



Elmenhorst, 24.05.2018

Data Protection Guidelines

Information on data protection for clients and other data subjects*

With the following information, we would like to give you an overview on the processing of your personal data by us and your rights under data protection law. Which data are processed in detail and the manner in which they are used is predominantly determined by the services requested or agreed. Therefore, not every element of this information may be applicable to you.

**e.g. authorised representatives, potential customers of products, non-customers such as providers of third-party collateral*

Who is responsible for data processing and who can I contact?

Responsibility lies with

Unifer International GmbH

Strandweg 8, D-18107 Elmenhorst/ Lichtenhagen (Mecklenburg–Vorpommern)

Tel.: +49 1725405605

info@unifer.de

You can reach our internal Data Protection Officer under

Unifer International GmbH

Datenschutzbeauftragter

Strandweg 8, D-18107 Elmenhorst/ Lichtenhagen (Mecklenburg–Vorpommern)

Tel.: +49 1725405605

dataprotection@unifer.de

Which sources and which data do we use?

We process personal data which we receive from our clients, other concerned parties in connection with our business relationship or from employees in connection with labor relations. Moreover, we process personal data legitimately obtained from publicly accessible sources (such as debtors' lists, land registers, registers of commercial establishments and associations, press, Internet) or which have been legitimately transmitted to us from other companies or third parties to the extent necessary for rendering our services.

Relevant personal data are personal details (name, address and other contact data, date and place of birth, nationality, photo), legitimization data (such as data from ID cards, passports) and also authentication data (such as a specimen signature).

In addition, these may also be contract data (such as a payment order), data resulting from the performance of our contractual obligations (such as turnover data in payment transactions), information about your financial status (such as data on credit standing, data on scoring or rating, origin of assets), data relevant for loans (such as revenues and expenditures), advertising and sales data (including advertising scores), documentation data (such as a protocol on consultations) and other data comparable with the above-mentioned categories.

What is the purpose of processing your data (purpose of personal data processing) and on which legal basis does this take place?

We process personal data in accordance with the provisions of the EU General Data Protection Regulation (GDPR) and the German Federal Law on Data Protection (BDSG)

- a. in order to comply with contractual obligations (Art. 6 (1 b) GDPR)

Data are processed for the purpose of selling goods and providing services in connection with the performance of our agreements with our clients or for performing pre-contractual measures as a result of queries.

b. within the scope of the balancing of interests (Art. 6 (1 f) GDPR)

To the extent necessary, we will process your data beyond the scope of the actual performance of the contract so as to protect justified interests of our own and of third parties. Examples:

- consultation of and exchange of data with export credit agencies, insurance companies, banks, rating agencies so as to determine credit standing or default risks in connection with sales or services contracts or their conclusion,
- analysis and optimization of processes for needs analysis for the purpose of the direct approach of clients,
- advertising or market and opinion research unless you have objected to the use of your data,
- lodging legal claims and defense in case of legal disputes,
- ensuring IT security and the IT operation of the company,
- video surveillance to exercise domiciliary rights,
- measures for securing buildings and systems (such as admission control),
- measures to protect our domiciliary right,
- measures for business management and advanced development of services and products,
- risk management within Unifer International GmbH and its subsidiaries,
- salary and social security cover for employees.

c. as a result of your consent (Art. 6 (1 a) GDPR)

To the extent you have consented to the processing of personal data by us for certain purposes such processing is legitimate on the basis of your consent. Consent once given may be revoked at any time. This also applies to the revocation of declarations of consent given to us before the effective date of the GDPR, i.e. before 25 May 2018. Revocation of consent has an effect only for the future and does not affect the legitimacy of the data processed until revocation.

d. on the basis of statutory regulations (Art. 6 (1 c) GDPR) or in the public interest (Art. 6 (1 e) GDPR)

We only process your data based on Art. 6 para. 1 f) of the General Data Protection Regulation for the protection of legitimate interests if there is neither consent nor any other legal basis for data processing apparent and only if the further requirements of Art. 6 para. 1 f) of the General Data Protection Regulation are satisfied, i.e., if our interests in data processing or the interests of a third party in a particular case outweigh your interests, or fundamental rights and freedoms. Data will be stored for as long as the legitimate interest continues to exist.

Who will receive my data?

