice is any information that may relate to you personally.

The following privacy policy provides an overview of how we process your personal data and your rights in this respect under data protection law.

1. DATA CONTROLLER AND DATA PROTECTION OFFICER

Your personal data is processed by a Poly-clip Group company. Below you will find the respective Data Controller and their Data Protection Officers in connection with the processing of your personal data - the responsibility of the responsible body depends on which company you work with:

Data Controller	Data Protection Officer
Poly-clip System GmbH & Co. KG Niedeckerstraße 1 65795 Hattersheim am Main	Poly-clip System GmbH & Co. KG The Data Protection Officer E-Mail: datenschutz@polyclip.de
Poly-clip System Consumables GmbH Am Stillhof 6 63688 Gedern	Poly-clip System Consumables GmbH The Data Protection Officer E-Mail: datenschutz@polyclip.de
Lanitech GmbH Otto-Volger-Straße 7a 65843 Sulzbach	FPS Rechtsanwaltsgesellschaft mbH & Co. KG Eschersheimer Landstraße 55 60322 Frankfurt am Main E-Mail: datenschutzbeauftragter@fps-law.de
Quota GmbH Niedeckerstraße 1 65795 Hattersheim am Main	

2. SOURCE OF PERSONAL DATA

We process your personal data in compliance with the EU General Data Protection Regulation (GDPR), the German Federal Data Protection Act (BDSG) and all other relevant national regulations. Your contact details (name, company, contact, working hours) are recorded in the visitor management system in order to process your visit as well as to safeguard the domiciliary right and protect our legitimate interests (Art. 6 Para. 1 a) and f) GDPR) according to the requisite security standards.

We may also collect personal data within the context of video surveillance in certain areas of the company premises, e.g. entrances to the premises/buildings or car parks (Art. 6 Para. 1 et. seq.) GDPR, § 4 BDSG)

3. CATEGORIES OF PERSONAL DATA PROCESSED

Your personal data is collected or recorded in our visitor management system or directly from you at reception.

4. CRITERIA FOR DETERMINING THE DURATION OF STORAGE OF PERSONAL DATA

The criteria for determining the duration of storage are based on the end of the purpose and the subsequent statutory retention period. If the data is no longer required after completion of the above-mentioned purposes or for the fulfilment of legal obligations, it will be erased.

4. PURPOSES FOR WHICH PERSONAL DATA ARE PROCESSED, AND LEGAL BASIS OF DATAPROCESSING

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. 1 a) GDPR)

If you have consented to processing of your personal data for certain purposes (e.g., Video/photo recordings), such processing is lawful based on your consent. Consent 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.

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

We process data in order to fulfill our contractual obligations or to carry out pre-contractual measures. The purposes of data processing arise primarily from the employment relationship. In particular, data is processed

- a) to record access times;
- b) to enable data processing in connection with office activities, in particular the use of the "Microsoft 365" program package, including Microsoft SharePoint;
- c) access logging.

c. Legal requirements (Art. 6 para. 1 c) GDPR) or public interest (Art. 6 para. 1 e) GDPR)

Poly-clip System is subject to various legal obligations (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.

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

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

- Asserting legal claims and defending against legal disputes;
- Ensuring IT security and IT operations;
- For official logging and communication purposes, prevention and investigation of criminal offenses.

5. CATEGORIES OF RECIPIENTS OF PERSONAL DATA

Persons within the company in roles that require access to personal data in order to fulfil our legal obligations are authorised to access said data. Poly-clip System also has some of the above-mentioned processes and services carried out by carefully selected and data protection-compliant service providers based within the EU. With regard to transferring data to other recipients, we are only permitted to pass on information about you if this is required by law, if you have given your consent or if we are authorised to pass it on.

6. DATA PROTECTION RIGHTS

Every data subject has the right to information according to Art. 15 GDPR, the right to correction according to Art. 16 GDPR, the right to erasure according to Art. 17 GDPR, the right to restrict processing according to Art.18 GDPR, the right of objection pursuant to Art. 21 GDPR and the right to data portability pursuant to Art. 20 GDPR. The restrictions of §§ 34 and 35 BDSG apply to the right to information and the right to erasure. In addition, there is a right of appeal to a competent data protection supervisory authority (Art. 77 GDPR in conjunction with § 19 BDSG).

You can revoke your consent to our processing of your personal data at any time with effect for the future. This also applies to the revocation of declarations of consent that were given to us before the General Data Protection Regulation came into effect, i.e. before 25 May 2018. The objection can be made informally and should be addressed to the Data Protection Officer using the contact details above.

7. IS THERE AN OBLIGATION TO PROVIDE PERSONAL DATA AND WHAT ARE THE POSSIBLE CONSEQUENCES OF NOT PROVIDING IT?

During the visit, you must provide the personal data that is required for this purpose or that we are legally entitled or obliged to collect.