

## PRIVACY POLICY

*The protection of your data is very important to us!*

We at Friedrich Graepel AG handle your personal data sensitively and responsibly. How we do this is explained below. In principle, the basis for the storage and use of your data is your consent or legal permission. What we do with your data depends on this.

### 1. Prologue to understanding

“DSGVO” is used here as shorthand for the EU General Data Protection Regulation. The following information is provided in a transparent form to fulfill the information obligations in areas in which Graepel collects, processes or uses personal data as the controller.

In accordance with Art. 13 and 14 GDPR, Graepel informs data subjects about the detailed circumstances of the collection of personal data.

The information is structured below in the form of

- some general information, regardless of which target group you come from as a data subject.
- Information that Graepel provides in a targeted manner, depending on which target group you belong to as a data subject. You will find a separate section for each target group below.

### 2. General information for all target groups

Company name of the person responsible:  
Friedrich Graepel Aktiengesellschaft

Management Board of the company:  
Dipl.-Wirt.-Ing. Felix Graepel, Dipl.-Wirt.-Ing. Carlo Graepel

Management of data processing:  
Uwe Schone

Data Protection Officer:  
Bastian Spille, Kontakt: [datenschutz@graepel.de](mailto:datenschutz@graepel.de)

Address of the responsible body/person:  
Friedrich Graepel AG, Zeisigweg 2, 49624 Lönigen

Rights of the data subject:

In order to ensure fair and transparent processing, we would like to point out that the data subject has the following rights, among others

- in accordance with Art. 15 GDPR, to request information about your personal data processed by us. In particular, you can request information about the purposes of processing, the category of personal data, the categories of recipients to whom your data has been or will be disclosed, the planned storage period, the existence of a right to rectification, erasure, restriction of processing or objection, the existence of a right to lodge a complaint, the origin of your data if it was not collected by us, and the existence of automated decision-making including profiling and, if applicable, meaningful information about its details;
- in accordance with Art. 16 GDPR, to demand the immediate correction of incorrect or incomplete personal data stored by us

- in accordance with Art. 17 GDPR, to request the erasure of your personal data stored by us, 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 defense of legal claims
- in accordance with Art. 18 GDPR, to demand the restriction of the processing of your personal data if you dispute the accuracy of the data, the processing is unlawful but you refuse to delete it and we no longer need the data, but you need it to assert, exercise or defend legal claims or you have lodged an objection to the processing in accordance with Art. 21 GDPR
- in accordance with Art. 20 GDPR, to receive your personal data that you have provided to us in a structured, commonly used and machine-readable format or to request that it be transmitted to another controller
- in accordance with Art. 7 para. 3 GDPR, to revoke your consent to Graepel at any time. As a result, we may no longer continue the data processing that was based on this consent in the future and
- to lodge a complaint with a supervisory authority in accordance with Art. 77 GDPR. As a rule, you can contact the supervisory authority of your usual place of residence or workplace or the company headquarters.

If you wish to exercise these rights, please contact  
[datenschutz@graepel.de](mailto:datenschutz@graepel.de)

To exercise the right to lodge a complaint with the competent supervisory authority, you can obtain information at these web addresses  
[www.datenschutz-wiki.de](http://www.datenschutz-wiki.de) or [www.lfd.niedersachsen.de](http://www.lfd.niedersachsen.de)

**The supervisory authority responsible for Graepel AG is:**

Die Landesbeauftragte für den Datenschutz Niedersachsen  
 Prinzenstraße 5  
 30159 Hannover  
 Telefon: +49 511 120-4500  
 Telefax: +49 511 120-4599  
 E-Mail: [poststelle@lfd.niedersachsen.de](mailto:poststelle@lfd.niedersachsen.de)

**2.1 Right of objection**

If your personal data is processed on the basis of legitimate interests in accordance with Art. 6 para. 1 sentence 1 lit. f DSGVO, you have the right to object to the processing of your personal data in accordance with Art. 21 DSGVO, provided that there are reasons for this arising from your particular situation or the objection is directed against direct advertising. In the latter case, you have a general right to object, which will be implemented by us without specifying a particular situation.

If you wish to exercise your right of revocation or objection, simply send an e-mail to [datenschutz@graepel.de](mailto:datenschutz@graepel.de)

**2.2 Data security**

We use the SSL (Secure Socket Layer) method within the website in conjunction with the highest level of encryption supported by your browser. As a rule, this is 256-bit encryption. If your browser does not support 256-bit encryption, we use 128-bit v3 technology instead. You can tell whether an individual page of our website is transmitted in encrypted form by the closed display of the key or lock symbol in the lower status bar of your browser.

