

# Data Protection Information for Customers, Suppliers, Service Providers, Commercial Agents and Visitors to Our Sites

## Table of Content

1. General
2. Name and Contact Details of the Controller
3. Data Protection Officer
4. Processing of your Personal Data
5. Storage Periods
6. Recipients of your Personal Data
7. Transfer of your Personal Data to Third Countries
8. Note on Consents
9. Your Rights as a Data Subject
10. No Automated Individual Decision-Making
11. Definitions
12. Further Data Protection Information

### 1. General

In the following we would like to inform you how your personal data is processed by the companies of the Von Roll Group and what your rights are in accordance with the EU General Data Protection Regulation (GDPR).

### 2. Names and Contact Details of the Controllers

The company of the Von Roll Group with which you have a business relationship or whose site you visit is the responsible controller in terms of data protection. You can identify the Von Roll Group company responsible for you, for example, on the basis of the information in quotations, order forms, contracts, delivery notes and other documents as well as correspondence with you.

An overview of the Von Roll Group companies that may be active within the scope of the GDPR, including names and contact details, can be found in Appendix 1.

If you have any questions regarding data protection or in connection with the exercise of your rights, you can also contact any Von Roll Group company at any time via [dataprotection@vonroll.com](mailto:dataprotection@vonroll.com)

### 3. Data Protection Officer

The following companies of the Von Roll Group have appointed a data protection officer. You can

reach the data protection officers at the contact details provided below.

- **Von Roll Deutschland GmbH**

Contact details of the data protection officer:  
Von Roll Germany GmbH  
Data Protection Officer  
Theodor-Sachs-Str. 1  
86199 Augsburg / Germany  
E-mail: dsb@vonroll.com

#### **4. Processing of Your Personal Data**

In connection with a business relationship, we regularly process the following categories of personal data:

- Master data (e.g. name, company name, function, business address)
- Communication data (e.g. professional telephone numbers, professional e-mail addresses, fax numbers)
- Information about the business relationship (e.g. order history, dates, sales)
- Delivery addresses (if applicable)
- Billing addresses (if applicable)
- Bank data (if applicable)
- Credit check data

We process this data:

- for the purpose of initiating the business relationship and concluding, implementing and terminating contracts on the legal basis of Art. 6 para. 1 sentence 1 lit. b GDPR (performance of a contract or steps prior to entering into a contract) and Art. 6 para. 1 sentence 1 lit. f GDPR (safeguarding legitimate interests). Insofar as our legitimate interest in processing is to be taken into account pursuant to Art. 6 para. 1 sentence 1 lit. f GDPR, this lies in ensuring an orderly course of business and the exercise of a business enterprise.
- for the purpose of carrying out analyses and evaluations (including creditworthiness checks) and, if necessary, for direct advertising on the legal basis of Art. 6 para. 1 sentence 1 lit. f GDPR (safeguarding legitimate interests). Insofar as our legitimate interest in processing is to be taken into account pursuant to Art. 6 para. 1 sentence 1 lit. f GDPR, this lies in ensuring an orderly course of business and the exercise of a business enterprise.
- for the purpose of fulfilling legal storage obligations on the legal basis of Art. 6 para. 1 sentence 1 lit. c GDPR (fulfilment of a legal obligation).

We regularly collect personal data in connection with the performance of a business relationship directly from the data subjects. However, it is also possible that we do not collect master or communication data directly from you, but from the following sources:

- Company you work for
- Profiles on job-related social networks (e.g. LinkedIn, Xing)
- Business cards

During a visit to our sites, visitors are entered into a visitor book or visitor management system. In this context, master data and time-space data are processed for the purpose of exercising our

householder's rights. The legal basis for this is Art. 6 para. 1 sentence 1 lit. f GDPR (safeguarding legitimate interests). Insofar as our legitimate interest in processing is to be taken into account pursuant to Art. 6 para. 1 sentence 1 lit. f GDPR, this lies in the guarantee of security at our sites.

At some of our sites, video surveillance takes place in clearly marked and demarcated areas. In this context, image data and time-space data of persons located in these areas are processed. We process this data for the purpose of exercising our householder's rights, asserting claims and prosecuting criminal offences. The legal basis for this is Art. 6 para. 1 sentence 1 lit. f GDPR (safeguarding legitimate interests). Insofar as our legitimate interest in processing is to be taken into account pursuant to Art. 6 para. 1 sentence 1 lit. f GDPR, this lies in the guarantee of security at our sites.

In principle, you are not legally or contractually obliged to provide your personal data. However, the provision of your personal data is regularly necessary for the implementation of the business relationship. If you do not provide us with your personal data, it is regularly not possible to carry out the business relationship.

## **5. Storage Periods**

In principle, we delete personal data when the lawful purpose intended by their processing has been achieved, unless we are entitled or obliged to further processing. Such an obligation can arise, for example, from tax and/or commercial law retention obligations or the safeguarding of legitimate interests.

