



General data protection declaration for business partners

It's a priority for TURM-Sahne GmbH to protect your personal rights when processing personal data.

The purpose of this document is to inform you about the processing of your personal data within the scope of existing or prospective business relations and to give you an overview of your rights under the data protection laws and regulations.

Who are the data controller and the data protection officer?

The controller for data processing is

TURM-Sahne GmbH, Westerender Weg 24a, D – 26125 Oldenburg.

You can contact our **data protection officer** at the above address or by e-mail at datenschutz@turm-sahne.de.

Which data categories do we use?

We process the following data categories that we have obtained or collected from you:

- Personal master data (e.g., name, address),
- Contract, billing and payment data,
- Communication data (e.g., telephone, e-mail, fax),
- Business history data.

and any other information required to initiate or conduct the business relationship.

We also process personal data obtained from public directories (for example, commercial registers) in compliance with data protection requirements, or that we have received from reliable third parties (for example, courts, authorities, insurance companies, credit agencies).

For what purposes and on what legal basis is data processed?

We process your personal data in compliance with the provisions of the EU General Data Protection Regulation (GDPR), the German Federal Data Protection Act (BDSG) as well as all other relevant laws and regulations.

The data processing takes place

- to fulfil a contract or to implement pre-contractual measures (Article 6 (1b) GDPR),
- to fulfil a legal obligation to which the controller is subjected (Article 6 (1c) GDPR),
- to pursue the following legitimate interests of the controller (Article 6 (1) (f) GDPR), provided that our interests are not overridden by your interests or fundamental rights and freedoms
 - Establishment and defense of legal claims,
 - Prevention of criminal offences,
 - Measures to optimize the internal processes relevant to the business relationship,
 - Reduction of default risks through consultation with credit agencies,
 - Measures to ensure the security of buildings and facilities as well as the protection of property rights (e.g. access controls),
 - Implementation of prequalification measures

Under certain circumstances we carry out prequalification procedures when establishing contractual relationships. Their purpose is to ensure the fulfilment of the applicable requirements of the German Foreign Trade Act, the German Money Laundering Act and the integrity of the business partner, its bodies and/or beneficial owners.

We process this data on the basis of our legitimate interest (Article 6 (1) (f) GDPR) as well as to fulfil legal obligations (Article 6 (1) (c) GDPR). For this purpose we also obtain information from third parties.

- on the basis of your consent (Article 6 (1) (a) GDPR)

You may withdraw your consent with future effect at any time by contacting the controller at the above-mentioned address. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

To which recipients will the data be transferred?

In our company, the above-mentioned categories of person data will only be disclosed to persons or offices that require this information to fulfil the specified processing purposes.

In addition, we may transfer your personal data to other recipients outside the company where this is necessary for us to meet our contractual and statutory obligations (such as authorities, supporting service providers, insurance companies, credit agencies). Our service providers are bound by instructions and have a confidential obligation to process personal data in accordance with the law.

We have limited our storage location to data centers in the European Union only, so data processing does not take place outside the European Union (EU). However, technically we can not completely avoid routing or storage on servers outside the European Union at the processor Microsoft. A secure level of data protection is guaranteed through the conclusion of an order processing contract and supplemented EU standard data protection clauses as well as the use of suitable technical and organizational measures (including transport encryption, end-to-end encryption for 1: 1 calls). With regard to personal data stored by Microsoft in the U.S. and Europe that may be subject to requests for information from government agencies in the U.S., Microsoft warrants in a statement dated October 14, 2021 that Microsoft will not provide any government agency with direct, indirect, blanket or unrestricted access to Customer Data. In the event of a government request to release data, Microsoft will not provide the data directly, but will first refer the requesting government agency directly to the customer. If the authority nevertheless requests the surrender of stored content data from Microsoft, Microsoft will conduct a comprehensive legal review of the legitimacy of the requested surrender and will only comply with this request if it is justified. Despite the applicable secrecy regulations under the NSL and FISA, Microsoft is endeavoring to provide the greatest possible transparency to customers within the scope of its possibilities. In a legal settlement, Microsoft has obtained at least limited permission to disclose certain data about such requests. Microsoft's request to be allowed to inform customers about requests has also been granted by the authorities in some cases.

What data protection rights can you enforce as a data subject?

You have the right to request **information** on the data stored in relation to your person. You can also request the **rectification** or **erasure** of your data or **restrict** the processing of your data as far as you are legally entitled to do so. In addition there is a right to **data portability**.

Right to object

Where we process your data to safeguard our legitimate interests, you can object to this processing on grounds relating to your particular situation. We shall no longer process your personal data, unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or the establishment, exercise or defense of legal claims.

Right to complain

You can lodge a complaint with the competent supervisory authority.

How long will your data be stored?

We store your personal data as long as necessary to fulfil our legal and contractual obligations.

If it is no longer necessary to store said data to fulfil contractual or legal obligations, it will be deleted unless it is necessary to continue processing it for the following purposes:

- Fulfilment of commercial and tax law storage obligations (resulting from the German Commercial Code (HGB) and/or German Fiscal Code (AO)),
- Preservation of evidence within the framework of the legal statute of limitations.

Are you required to provide your data?

Within the framework of our business relationship, you are obliged to provide us with the personal data needed to initiate and implement a business relationship as well as fulfil the associated contractual obligations or which we are legally obliged to collect. If you do not provide us with said data, we cannot fulfil our contractual and legal obligations.