We can transfer your data to third parties (e.g., to export credit agencies, insurance companies, banks, rating agencies, airlines or other transport companies, hotels, public authorities and institutions etc.) only if and to the extent that we are authorized to do so under data protection law (e.g., in the aforementioned cases).

We may also forward your data to third-party service providers (e.g., IT service providers, companies that destroy or archive data, cloud service providers) who assist us with data processing on an outsourced basis and are required to strictly comply with our instructions.

We will neither sell your personal data to third parties nor otherwise market your data.

Will the data be transferred to a third country or an international organization?

Data processing generally will not take place outside the EU and the EEA. If such a data transfer should nevertheless be necessary in a particular case, it will be made exclusively on the basis of the EU standard contractual clauses or to countries for which there is an EU decision on the adequacy of data protection as well as on an outsourced basis.

Nevertheless, we can transfer your data outside of the EU and the EEA to our subsidiaries in Ukraine, the Russian Federation, Republic of Moldova, and Republic of Kazakhstan.

For how long will my data be stored?

Employees' personal data will be stored until the end of the employment contract (and related legal obligations).

We process and store your personal data as long as this is required to meet our contractual and statutory obligations. In this respect, please keep in mind that our business relationship is a continuing obligation designed to last for years. If the data are no longer required for the performance of contractual or statutory obligations, these will be erased on a regular basis unless – temporary – further processing is necessary for the following purposes:

- Compliance with obligations of retention under commercial or tax law which, for example, may result from the German Commercial Code (HGB), the German Fiscal Code (AO), the German Law on Money-Laundering (GwG) and the German Law on Trading in Securities (WpHG). As a rule, the time limit specified there for retention or documentation is 2 to 10 years.

What are my rights with regard to data protection?

Every data subject has the right of access pursuant to Article 15 GDPR, the right to rectification pursuant to Article 16 GDPR, the right to erasure pursuant to Article 17 GDPR, the right to restriction of processing pursuant to Article 18 GDPR, the right to object pursuant to Article 21 GDPR and the right to data portability pursuant to Article 20 GDPR.

As far as the right to obtain information and the right to erasure are concerned, the restrictions pursuant to Secs. 34 and 35 BDSG are applicable. Moreover, there is a right to appeal to a competent data protection supervisory authority (Article 77 GDPR in conjunction with Sec. 19 BDSG).

Your consent to the processing of personal data granted to us may be revoked at any time by informing us accordingly. This also applies for the revocation of declarations of consent given to us before the effective date of the GDPR, i.e. before 25 May 2018. Please keep in mind that such revocation will be effective only for the future with no impact on processing carried out before the date of revocation.

Am I obliged to provide data?

Within the scope of our business relationship, you are obliged to provide those personal data which are required for commencing, executing and terminating a business relationship and for compliance with the associated contractual obligations or the collection of which is imposed upon us by law. Without these data, we will generally not be able to enter into agreements with you, to perform under such an agreement or to terminate it.

If you should fail to provide the necessary information and documents, we cannot enter into the desired business relationship or to continue with such a relationship.

To what extent will decision-making be automated?

We do not use automated decision-making processes pursuant to Article 22 GDPR for establishing and performing a business relationship.

Information about your right to object pursuant to Article 21 GDPR

Right to object based on individual cases

You have the right to object, on grounds relating to your particular situation, at any time to the processing of personal data concerning you which is based on point (e) of Article 6 (1) (data-processing in the public interest) and point (f) of Article 6 GDPR (data-processing on the basis of the balancing of interests); this also applies for profiling as defined in Article 4 point 4 GDPR.

If you do object, we will no longer process your personal data unless we have compelling justified reasons for such processing which take precedence over your interests, rights and freedom or, alternatively, such processing serves to assert, exercise or defend legal claims.

Right to object to processing data for the purpose of direct marketing



In individual cases, we will process your personal data for the purpose of direct marketing. You have the right to object at any time against the processing of your personal data for the purposes of such marketing; this also applies for profiling to the extent it is connected to such direct marketing.

If you do object to processing for the purposes of direct marketing, we will refrain from using your personal data for such purposes henceforth.

Recipient of an objection

Such objection may be submitted informally under the heading "objection" indicating your name, your address and your date of birth and should be addressed to:

Unifer International GmbH

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