We regularly store data subject to tax and/or commercial law retention obligations for up to ten years. In individual cases, due to country-specific special regulations, a different storage period may apply.

In the case of personal data held by the general administration, the need for further storage will be examined after four years from the end of each calendar year. If a necessity does not exist, the data will be deleted.

Entries in visitor books or visitor management systems will be deleted after three months at the latest.

Video recordings will be deleted after ten days at the latest.

## **6. Recipients of Your Personal Data**

We may transfer your personal data to the following categories of recipients

- Other Von Roll companies
- Service providers (e.g. IT service providers, freight forwarders, waste disposal companies)
- Consultants (e.g. lawyers, tax consultants)
- Authorities (e.g. tax authorities)
- Insurer (e.g. trade credit insurer)
- Credit agencies

## **7. Transfer of Your Personal Data to Third Countries**

We may transfer your personal data to recipients based in countries outside the European Union (EU) or the European Economic Area (EEA). We will do this, for example, in connection with the execution of an order. If we transfer personal data to recipients in such a third country, this will only take place if the third country has been confirmed by the EU Commission to have an adequate level of data protection or if other appropriate data protection guarantees (e.g. binding internal company data

protection rules, EU standard contract clauses or - in the case of recipients in the USA - compliance with the principles of the so-called "EU-US Privacy Shield") are in place. You can request a copy of these data protection guarantees using the contact details mentioned in point 2.

## **8. Note on Consents**

If you have given your consent to the processing of your personal data, you can withdraw it at any time. The withdrawal shall not affect the lawfulness of the processing carried out on the basis of the consent up to the withdrawal.

## **9. Your Rights as a Data Subject**

Articles 15 to 21 of the GDPR provide for the following rights for data subjects:

- Access right
- Right to rectification
- Right to erasure ("right to be forgotten")
- Right to restriction of processing
- Right to data portability
- Right to object

You have the right, for reasons arising from your particular situation, to object at any time to the processing of your personal data on the basis of Art. 6 para. 1 sentence 1 lit. e GDPR (data processing in the public interest) and of Art. 6 para. 1 sentence 1 lit. f GDPR (safeguarding legitimate interests); this also applies to profiling based on this provision. If you file an objection, your personal data will no longer be processed unless we can prove compelling reasons for processing worthy of protection which outweigh your interests, rights and freedoms, or the processing serves the assertion, exercise or defense of legal claims.

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the GDPR.

Further information on your rights as a data subject is also available on the European Commission's website at [https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens_en).

## **10. No Automated Individual Decision-Making**

In connection with the business relationship, there will be no automated individual decision-making, including profiling, which produces legal effects concerning you or similarly significantly affects you.

## **11. Definitions**

The terms used in these data protection information are based on the definitions in Art. 4 GDPR. Having said that, the following terms must be understood as follows in these data protection information (not exhaustively):

- **'personal data'** means any information relating to an identified or identifiable natural person (hereinafter "**data subject**"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that

natural person;

- **'processing'** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- **'profiling'** means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements;
- **'controller'** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
- **'processor'** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
- **'recipient'** means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;
- **'third party'** means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data;
- **'consent'** of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

## 12. Further Data Protection Information on the Website

Further information on the processing of your personal data when using our website can be found at <https://www.vonrollgroup.com/en/legal-information/>.

**Appendix 1**

<b>Country</b>	<b>Company</b>	<b>Address</b>
CH	Von Roll Holding AG	Von Roll Holding AG Passwangstrasse 20 CH-4226 Breitenbach
CH	Von Roll Management AG	Von Roll Management AG Passwangstrasse 20 CH-4226 Breitenbach
CH	Von Roll Finance AG	Von Roll Finance AG Passwangstrasse 20 CH-4226 Breitenbach
CH	Von Roll Insulation & Composites Holding AG	Von Roll Insulation & Composites Holding AG Passwangstrasse 20 CH-4226 Breitenbach
CH	Von Roll Umwelttechnik Holding AG	Von Roll Umwelttechnik Holding AG Passwangstrasse 20 CH-4226 Breitenbach
CH	Von Roll Schweiz AG	Von Roll Schweiz AG Passwangstrasse 20 CH-4226 Breitenbach
CH	Pensionskasse SIB	Pensionskasse SIB c/o Von Roll Schweiz AG Passwangstrasse 20 CH-4226 Breitenbach
CH	Personalfürsorgestiftung der Von Roll Schweiz AG	Personalfürsorgestiftung der Von Roll Schweiz AG c/o Von Roll Schweiz AG Passwangstrasse 20 CH-4226 Breitenbach
CH	Jubiläumsstiftung der Von Roll Holding AG	Jubiläumsstiftung der Von Roll Holding AG c/o Von Roll Insulation & Composites Holding AG Passwangstrasse 20 CH-4226 Breitenbach
D	Von Roll Deutschland Holding GmbH	Von Roll Deutschland Holding GmbH Theodor-Sachs-Straße 1

