

Information according to Art. 13/14 EU-GDPR

Data protection notice

This information provides an overview of our company's processing of your personal data and your rights under data protection law. The scope of individual data processing and data use depends primarily on the contractual obligations agreed with you for the supply of goods and services.

1.	Who is responsible	
	for data processing	
	and whom can I	
	contact?	

Controller:

Röhm GmbHDolivostrasse 17
64293 Darmstadt

Phone: +49 06151 18-0

Your data protection officer can be reached at:

RÖHM GmbH

Data Protection Officer

Dolivostraße 17 64293 Darmstadt

Phone: +49 6151 18-3770 datenschutz@roehm.com

Which sources and data do we use? Data types

We process the personal data we receive from you in the scope of our business relationship with you.

The personal data categories we process include:

- Contact information (first and last name, address, telephone number, mobile number, fax number and e-mail address)
- Other information required for processing contractual relationships or projects with our customers, service providers, suppliers or distribution partners (e.g. payment data, order data etc.)
- Other personal data that is needed to execute or conclude a contract

	 Log data recorded during the use of IT systems provided by Röhm GmbH
	 Results of safety tests and contract performance, if our contacts work at our sites
	We collect the personal data of our contacts directly from the contact or from our customers, service providers, suppliers or distribution partners as part of our contractual relationship.
	We also process personal data that is lawfully collected from publicly accessible sources (e.g. professional networks, credit agencies, real property registers, commercial and associations register, press, media).
	Moreover, we also process sales data.
3. What is the reason for processing your data (purpose of processing) and the legal basis?	We process personal data in compliance with the provisions of the European General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (BDSG).
3.1 For fulfillment of contractual obligations	RÖHM GmbH collects, processes and uses personal data to establish and fulfill obligations arising from contractual agreements associated with the supply of goods and services.
	The purpose of data processing primarily depends on the relevant contractual object (e.g. work supply contract, service contract) and may also include needs analysis and consulting.
	Further details on the purpose of data processing are specified in the respective contractual documents and terms and conditions.
3.2 As part of legitimate interests	 To the extent necessary, we will process your data beyond the actual contract performance to protect our own legitimate interests or those of third parties Examples:
	 Consultation of and data sharing with credit agencies to determine credit scores or default risks Asserting legal claims and defenses in legal disputes
	 Ensuring IT security and IT operations Preventing and investigating criminal offenses
	 Measures associated with building and facility security (e.g. access controls)
	Measures to assert domiciliary rights

	 Measures for business management and further development of services and products
3.3 Based on your consent	If you consent to the processing of personal data for specific purposes, such processing is lawful on the basis of your consent. You may revoke your consent at any time.
	However, please note that revocation is only effective for the future. Processing that occurred before the revocation of your consent is not affected.
3.4 Based on legal requirements	As a company, we also are subject to various statutory obligations, i.e. legal requirements and regulations (such as tax laws). Purposes of processing include the fulfillment of fiscal monitoring and reporting obligations as well as the assessment and management of risks.
4. Who receives my data?	Within our company, your data is sent to any unit that needs it to fulfill our contractual and statutory obligations. We may also share data with the contract processors we commission for the above-listed purposes. In addition to internal Group companies, this also includes companies in the categories of IT services and printing and shipping services. We comply with all applicable data protection regulations with regard to data forwarding to recipients outside of the company. We will only share information about you if we required to do so by law, in the scope of fulfilling contractual obligations, with your consent or if we are authorized to disclose information. Under these conditions, recipients of personal data may include:
	 Official bodies and institutions (e.g. government authorities) in the event of statutory or regulatory obligations. Additional data recipients may be entities to which data is transmitted with your consent.
5. How long will my data be stored?	We will process and store your personal data as necessary for the duration of our business relationship, which includes, e.g., the arrangement and execution of contracts.
	In addition, we are subject to various retention and documentation obligations resulting from, e.g., the German Commercial Code and Tax Code. These codes specify time limits for data retention or documentation ranging from two to ten years.
	Finally, data retention also is guided by statutory limitation periods, which generally are 3 years, for example pursuant to Sec. 195 et seq. of the German Civil Code, but can be as long as thirty years in

	certain cases.
6. Is data transferred to third countries or to an international organization?	We will only transfer data to third countries (countries outside of the European Economic Area (EEA)) to the extent necessary for fulfilling contractual obligations, under legal requirements, or with your consent.
	We will inform you separately about further details if required by law.
7. What are my data protection rights?	Under the law, all data subjects have the right to receive information about the processing of their personal data, the right to request rectification, the right to erasure, the right to restriction of processing or to object to processing as well as the right to data portability. The restrictions of Secs. 34 and 35, BDSG apply to the right to information and the right to erasure. Furthermore, you have the right to lodge a complaint with the competent supervisory authority (Art. 77, GDPR in conjunction with Sec. 19, BDSG).
8. Am I obligated to provide data?	Within the scope of our business relationship, you only need to provide the personal data that is required for establishing, implementing and terminating a business relationship or which we must collect according to the law. Without this information, we will generally not be able to conclude a contract or may have to terminate an existing contract because it can no longer be executed.
9. To which extent is there automated decision-making in individual cases?	We do not use automated decision-making to establish and implement business relationships. If we use such procedures in individual cases, you will be notified separately as stipulated by law.
10. To which extent is my data used for profiling (scoring)?	We do not use any data for profiling (scoring) to establish and implement business relationships.
11. Information about your right to object	You have the right to object, at any time, to the processing of personal data concerning you on grounds relating to your particular situation.
	If you object, we will no longer process your personal data, unless we have compelling legitimate grounds for processing, which override your interests, rights and freedoms or if the processing is associated with the establishment, exercise or defense of legal claims.
	Your objection does not have to be in any specific form and should be addressed to:
	RÖHM GmbH Data Protection

Dolivostraße 17
64293 Darmstadt