

Information obligation according to the GDPR for applicants, employees, customers, business partners, trade fair visitors and company visitors

We would like to provide detailed information on how our company processes your personal data and your data protection entitlements and rights pursuant to art. 12 et seq. of the General Data Protection Regulation (GDPR).

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

Under data protection law, the data controller is:

Wilkhahn
Wilkening+Hahne GmbH+Co.KG
Fritz-Hahne-Strasse 8
D-31848 Bad Münder
Phone: +49 5042 999 0
E-mail: privacy.contact@wilkhahn.com

Our data protection officer is:

Jörg Hagen
Jhcon Datenschutzberatung
Königstrasse 50 a
D-30175 Hannover
E-mail: hagen@jhcon.de

2. Which data are processed and where does the data come from?

We process personal data that we receive from our customers, suppliers and interested parties while conducting business or initiating contracts or that we have generated ourselves in these contexts. Should it prove necessary in order to conduct business, we process personal data that has been sent to us legitimately by other third parties (e.g. a credit rating agency). We also process data that we receive from you following your consent or when you apply for a job with or are employed by us.

We process the following categories of personal data:

Master and contact data:

- **Customers:** Customer number, surname, first name, communication and contact details (e.g. address, phone, fax, e-mail), corporate data (e.g. the company's name, legal form, legal representative, tax number, business premises, contacts), bank and credit-rating details (e.g. bank info, IBAN, BIC), data when initiating or processing contracts (e.g. contract data, correspondence, planning data, consulting documents, payment data and terms, conditions, terms and conditions as well as logistics and delivery data), statistics and other data comparable with the categories stated.
- **Business partners:** Supplier number or similar, surname, first name, communication and contact details (e.g. address, phone, fax, e-mail), corporate data (e.g. the company's name, legal form, legal representative, tax number, business premises, contacts), bank and credit-rating details (e.g. bank info, IBAN, BIC), data when initiating or processing contracts (e.g. contract data, correspondence, planning data, consulting documents, payment data and terms, conditions, terms and conditions as well as logistics and delivery data), statistics and other data comparable with the categories stated.
- **Applicants/employees:** Surname, first name, communication and contact data (e.g. address, phone, fax, e-mail), date of birth, payment and credit-rating data (e.g. bank, IBAN, BIC) data from CVs, references, religious affiliation and photos.

- **Trade show visitors:** Surname, first name, communication and contact data (e.g. address, phone, fax, e-mail).
- **Visitors:** Surname, first name, communication and contact data (e.g. address, phone, fax, e-mail), signature.

Furthermore, we might also process the following other personal data:

- Information from your electronic communications with us (e.g. an IP address),
- Data that we generate ourselves from your master or contact data as well as other data (e.g. from customer requirement and customer potential analyses),
- Your consent to receive newsletters for example,
- Photos at events.

3. What do we process your data for – purpose of the processing – and on what legal basis is this carried out?

If we receive personal data from you, we only ever process it for the purposes for which we have received and captured it.

Such purposes are in particular:

- **For manufacturing and selling furniture.** We use your personal data in order to advise you, to receive and process orders, to make payments or communicate with you about quotes, orders or services.
- **For employing and recruiting people.** We process personal data if you are one of our employees or as part of a recruitment procedure. We also process data which is required to operate our company safely and in line with customary business practice and which is necessary in our relationships with our suppliers and customers.
- **Compliance with legal provisions.** In certain cases, legal provisions compel us to capture and process your personal data.
- **Communication.** We use your personal data to communicate with you via various channels (e.g. by phone, e-mail, post) about issues related to our business.
- **Fraud prevention and credit risks.** In order to protect the safety of Wilkhahn and third parties, we process personal data to prevent or disclose fraud and improprieties.
- **Purposes for which we request consent.** In certain cases, we will ask you to consent to processing of your personal data for a particular purpose, which we will inform you about in each specific case. If you give consent to the processing of your personal data for a specific purpose, you can, at any time, **revoke** consent to your personal data being processed in the future (see point 9).

Data processing for other purposes is only allowed if the requirements pursuant to art. 6 section 4 of the GDPR are met. We will, of course, comply with any duties to provide information pursuant to art. 13 section 3, GDPR and art. 14, section 4 GDPR.

Legal basis for processing

We process your personal data in compliance with the applicable statutory data protection requirements. The legal basis for processing personal data is always, insofar as no other specific legal specifications apply, art. 6 GDPR. Processing is lawful if at least one of the following conditions is met:

- **Consent (art. 6, section 1 a GDPR)**
Processing personal data is lawful when consent to the processing for specific purposes and to the agreed extent is given. You may, at any time, **revoke** consent to your personal data being processed in the future (see point 9).
- **To fulfil contractual obligations or to carry out pre-contractual measures (art. 6 section 1 b GDPR) with natural persons**
We process personal data in order to comply with our contractual duties to provide products and services for our customers and/or to carry out requested pre-contractual measures. Data processing purposes primarily arise depending on the products and services offered in each

case. Further details on data processing purposes can be found in the relevant contracts and terms and conditions.

- **Processing in the context of employment (art. 88 GDPR and local legislation in each country)**

Your personal data is chiefly processed for human resources management purposes and for the performance of the employment contract (art. 6, section 1, lit. b GDPR).

- **To comply with legal obligations (art. 6, section 1 c GDPR)**

We have to comply with various legal obligations (e.g. commercial and fiscal retention periods as stated in the commercial code). Fulfilling monitoring and reporting obligations regarding customs and tax, as well as the assessment and management of risks within the company are some of the purposes for which we need to process data.

