Data protection information for business partners of Laverana GmbH & Co. KG

Dear Ladies and Gentlemen,

On May 25, 2018, the EU General Data Protection Regulation (GDPR) entered into force. The GDPR - as a cross-border European regulation - protects the fundamental rights and freedoms of natural persons and in particular their right to protection of personal data. The aim of the GDPR is to ensure a uniform data protection standard in all member states of the European Union, to create greater legal certainty and to strengthen the rights of data subjects. The protection of your personal data has the highest priority at Laverana GmbH & Co KG. The careful handling of personal data is therefore a matter of course for us**.**

With this data protection notice, we would like to inform you about how the personal information collected by Laverana GmbH & Co. KG is used and how you can change the information we have stored about you or have it deleted or blocked. In order to be able to ensure smooth communication within the framework of the contractual relationship, it is necessary, depending on the individual case, to provide personal data and to process it accordingly for the performance of the contract.

We process the personal data of the business partner concerned only for the purpose of establishing, implementing and terminating a contract pursuant to Art. 6 (1) lit. b) DSGVO. In individual cases, processing of the personal data pursuant to Art. 6 (1) f) DSGVO may also come into consideration if the processing is necessary to protect the legitimate interests of Laverana GmbH & Co. KG. The legitimate interest lies in the performance of our business activities, in particular to respond to concerns of business partners about our products or the company (Art. 6 para. 1 lit. f) DSGVO). For this purpose, we store your personal data as long as it is necessary for the performance of the contract or for the implementation of pre-contractual measures. We delete or anonymize the data accruing in this context after storage is no longer necessary, or restrict processing if there are legal retention obligations.

The **following data protection information provides you with a detailed overview of the** processing of your personal data by Laverana GmbH & Co KG.

With kind regards

Thomas Haase

Managing Director of Laverana GmbH & Co. KG

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Privacy policy

I. To whom does this privacy notice apply?

In this data protection notice, we inform you about the collection and processing of your personal data when you contact us as a contact person for suppliers, service providers, commercial customers, contractual partners or interested parties (hereinafter: "business partners").

II. Name and address of the responsible person

The responsible body according to Art. 4 para. 7 EU General Data Protection Regulation (DSGVO) is the

Laverana GmbH & Co. KG (hereinafter referred to as "Laverana")

Personally liable partner/company

1. Claudia Haase

2. haase Verwaltungs GmbH, Wennigsen, Hanover Registry Court HRB 202460

Management: Thomas Haase

Registered office of the company:
Am Weingarten 4
30974 Wennigsen

Contact:
Tel: + 49 511 67541-100
Fax: + 49 5103 9391-8070
E-mail: info@lavera.de
Homepage: www.laverana.com

III. Name and address of the data protection officer

If you have any concerns or questions about data protection that go beyond the data protection information published here, please contact our data protection officer: You can reach the data protection officer at datenschutz@lavera.de or at our postal address with the addition of "the data protection officer".

IV. Principles for the processing of personal data

1. Lawfulness of processing and fairness

When processing personal data, the personal rights of the data subject must be respected. Personal data must be processed in a lawful manner, in a fair and comprehensible manner.

2. Earmarking

Personal data may only be processed for the purposes that were specified when the personal data were collected. Subsequent changes to the purposes are only possible to a very limited extent and always require a legal basis.

3. Transparency

The processing of personal data must always be transparent for the data subject. The data subject should be able to exercise his or her right to informational self-determination at any time and to assert the rights of the data subject. The principle of transparency is further strengthened, for example, by information requirements when personal data is collected and by the data subject's right to information.

4. Data economy and data minimization

Before any processing of personal data, an adequacy check must be carried out, which specifies whether and to what extent the processing of personal data is necessary for the intended purpose. In principle, the processing of personal data must be limited to what is necessary for the purpose of the processing.

5. Factually correct and up to date

Personal data must always be stored correctly, completely and - insofar as necessary - up to date.

V. Information about the processing of personal data

1. Scope of the processing of personal data

The protection of your personal data is our highest priority and is taken into account at all times in our business processes. We initially only collect, process and use the data that you provide to us as a contact person within the scope of our business relationship. This includes in particular the following data:

- Master data: Salutation, name, address, e-mail address, telephone numbers, function in the company, if applicable.

