

## **INFORMATION ABOUT DATA PROTECTION FOR BUSINESS PARTNERS (CUSTOMERS, SUPPLIERS AND OTHER BUSINESS PARTNERS)**

In order to create greater transparency in relation to the processing of personal data by companies, European legislators have introduced a new information obligation. As soon as any data is collected, you as the business partner should learn what will happen to your personal data and for what purposes it is to be processed. You are provided with the information below as a result of Art. 13 of the GDPR.

### **1. CONTROLLER AND DATA PROTECTION OFFICER**

The controller for the purpose of processing personal data is Progroup Board GmbH, Prowellstr. 1, 76877 Offenbach an der Queich (Germany), represented by the Executive Board. You can contact the controller using the following contact details: Phone: +49 (0) 6348 - 6109600, Telefax +49 (0) 6348 - 6109609, e-mail: [info@progroup.ag](mailto:info@progroup.ag). You can contact the company's data protection officer at: [datenschutz@progroup.ag](mailto:datenschutz@progroup.ag)

### **2. PURPOSES, LEGAL BASES AND PROVISION OF YOUR DATA**

#### **2.1 CONTRACTS**

##### **2.1.1 GENERAL CONTRACTUAL RELATIONSHIPS**

Your personal data is processed for the purpose of initiating and concluding contracts, communicating as part of the implementation of contracts, invoicing and for processing payments.

The admissibility of the processing is based on Art. 6 (1 b)) of the GDPR (implementing a contract or a measure prior to entering into a contract).

The admissibility of the processing is further based on Art. 6 (1 f)) of the GDPR (legitimate interest). Our legitimate interests lie, for example, in electronic and more efficient processing of data and optimising the work processes taking place overall.

It is necessary to provide your personal data to be able to conclude a contract with us. The consequence of a failure to provide such data is that a contract cannot materialise and be implemented.

##### **2.1.2 SPECIAL CONTRACTUAL RELATIONSHIPS WITH FORWARDING AGENTS**

In the context of the initiation and conclusion of contracts, communication as part of the implementation of contracts, invoicing and payment processing, but also the implementation of logistics processes and the associated promotion of the communication and information flow, the

following categories of personal data may be processed by you, among others: Personal master data and communication data.

The admissibility of the processing is based on Art. 6 (1 b)) of the GDPR (implementing a contract or a measure prior to entering into a contract).

The admissibility of the processing is further based on Art. 6 (1 f)) of the GDPR (legitimate interest). Our legitimate interest lies in the design of efficient and flexible processes within the framework of the cooperation with our forwarding agents, the optimisation of our logistics processes as well as the simplification and acceleration of the flow of information and communication using various platforms and tools for logistics management. In addition, as part of determining our carbon footprint, evaluations of various parameters are carried out, such as the amount of fuel consumed or distances travelled. Our legitimate interest in this respect lies in evaluating the sustainability of our company.

It is necessary to provide your personal data to be able to conclude a contract with us. The consequence of a failure to provide such data is that a contract cannot materialise and be implemented.

## **2.2 DIRECT ADVERTISING AND INTERNAL ANALYSIS**

We process your personal data in order to provide you in particular as a customer with information about our offers, for example product data sheets.

Furthermore, your data will be used for internal analyses (e.g. to conduct customer satisfaction surveys). In specific cases, this data will be supplemented with publicly available socio-demographic data in order to enable an individual approach with customised offers, but also to improve customer satisfaction.

The admissibility of the processing is based on Art. 6 (1 f)) of the GDPR (legitimate interest). We have a legitimate interest in actively offering our services, in particular in recruiting customers, making the promotional approach as individual as possible and optimising the business relationship with you.

## **2.3 CREDITWORTHINESS INFORMATION**

We reserve the right to obtain appropriate information about you before entering into a contract or if we become aware of circumstances which damage creditworthiness. If this information is negative, we may refuse to enter into a contract with you.

The admissibility of the processing is based on Art. 6 (1 f)) of the GDPR (legitimate interest). Our legitimate interest lies in assessing your creditworthiness and reducing the risk of payment defaults.

## **3. RECIPIENTS**

As part of delivering a service, your personal data will be forwarded to the respective departments and processed and in some circumstances also passed on to other companies (e.g. group-affiliated companies, contractual partners and their affiliated companies, shipping providers, tax advisers). In these cases, the passing on is covered by a legal basis or is done as part of the processing of an order.

In connection with the fulfilment of a contract or carrying out measures prior to entering into a contract, it may be necessary in a specific case for your personal data to be processed in a third country outside of the EU or the EEC. This is generally only done within the framework of using established software that is customary within the market and following the particular requirements of Art. 44 ff. of the GDPR (adequacy decision, binding internal data protection regulations, standard data protection clauses).

## **4. STORING YOUR DATA**

### **4.1 GENERAL CONTRACTUAL RELATIONSHIPS**

Your data is first stored when contact is first established, e.g. by e-mail or phone or by an exchange of e-mails or written documents. We delete your personal data when the contractual relationship has ended, all mutual demands have been met and there are no statutory retention requirements or legal bases for storage. Even after the contractual relationship comes to an end, we will continue to use your postal address for advertising purposes, unless you object to this.

If your data has been made anonymous for analytical purposes, it will be stored and used without any time limit. If your data has been processed as part of customer satisfaction surveys, it will be made anonymous after three months so that no further personal reference can be made.

### **4.2 SPECIAL CONTRACTUAL RELATIONSHIPS WITH FORWARDING AGENTS**

Your personal data may also be disclosed to and stored by our external service providers for provision and use of various platforms and tools for logistics management, among other reasons, as part of performing logistics processes.

For more information on the processing of your personal data, please refer to the respective platform or tool provider.

## **5. RIGHTS OF THE DATA SUBJECT**

You enjoy the following rights:

You have a right to access (Art. 15 GDPR), rectification (Art. 16 GDPR), erasure (Art. 17 GDPR), restriction of processing (Art. 18 GDPR) and to data portability (Art. 20 GDPR). We endeavour to deal with requests swiftly.

If your personal data are processed on the basis of Art. 6 (1 f) of the GDPR, you have a right to object if there are reasons for doing so arising from your particular situation or the objection is aimed at direct marketing (Art. 21 GDPR). If you object to direct marketing, we will no longer send you any marketing messages.

## **6. REVOCABILITY OF THE CONSENT**

Any consent to the processing of personal data that is granted can be revoked at any time. The lawfulness of the processing on the basis of the consent granted up until it is revoked remains unaffected.

## **7. QUESTIONS OR COMPLAINTS**

You have the right to contact a supervisory authority (Art. 77 GDPR).