- **For the purposes of legitimate interests (art. 6 section 1 f GDPR)**

If necessary, we process your personal above and beyond actual fulfilment of the contract in order to protect our or third parties' legitimate interests except where such interests are overridden by the data subjects' rights.

Our legitimate interests are, for example:

- Revising and improving processes concerned with general business management and developing our services and production process
- Evaluating sales data
- Asserting legal entitlements and providing a defence in legal disputes
- Building and machinery security measures (e.g. access controls)
- Advertising and marketing
- Ensuring that Wilkhahn's IT system is operational and secure
- Exchanging data with credit rating agencies to establish credit and/or default risks
- Sending non-commercial information and press releases

If we process data after **weighing up interests**, as a data subject you have the right, while taking into account the specifications in art. 21 GDPR, **to object to** processing of the personal data (see point 9).

4. Who receives your data?

Wilkhahn departments have access to the personal data that they require for the data processing purposes pursued by Wilkhahn and in order to meet contractual and legal obligations. Wilkhahn also appoints carefully selected service providers who are based within the EU and commissioned in accordance with data protection regulations to carry out some of the above-mentioned processes and services.

We are only permitted to transmit data to further recipients if you have authorised us to do so. In these cases, some of the recipients of personal data can be:

- **Public bodies and organisations** (e.g. customs offices, tax authorities, social security organisations) where a statutory or official obligation exists
- **Other companies or comparable organisations** to which we transfer personal data in order to carry out the business relationship with you (e.g. banks, credit rating agencies, forwarding agents, service providers, unless they are processors of orders and have a legitimate interest in such transfer)

Other organisations can also be data recipients if you have provided your consent for your data to be sent to them.

5. Is your data forwarded to a non-EU country or international organisations?

We do not intend to forward your data to a non-EU country or international organisations.

6. Data processing location

We only process your personal data in data centres located in the European Union.

7. How long do we store your data for?

We process your personal data as long as necessary for the purpose concerned. If statutory retention obligations exist, the personal data is stored for the duration of the retention obligation in order to meet the following purposes:

- **To comply with statutory commercial and fiscal retention obligations**
- **To preserve evidence as far as the statute of limitations allows**

Once the duty to retain the data has expired, we check whether we still need to keep it for processing purposes. The data is deleted if keeping it is no longer necessary.

You may request information about the personal data that we store about you, and if we do not need to keep the data, to request that it be deleted or that processing is restricted (see point 9).

8. What data protection rights do you have?

You have the right of **access** under article 15 GDPR, the right to **rectification** under article 16 GDPR, the right to **erasure** under article 17 GDPR, the right to **restriction of processing** under article 18 GDPR and the right to **data portability** under article 20 GDPR. Furthermore, you have the **right to lodge a complaint** with a data protection supervisory authority (article 77 GDPR) in your country.

Click on the following list to obtain a list of data protection officers and their contact information:

https://edpb.europa.eu/about-edpb/board/members_en

You may **revoke** consent to your personal data being processed in the future at any time (see point 9). Data processing carried out before consent was withdrawn is still lawful. This also applies to consent withdrawals issued to us before the GDPR came into force, i.e. before 25 May 2018.

9. What rights to object do you have?

Information on your right to object pursuant to art. 21 GDPR

Right to object based on individual cases

For reasons associated with your own personal circumstances, you have, at any time, the right to object to processing of your personal data carried out in compliance with article 6, section 1 e GDPR (data processing in the public interest) and article 6, section 1 f GDPR (data processing for the purposes of legitimate interests); this also applies to profiling based on personal data pursuant to article 4, no. 4, GDPR.

If you file an objection, we will no longer process your personal data unless we can furnish compelling legitimate grounds for processing such data, which take precedence over your interests, rights and freedoms or if the purpose of processing the data is to assert, exercise or defend legal entitlements.

Right to object to data processing for direct marketing purposes

In some cases, we process your personal data in order to send direct marketing. You have the right, at any time, to object to processing of your personal data for these types of marketing purposes; this also applies to profiling, insofar as it is associated with this type of direct marketing. If you object to processing of your personal data for direct marketing purposes, we will no longer process your personal data for such purposes.

Your **objection** can be made in any form and should, if possible, be addressed to:

By post	E-mail
Wilkhahn Privacy / Withdraw Fritz-Hahne-Strasse 8 D-31848 Bad Münden	privacy.withdraw@wilkhahn.com

If you do not **request information** in writing or do not provide adequate means of identifying yourself, we hope you can appreciate that we then might require you to provide evidence that you are the person you claim to be.

A request for information can be made in any form and addressed, if possible, to:

By post	E-mail
Wilkhahn Privacy / Access Fritz-Hahne-Strasse 8 D-31848 Bad Münden	privacy.access@wilkhahn.com

10. Are you obliged to provide data?

As part of the business relationship with us, you only have to provide personal data which is required to establish, execute and terminate a business relationship and to meet the associated contractual obligations or if we are obligated by law to capture such personal data. Without this data, we will not usually be able to conclude, execute or terminate a contract with you.

11. Data security and data protection, e-mail communication

Technical and organisational steps are taken to protect your personal data when it is captured, stored and processed so that third parties have no access to it. If e-mails are not encrypted, we cannot guarantee full data security when the data is transmitted to our IT systems. Therefore, where there is a significant need for confidentiality exists, we recommend encrypted communication or sending information by post.

12. Current state and changes

The development of our website, offers, or new legal or official guidelines may make it necessary to modify this information statement. You can view and print the current information statement at any time on our website at <https://www.wilkhahn.com/en/ds>