- If necessary, also other data related to the fulfillment of the business relationship, such as dealer number, address data, contract data, payment and accounting data, data from correspondence, data from other postal, electronic or telephone communication.

Laverana is committed to protecting the personal rights of everyone whose personal data is processed by us. As a matter of principle, we collect and use personal data of our business partners only insofar as this is necessary for the performance of a contract to which the data subject is a party or for the implementation of pre-contractual measures. The processing of personal data of our business partners is regularly only carried out with the consent of the business partner. The only exception to this is in cases where obtaining prior consent is not possible for factual reasons and the processing of the data is permitted by legal regulations.

2. Legal basis for the processing of personal data

According to the GDPR, we are obliged to inform you of the legal basis for the processing of your personal data. If we obtain the **consent of** the data subject for the processing operations of personal data, the legal basis for the processing is **Art. 6 (1) lit. a DSGVO**.

When processing personal data that is necessary for **the performance of a contract** to which the data subject is a party or for the implementation of pre-contractual measures, **Art. 6 para. 1 lit. b) DSGVO** serves as the legal basis.

If processing of personal data is necessary for **compliance with a legal obligation to** which Laverana is subject, **Article 6 (1) c)** serves as the legal basis for the processing.

Furthermore, the legal basis for the necessary processing of personal data to protect **vital interests of** the data subject or another natural person is **Article 6(1)(d)**.

If the processing is necessary to protect the **legitimate interests of Laverana** or a third party, unless the interests or fundamental rights and freedoms of the data subject which require the protection of personal data override these, **Article 6 (1) (f) is** defined as the legal basis for the processing.

3. Storage and deletion of personal data

We delete or anonymize the personal data of the data subject after the purpose of the storage no longer applies, i.e. the storage is no longer required, or restrict the processing if there are statutory retention obligations.

Furthermore, storage can only take place if this is provided for by the European or national legislator in Union regulations, laws or other regulations to which the responsible party is subject for compliance.

4. Recipients of personal data

Laverana only grants access to your personal data to those persons who need it for the purposes stated in this data protection notice. Your personal data will only be passed on to external recipients (third parties) if there is a legal basis in accordance with the DSGVO or if we have your express consent to do so. Third parties in this sense are not the companies of the Thomas Haase Group.

External recipients of your personal data may be:

a. **Processor:** A natural or legal person, authority, institution or other body that processes personal data on behalf of Laverana. These are usually service providers that Laverana uses for the provision of services, for example in the areas of IT infrastructure or for the maintenance of IT systems, but also in the area of sending newsletters or logistics.

b. **Public authorities:** Authorities or government institutions, such as courts or government agencies, to which we must transfer personal data for legally mandatory reasons.

c. **Private entities:** For example, insurance companies, tax advisors or auditors to whom data is transferred on the basis of consent or a legal basis pursuant to Art. 6 (1) DSGVO.

VI. Data processing about entrepreneurs or employees of companies

Our (pre-contractual) relationships with commercial customers, suppliers, service providers and interested parties aim to provide entrepreneurs or employees of companies with the best service around the products of the lavera brand. We want smooth communication with our business partners to be possible at all times. Therefore, we process personal data of entrepreneurs who have a (pre-) contractual relationship with us (if they are a natural person) or employees of your company for the purposes listed below.

For the processing of personal data that is necessary for the performance of a contract to which the data subject is a party, Art. 6 para.1 lit. b DSGVO serves as the legal basis. This also applies to processing operations that are necessary for the implementation of pre-contractual measures. The data will be deleted if they are no longer necessary to achieve the respective purpose. This is the case if there is no longer a contract with the business partner and we also no longer intend to conclude a contract with the business partner. Likewise, this may be the case if there is no longer a legitimate interest and we are also no longer obliged to keep documents in which personal data may be contained.

VII. Data processing for contract management and contract preparation purposes

We process your personal data for the purpose of contract management, i.e. so that we can provide the contractual services to our business partners, as well as for the purpose of corresponding contract reviews and contract preparations.

If the business partner is a natural person, Art. 6 para.1 lit. b DSGVO is the legal basis for the above-mentioned processing, namely for the performance of a contract or for the implementation of pre-contractual measures. Furthermore, we process personal data of employees of our business partners on the basis of our legitimate interest pursuant to Art. 6 para.1 lit. f DSGVO. The legitimate interest lies in the performance of our business activities as well as those of the business partner, for which, for example, contact with employees of the business partner is often essential in the context of contract processing. There is no conflicting interest of the respective data subject in this respect.