		<b>D-86199 Augsburg</b>
<b>D</b>	<b>Von Roll Deutschland GmbH</b>	<b>Von Roll Deutschland GmbH Theodor-Sachs-Straße 1 D-86199 Augsburg</b>
<b>D</b>	<b>Von Roll Automotive GmbH</b>	<b>Von Roll Automotive GmbH Theodor-Sachs-Straße 1 D-86199 Augsburg</b>
<b>D</b>	<b>Von Roll REACH GmbH</b>	<b>Von Roll REACH GmbH Theodor-Sachs-Strasse 1 D-86199 Augsburg</b>
<b>D</b>	<b>Von Roll BHU Umwelttechnik GmbH</b>	<b>Von Roll BHU Umwelttechnik GmbH Esslinger Strasse 7 D-70771 Leinfelden-Echterdingen</b>
<b>F</b>	<b>Von Roll France SA</b>	<b>Von Roll France SA 27, Faubourg de Belfort F-90100 Delle</b>
<b>F</b>	Von Roll France SA	Branch:  Von Roll France SA Etablissements Fils de Bobinage 48, Faubourg de Belfort F-90100 Delle
<b>F</b>	Von Roll France SA	Branch:  Von Roll France SA Etablissements Samica 9, Avenue Charpentier F-90300 Valdoie
<b>F</b>	Von Roll France SA	Branch:  Von Roll France SA Etablissements Résines 145, Rue de la République BP128 F-69883 Meyzieu
<b>F</b>	<b>Von Roll Isola France SA</b>	<b>Von Roll Isola France SA 27, Faubourg de Belfort F-90100 Delle</b>
<b>IT</b>	<b>Albesiano Sisa Vernici S.r.l.</b>	<b>Albesiano Sisa Vernici S.r.l. Via Rigolfo 73 – Zona Vadò</b>

		<b>IT-10028 Trofarello (TO)</b>
<b>GB</b>	<b>Von Roll UK Ltd.</b>	<b>Von Roll UK Ltd. Wharfedale Road Euroway Estate Bradford GB-West Yorkshire BD4 6SG</b>
<b>RUS</b>	<b>OOO Von Roll</b>	<b>OOO Von Roll Ulitsa Sokolnicheskiy Val 1A RUS-Moscow 107113</b>
<b>USA</b>	<b>Von Roll USA Holding, Inc.</b>	<b>Von Roll USA Holding, Inc. 200 Von Roll Drive Schenectady, NY 12306 USA</b>
<b>USA</b>	<b>Von Roll USA, Inc.</b>	<b>Von Roll USA, Inc. 200 Von Roll Drive Schenectady, NY 12306 USA</b>
USA	Von Roll USA, Inc.	Branch: Von Roll USA, Inc. 115 River Street New Haven, CT 06513 USA
USA	Von Roll USA, Inc.	Branch: Von Roll USA, Inc. 4853 West 130th Street Cleveland, OH 44135 USA
<b>USA</b>	<b>John C. Dolph Company</b>	<b>John C. Dolph Company 200 Von Roll Drive Schenectady, NY 12306 USA</b>
<b>BR</b>	<b>Von Roll do Brasil Ltda.</b>	<b>Avenida Parque Central s/n – Distrito Industrial – Maracanaú – CE CEP: 61939-140 Brazil</b>
BR	Von Roll do Brasil Ltda.	Branch: Estrada BR 427 s/n KM 3,5 – Distrito Industrial –



		Currais Novos – RN CEP: 59380-000 Brazil
BR	Von Roll do Brasil Ltda.	Branch:  Rua Vaticano, 179 – Jd. Fontana Cotia – SP CEP: 06713-040 Brazil
SG	<b>Von Roll Asia Pte Ltd.</b>	<b>Von Roll Asia Pte Ltd. 6, Serangoon North Avenue 5, #03-01, Singapore 554910</b>
PRC	Von Roll Hong Kong Holding Ltd.	Von Roll Hong Kong Holding Ltd. Suite 2006, 20th Floor, 340 Queen's Road Central, Hong Kong
PRC	Von Roll Shanghai Co., Ltd.	Von Roll Shanghai Co., Ltd. Building C, No 1235, Min Qiang Road, Songjiang District Shanghai 201612 P.R. China
PRC	Von Roll Trading (Shanghai) Co., Ltd.	Von Roll Trading (Shanghai) Co., Ltd. Room 470, Building 2, No 458, Fute Road North, Pilot Free Trade Zone, Shanghai 200131 P.R. China
PRC	New Jadwson Electrical Material (Shenzhen) Co., Ltd.	New Jadwson Electrical Material (Shenzhen) Co., Ltd. Shang Henglang Village Longhua Township Baoan District Shenzhen P.R. China
IND	Pearl Insulations Pvt. Ltd.	Pearl Insulations Pvt. Ltd. 15/1/2, 20/1B, Kempalinganahalli, NH-48 Kunigal Road, Nelamangala, Bangalore 562 123, India

**Bold type** = Principal place of business