We also use suitable technical and organizational security measures to protect your data against accidental or intentional manipulation, partial or complete loss, destruction or unauthorized access by third parties. Our security measures are continuously improved in line with technological developments.

### 3. Target groups

#### 3.1 Online

You are currently on our website. We temporarily store the following data in order to detect technical errors, track and prevent misuse and optimize the user experience of the website:

- IP address of the requesting computer,
- Date and time of access,
- Name and URL of the accessed file,
- Website from which the access was made (referrer URL),
- browser used and, if applicable, the operating system of your computer and the name of your access provider.

The aforementioned data is processed by us for the following purposes

- Ensuring a smooth connection to the website,
- Ensuring a comfortable use of our website,
- evaluating system security and stability and
- for other administrative purposes.

You decide everything else yourself, i.e. what information you wish to share with us. To do this, make the appropriate settings for cookies in your Internet browser.

#### 3.2 Legal basis of the processing

The processing is carried out to protect our legitimate interests or the interests of a third party (Art. 6 para. 1 lit. f DSGVO).

#### 3.3 Analysis by WiredMinds

Our website uses the pixel-code technology of WiredMinds GmbH ([www.wiredminds.de](http://www.wiredminds.de)) to analyze visitor behavior. This involves processing the IP address of a visitor. The processing is carried out exclusively for the purpose of collecting company-relevant information such as the company name. IP addresses of natural persons are excluded from further use (whitelist procedure). The IP address is not stored in LeadLab under any circumstances. When processing the data, it is in our particular interest to protect the data protection rights of natural persons. Our interest is based on Art. 6 para. 1 lit. (f) GDPR. The data collected by us does not allow any conclusions to be drawn about an identifiable person at any time.

WiredMinds GmbH uses this information to create anonymous user profiles based on the behavior of visitors to our website. The data obtained is not used to personally identify visitors to our website. By clicking on the following link, you can permanently exclude the tracking of this website by WiredMinds. A technically necessary cookie will be set to permanently exclude you from tracking by WiredMinds LeadLab on this website. [Vom Tracking ausschließen](#)

#### 3.4 Use of cookies

We do not use cookies on our website.

### 4. Applicants

You've come to the right place if you are an applicant and would like some more information about your application.

#### 4.1 Purpose of the data collection, processing or use

Processing the application; checking suitability; making contact.

#### 4.2 Legal basis for the processing (Art. 6 GDPR)

Implementation of (also) pre-contractual measures taken at the request of the data subject (Art. 6 para. 1 lit. b).

The data subject consents voluntarily. This is the case through a corresponding declaration of consent (Art. 6 para. 1 lit. f).

Graepel fundamentally observes the principles of data avoidance and data minimization with regard to the intended purposes of the processing, taking into account the interests of the data subjects worthy of protection.

#### 4.3 Description of the groups of persons concerned and the relevant data or categories of data

Group of persons concerned: Applicants of the Graepel Group

Usual and necessary information of applicants for application procedures.

#### 4.4 Recipients or categories of recipients to whom the data may be disclosed

All employees who are authorized in-house to perform the intended tasks. In the case of payment transactions, credit institutions receive the necessary information. External contractors as subcontractors within the meaning of Section 11 BDSG (commissioned data processing) and Art. 28 GDPR. As a rule, this means that access to personal data is not the purpose of the contract, but cannot be ruled out.

#### 4.5 Data transfer to third countries

Data transfers to third countries only occur in the context of contract fulfillment, necessary communication and other exceptions expressly provided for in the BDSG n. F. and GDPR.

In the case of the use of Graepel subsidiaries in third countries, suitable guarantees (standard data protection clauses) are in place.

If Graepel itself subcontracts data processing, its guarantees are obtained through data protection contracts. Corresponding checks are carried out regularly. Further information can be obtained on request by contacting [datenschutz@graepel.de](mailto:datenschutz@graepel.de).

