

## General information regarding data security at the TROWIS GmbH

### 1. Name and contact data of the responsible person

Company: TROWIS GmbH  
Address: Annaberger Straße 240,  
09125 Chemnitz  
Germany  
Phone: +49 (0) 371 5437630  
E mail: [info@trowis.de](mailto:info@trowis.de)

### 2. Source of the personal data

We process the personal data we have collected from you or obtained from our or your contractual partners or potential buyers within the scope of our business relationship. Furthermore we process – if this is necessary to provide our services – personal data which we rightfully gain from sources with public access (such as the Commercial Register) or data to which we are entitled that is transmitted to us by miscellaneous third parties (such as information/ disclosure).

### 3. Categories of personal data that are processed

Relevant personal data categories may include, specifically, master and contact data (such as name, date of birth, mailing address, phone number, E mail), order and contractual data (such as image documentation, account data), and information about your financial status (such as data on creditworthiness), as well as other data like that in these categories.

### 4. Purposes of data processing

Data are processed for purposes of contractual performance, refinement of products and services, direct marketing, control, guidance and optimization of business processes, asserting legal claims and advocacy in legal disputes, as well as other purposes that are similar to/ commensurable with the categories named above.

### 5. Receivers and categories of personal data

Contractual partners, service providers (such as banks, insurance companies, logistic firms, printing companies, suppliers, IT service providers), consultants (such as tax consultants, lawyers), governmental authorities and institutions that receive data due to legal provisions, such as social insurers and financial authorities, as well as other receivers that are similar to/ commensurable with the categories mentioned.

### 6. Legal foundation for data processing

Processing of data is based on/ justified by Art. 6 Par. 1 a to c and f GDPR: prior approval (Art. 6 Par. 1 a GDPR); performance of contractual obligations or performance of pre-contractual actions (Art. 6 Par. 1 b GDPR); fulfillment of a legal obligation (Art. 6 Par. 1 c GDPR); safeguarding vital interests of the responsible person or third parties (Art. 6 Par. 1 f GDPR), such as safeguarding IT safety and IT operation, advertising and marketing, assertion of legal claims and advocacy in legal disputes, guaranteeing and safeguarding in-house property rights, determination of creditworthiness and non-payment risks.

### 7. Standard periods for deletion of data

The criteria according to which the period of storage is defined are determined according to the end of the purpose and subsequent legal retention period. If the data are no longer required to perform contractual or legal obligations, they will be regularly deleted unless their – limited in time and possibly content– further processing is required for the purposes mentioned below:

- Performance of retention periods in terms of commercial and tax laws. The periods foreseen there for retention or documentation are from two to ten years.
- Obtaining evidence in the context of the provisions of limitation. These periods of limitation can be up to 30 years, while the regular period of limitation is three years according to §§ 195 ff. of the German Civil Code (German abbrev.: BGB).

### 8. Obligation to provide data

Within the scope of our business relationship, you must make available personal data that are necessary for the commencement, performance, and termination of a business relationship, and for the fulfillment of any contractual obligations resulting therefrom; or to whose collection we are legally obliged. Without this data, as a rule, we will not be able to conclude a contract with you, or to perform and complete its provisions.

### 9. Interested parties' rights

Regarding your own personal data, we affirm that you have the following rights: right to information, right to adjustment/ correction or deletion, right to limitation of processing, right to decline data processing, right to data transferability.

You are also entitled to file a complaint with a data protection supervisory authority about our processing of your personal data by us.

If you have declared prior approval of the processing of your data you are entitled to revoke this approval at any time. This revocation will affect the admissibility of processing your personal data once you have indicated the revocation.

Provided that we have processed your personal data to safeguard justified interests according to Art. 6 Par. 1 f GDPR, then you are entitled to file an objection to the processing of your personal data according to Art. 21 GDPR, insofar as there are reasons resulting from your specific situation. Naturally, you may revoke permission to process your personal data for purposes of marketing and data analysis at any time.

If you want to make use of the right to revoke, you should email us at [info@trowis.de](mailto:info@trowis.de).

Automated decision-making incl. profiling will not be done nor will personal data be transmitted to third countries or international organizations.

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