

Data protection information according to Article 13 GDPR

<i>Distribution list:</i> Homepage	<i>Scope:</i> Public	<i>Created/changed:</i> 16/03/22 / Ga	<i>Reviewed:</i> 03/04/22 Rb
---------------------------------------	-------------------------	--	---------------------------------

Principles of data processing

In the course of this business relationship, your personal data is processed by the data controller and stored for the period required to fulfil the specified purposes and comply with the statutory requirements. Below, we inform you of the data this refers to, in what way the data is processed and what rights you have in regard to processing, in particular under the General Data Protection Regulation (GDPR).

Who is the data controller responsible for the data processing?

The data controller for the purposes of data protection is:

MEMMINGER-IRO GMBH, Jakob-Mutz-Str. 7, 72280 Dornstetten

More information about our company, details of the authorised representatives of the company and additional contact options are provided in the legal notice on our website: <https://www.memminger-iro.de>

What personal data from you do we process? And for what purposes?

We only process the personal data that is required to perform the specified purposes and to comply with our statutory obligations. This data may fall into the following categories:

- Contact information such as title, first name, last name, address, email address, and phone numbers
- Other information such as access data, IP-address and payment data

If we have received data from you then we only process such data for the purposes for which we have received or collected the data, such as:

- to perform the contract and to process the contract;
- to enter into correspondence with you;
- to comply with legal and statutory obligations;
- to safeguard legitimate interests;
- to process any potentially pre-existing reciprocal transactions.

Any data processing for other purposes is only then considered if the legal requirements pursuant to Article 6(4) GDPR are met. As a matter of course, we comply with all our obligations to provide information pursuant to Article 13(3) and Article 14(4) GDPR.

What is the legal basis for processing?

The legal basis for the processing of personal data is Article 6 GDPR, in the absence of other specific legal provisions. The following are possible bases for processing:

- Consent (Article 6(1)(a) GDPR)
- Data processing for the performance of contracts (Article 6(1)(b) GDPR)
Data processing is required in particular in order to safeguard the completeness and accuracy of the data and the digitalisation of the data and in order to be able to perform the contract.
- Data processing on the basis of a balance of interests (Article 6(1)(f) GDPR)
Data processing is required in particular in order to safeguard and optimise informed decision-making of the persons involved in your interest and also to safeguard a permanently high level of quality and uniformity of customer care by the controller.
- Data processing for compliance with a legal obligation (Article 6(1)(c) GDPR)
Data processing is required in particular to ensure that tax data is complete and accurate in accordance with the German Tax Code (AO), Trade Ordinance (GewO) and Commercial Code (HGB).

If personal data has been processed on the basis of your consent, you have the right to **withdraw** your consent to us with future effect at any time. If we process data on the basis of a balance of interests, you have the right as a data subject to object to the processing of your personal data, subject to the conditions of Article 21 GDPR.

How long is data stored?

We process data for as long as processing is required for the specific purpose. For statutory retention periods – e.g. in commercial law or tax law, the relevant personal data must be stored for the duration of the statutory retention period (10 years). On expiry of the statutory retention period, the data is checked to identify whether there is any further need for processing. If there is no requirement for further processing, the data is erased (deleted). The general storage period of personal data may, in exceptional cases, be up to 30 years if this is required for the assertion, exercise or defence of legal claims.

You may of course request access from us at any time (see below) To your personal data stored with us and if there is no contrary requirement you can request that the data is deleted (erased) or that processing of the data is restricted.

Data protection information according to Article 13 GDPR

<i>Distribution list:</i> Homepage	<i>Scope:</i> Public	<i>Created/changed:</i> 16/03/22 / Ga	<i>Reviewed:</i> 03/04/22 Rb
---------------------------------------	-------------------------	--	---------------------------------

To which recipients is the data disclosed?

Your personal data is only disclosed to third parties if this is required for the performance of a contract with you, the disclosure is allowed on the basis of a balance of interests within the meaning of Article 6(1)(f), we have a legal obligation to disclose the data or you have given your consent to disclosure.

Transfer of personal data to a third country

There are no plans to transfer your personal data to a third country or to an international organisation, unless this is required for the performance of the contract with you. If legally required, you will be informed separately of the details.

Where is the data processed?

Your personal data is processed by us at our data centres in the Federal Republic of Germany.

Audio and video conferencing

Data processing

We use online conference tools to communicate with our customers. The specific tools we use are listed below. If you communicate with us by video or audio conference over the Internet, your personal data is collected and processed by us and by the provider of the applicable conference tool.

The conference tools collect all the data that you provide/enter to use the tools (email address and/or your phone number). The conference tools also process the duration of the conference, the start and end (time) of participating in the conference, the number of participants and other "contextual information" related to the communication process (metadata).

The tool provider processes all the technical data required to handle online communication as well. This includes, in particular: IP addresses, MAC addresses, device IDs, device type, operating system type and version, client version, camera type, microphone or speaker, and the type of connection.