#### 4.6 Storage period or standard periods for the deletion of data

The legislator has issued various retention obligations and periods. Once these periods have expired, the corresponding data is routinely deleted if it is no longer required to fulfill the contract. For example, the commercial or financial data of a completed financial year is deleted after a further ten years in accordance with legal regulations, unless longer retention periods are prescribed or required for legitimate reasons. Shorter deletion periods are used in special areas (e.g. in personnel administration, such as rejected applications or warnings). If data is not affected by this, it is deleted when the purposes for which it was stored no longer apply.

## 5. Business contacts of the Graepel Group

#### 5.1 Purpose of the data collection, processing or use

Maintaining contact. So that we can get in touch with you for business purposes.

## 5.2 Legal basis for the processing (Art. 6 GDPR)

Depending on the phase of our contact, different legal bases are conceivable:

- Performance of (also) pre-contractual measures taken at the request of the data subject (Art. 6 para. 1 lit. b).
- The data subject consents voluntarily. This is the case through a corresponding declaration of consent (Art. 6 para. 1 lit. a).
- The processing is necessary to fulfill contractual obligations and to protect the legitimate interests of the Graepel Group (Art. 6 para. 1 lit b and lit f).

Graepel fundamentally observes the principles of data avoidance and data minimization with regard to the intended purposes of processing, taking into account the legitimate interests of the data subjects.

## 5.3 Description of the groups of persons concerned and the relevant data or categories of data

Affected group of persons: Graepel's business contacts; e.g. contact persons of customers, suppliers, service providers, partners.

Usual and necessary contact details (surname, first name, title, company affiliation, department if applicable, telephone number, e-mail address).

## 5.4 Recipients or categories of recipients to whom the data may be disclosed

All employees who are authorized in-house to perform the intended tasks. In the case of payment transactions, credit institutions receive the necessary information. External contractors as subcontractors within the meaning of Art. 28 GDPR are, for example, plant representatives, transport companies, tax consultants and IT service providers.

In addition, the data is transmitted to companies of the Graepel Group for a specific purpose. These are

- Friedrich Graepel Aktiengesellschaft | D
- Graepel Lönigen GmbH & Co. KG | D
- Graepel Seehausen GmbH & Co. KG | D
- Graepel North America | Omaha, NE | USA
- Graepel Oberflächentechnik GmbH & Co. KG | D
- Graepel Perforations India Pvt. Ltd | IN

These transmissions are made in order to process our order with you (Art. 6 para. 1 lit f GDPR).

## 5.5 Data transfer to third countries

Data transfers to third countries take place in the context of contract fulfillment, Art. 6 para. 1 lit. b and for legitimate interest, Art. 6 para. 1 lit. f, as well as other exceptions expressly provided for in the BDSG or GDPR.

In the case of the use of Graepel subsidiaries in third countries, suitable guarantees (standard data protection clauses) are in place.

## 5.6 Storage period or standard periods for the deletion of data

The legislator has issued various retention obligations and periods. Once these periods have expired, the corresponding data is routinely deleted if it is no longer required to fulfill the contract. For example, the commercial or financial data of a completed financial year is deleted after a further ten years in accordance with legal regulations, unless longer retention periods are prescribed or required for legitimate reasons. If data is not affected by this, it is deleted when the purposes for which it was stored no longer apply. Contacts of persons who are known to have left the company are set to inactive and therefore no longer appear in standard searches.

## 6. Visitors and guests

### 6.1 Purpose of the data collection, processing or use

We collect your data for operational and occupational safety reasons.

### 6.2 Legal basis for the processing (Art. 6 GDPR)

There are different legal bases for the collection of data:

- The data subject consents voluntarily. This is the case through corresponding consent (Art. 6 para. 1 lit. a).
- The protection of a legitimate interest of the Graepel Group (Art. 6 para. 1 lit. f).

Graepel fundamentally observes the principles of data avoidance and data minimization with regard to the intended purposes of processing, taking into account the legitimate interests of the data subjects.

### 6.3 Description of the groups of persons concerned and the relevant data or categories of data

Group of persons concerned: Visitors and guests

Usual and necessary contact details (surname, first name, title, company affiliation, department if applicable, telephone number, e-mail address, vehicle registration number).

### 6.4 Recipients or categories of recipients to whom the data may be disclosed

All employees who are entrusted in-house with the fulfillment of dedicated tasks.

### 6.5 Data transfer to third countries

Data is not transferred to third countries for this purpose.

### 6.6 Storage period or standard periods for the deletion of data

The data will be deleted after a retention period of 14 days.

Löningen, April 2024

The Data Protection Officer