We delete the data accruing in this context after storage is no longer required, or restrict processing if there are statutory retention obligations. For example, accounting vouchers must be retained for a period of ten years and business letters for a period of six years in order to comply with the statutory retention obligations pursuant to Section 257 (1) No. 2 HGB and Section 147 AO.

VIII. Customer advisory service

We process the personal data of the business partner or its employees received in connection with a contract or an inquiry from an interested party as a contact person, if necessary also after the end of the contract or if no contract is concluded, for the purpose of customer consulting and in order to be able to propose suitable services in

the event of a renewed inquiry from the business partner, based on the previous conclusion of the contract or inquiries.

The legal basis is a legitimate interest according to Art. 6 para.1 f DSGVO. The legitimate interest lies in the performance of business activities. The data is only stored if we can assume that the respective business partner will conclude a further or first-time contract with us in the future, which is the case until the business partner in question declares that he will never conclude a contract with Laverana GmbH & Co. KG under any circumstances.

IX. Video surveillance

Laverana GmbH & Co. KG uses video surveillance at the sites of Laverana GmbH & Co. KG in compliance with the legal requirement. The use of video surveillance can be identified by a notice on video surveillance including a pictogram. The use of video surveillance is based on our legitimate interest (Art. 6 para. 1 lit. f) DSGVO). The processing purpose is the protection of customers, suppliers and employees as well as the protection of company property and the prevention of criminal acts. This also results in our legitimate interests in video surveillance.

X. Rights of the data subject

You have the following rights with respect to us regarding personal data concerning you:

- **Right to information:** You have the right to information about the data stored by us, in particular for what purpose the processing takes place and how long the data is stored (Article 15 DSGVO).
- **Right to rectification:** You have the right to request us to rectify the data concerning you without delay if it should be inaccurate (Article 16 DSGVO).
- **Right to erasure ("right to be forgotten"):** You have the right to request that we delete data relating to you. The prerequisite is that we no longer need your data for the purposes for which it was collected or otherwise processed, we have processed the data unlawfully or you should have legitimately objected to the use of the data, revoked your consent, or if there is a legal obligation to delete it (Article 17 DSGVO).
- **Right to restriction of processing:** You have the right to request restriction of the processing of your data. This right exists in particular for the duration of an audit if you have disputed the accuracy of the data concerning you, as well as

in the event that you wish to have restricted processing instead of deletion. Furthermore, a restriction of processing takes place in the event that the data is no longer necessary for the purposes pursued by us, but you require the data for the assertion, exercise or defense of legal claims, and if the successful exercise of your objection is disputed between us and you (Article 18 DSGVO).

- **Right to data portability:** You have the right to obtain from us the personal data concerning you that you have provided to us in a structured, commonly used, machine-readable format (Article 20 DSGVO), insofar as this data has not already been deleted.

XI. Right of objection, revocation and complaint

1. Revocation

If you have given your consent to the processing of your data, you may **revoke** this consent **at any time.** Such revocation affects the permissibility of processing your personal data after you have expressed it to us.

The revocation of a declaration of consent can be made by e-mail to datenschutz@lavera.de or in writing to:

Laverana GmbH & Co. KG, Am Weingarten 4**,** 30974 Wennigsen, Germany

with the addition of "the data protection officer".

Please note that the revocation is only effective for the future. Processing that took place before the revocation is not affected. Your revocation may have the consequence that we can no longer provide our services in whole or in part without processing this data.

2. Opposition

Insofar as we base the processing of your personal data on the balance of interests, you may **object to the processing**. This is the case if the processing is not necessary, in particular, for the performance of a contract with you. We will stop processing your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or if the processing serves the purpose of asserting, exercising or defending legal claims.

XII. Right to complain to the supervisory authority

If you believe that we are in breach of the GDPR by processing personal data relating to you, you also have the right to lodge a complaint with a supervisory authority.

The address of the supervisory authority responsible for us is:
The State Commissioner for Data Protection of Lower Saxony
Barbara Thiel
Prinzenstrasse 5
30159 Hanover