If content is shared, uploaded or otherwise made available within the tool, such content is also stored on the tool providers' servers. Such content includes, but is not limited to: cloud recordings, chat/instant messages, voicemails, uploaded photos and videos, files, whiteboards and other information shared while using the service.

Please note that we do not have full control over the data processing operations of the tools that are used. Our options are mainly determined by the corporate policy of the applicable provider. For further information about data processing by the conference tools, please see the privacy policies of each tool that is used, which we have listed below this text.

Purpose and legal bases

The conference tools are used to communicate with potential or current contracting parties or to offer certain services to our customers (Article 6(1)(b) GDPR). The tools are also used generally to simplify and speed up communication with us or our company (legitimate interest within the meaning of Article 6(1)(f) GDPR). If consent has been requested, the relevant tools are used on the basis of such consent; consent may be withdrawn at any time with effect for the future.

Storage period

The data we collect directly via the video and conference tools is deleted (erased) from our systems as soon as you request us to delete it, you withdraw your consent to store it or the purpose for storing the data no longer applies. Stored cookies stay on your device until you delete them. Mandatory statutory retention periods remain unaffected. We have no control over the storage period of your data that is stored by the operators of the conference tools for their own purposes. For details, please contact the operators of the conference tools directly.

 MEMMINGER-IRO GMBH D-72277 DORNSTETTEN	Data Protection Policy	No.: 000-992-019-01 Page 3 of 3	
Data protection information according to Article 13 GDPR			
<i>Distribution list:</i> Homepage	<i>Scope:</i> Public	<i>Created/changed:</i> 16/03/22 / Ga	<i>Reviewed:</i> 03/04/22 Rb

Conference tool that we use

We use the following conference tool:

StarLeaf

We use StarLeaf. The provider is StarLeaf Limited, 7 Hatters Ln, Croxley Park, Watford WD18 8YN, United Kingdom. For details about data processing, please see StarLeaf's privacy policy: <https://support.starleaf.com/legal-information/starleaf-privacy-policy/>

Conclusion of an agreement with our data processor for processing on our behalf

We have concluded a data processing agreement with the provider StarLeaf and fully implement the strict requirements of the German data protection authorities when using StarLeaf.

Your rights as a data subject:

- Pursuant to Article 15 GDPR, you have the right of access to your personal data processed by us. In particular, you can request access to the processing purposes, the category of the personal data, the categories of recipients to whom your personal data have been or will be disclosed, the planned storage period, the existence of a right to rectification, erasure, restriction of processing or objection, the right to lodge a complaint, the origin of your data if the data was not collected by the controller, and the existence of automated decision-making, including profiling, and where required, meaningful information about the details of profiling.
- Pursuant to Article 16 GDPR, you have the right to request the immediate rectification of inaccurate or incomplete personal data stored by the controller.
- pursuant to Article 17 GDPR, you have the right to request the erasure of personal data by at the controller unless the processing is necessary for exercising the right of freedom of expression and information, for compliance with a legal obligation, for reasons of public interest or for the establishment, exercise or defence of legal claims.
- Pursuant to Article 18 GDPR, you have the right to request the restriction of processing of your personal data if the accuracy of the data is contested by you, the processing is unlawful, but you oppose the erasure of the data, the controller no longer requires the data, but you require them for the establishment, exercise or defence of legal claims, or you have lodged a claim against the processing pursuant to Article 21 GDPR.
- Pursuant to Article 20 GDPR, you have the right to request that the personal data that you have made available to the controller is provided to you in a structured, commonly used and machine-readable format or that it is transmitted to another controller.
- pursuant to Article 7(3) GDPR, you have the right to withdraw the consent you have given to the controller, at any time. This means that the data controller must no longer continue data processing that was exclusively based on such consent, for the future.
- Pursuant to Article 77 GDPR, you have the right to lodge a complaint with a supervisory authority. This normally means that you can contact the supervisory authority of your habitual residence or place of work or at our company head office.

For any access request not in writing, we ask for your understanding if, where necessary, we request documents from you which prove that you are the person you claim to be.

Right to object: In particular, you have a right to object pursuant to Article 21(1) and (2) to the processing of your data for direct marketing purposes, if such direct marketing is undertaken on the basis of a balance of interests.

Our data protection officer

We have appointed a data protection officer at our company. You can contact our data protection officer using the following contact details:

IDKOM Networks GmbH - Data Protection Officer, Dieselstraße 1, 87437 Kempten
Mr Thomas Hug, email: datenschutz@idkom.de

Right to lodge a complaint

You have the right to lodge a complaint about our processing of your personal data with a data protection supervisory authority:

The Baden-Wuerttemberg State Commissioner for Data Protection and Freedom of Information
PO Box 10 29 32, 70025 Stuttgart, Germany
Phone +49 (0) 711/61 55 41 - 0, fax +49 (0) 711/61 55 41-15, email: poststelle@lfdi-bwl.de,
Internet: www.baden-wuerttemberg.datenschutz.de