

Data protection information in accordance with the EU General Data Protection Regulation for natural and legal persons

The following information is intended to give you an overview of how we process your personal and company-related data and your rights under data protection law. Which specific data is processed and how it is used depends largely on the products or agreed services. The following data protection information applies in particular to customers, interested parties and authorised representatives/agents.

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

The responsible body is:

Richard Anton KG
Würmstrasse 55, 82166 Gräfelfing
Telephone: 089 - 8981440 or email: info@richard-anton.de
represented by the managing director Mr Florian Mader

You can contact our data protection officer, Mr. Stephan Krischke, at
datenschutz@richard-anton.de

2. What sources and data do we use?

We process personal data that we receive from our customers in the course of our business relationship. In addition, we process personal data that we obtain from publicly accessible sources (commercial and association registers, press, Internet) in a permissible manner and that is legitimately transmitted to us by other companies or other third parties, insofar as this is necessary for the fulfilment of the business relationship or for the provision of our services. Relevant personal data in the prospecting process, when recording master data, in the course of an order, etc. may include personal details (e.g. first and last name, address, email and telephone number), delivery and payment data (e.g. bank details) and order data (e.g. order information). In addition, this may also include data for the fulfilment of contractual obligations and data for other categories comparable to those mentioned.

3. Why do we process your data (purpose of processing) and on what legal basis?

We process personal/company data in accordance with the provisions of the European General Data Protection Regulation (GDPR) and the Federal Data Protection Act (BDSG):

- a) To fulfil contractual obligations (Art. 6(1)(b) GDPR): Data is processed for the purpose of conducting commercial transactions within the framework of our contracts with our customers and for the implementation of pre-contractual measures that are carried out on request (e.g. from interested parties). The purposes of data processing are primarily based on the specific product (e.g. carburising material, petroleum coke, graphite and pig iron) and may include, among other things, needs analyses, consulting, quality assurance and the fulfilment of contractual obligations. Further details on the data processing purposes can be found in the relevant contract documents and terms and conditions.
- b) Within the scope of balancing interests (Art. 6(1)(f) GDPR): Where necessary, we process your data beyond the actual fulfilment of the contract to protect our legitimate interests, e.g. trade fair invitations, safety information on products and to improve customer loyalty by providing information on product improvements or innovations.

- c) Based on your consent (Art. 6(1)(a) GDPR): If you have given us your consent to process personal data for specific purposes, the lawfulness of this processing is based on your consent. Consent that has been given can be revoked at any time. This also applies to the revocation of declarations of consent that were given to us before the GDPR came into force, i.e. before 25 May 2018. The revocation of consent does not affect the lawfulness of the data processed until revocation.
- d) Due to legal requirements (Art. 6(1)(c) GDPR) or in the public interest (Art. 6(1)(e) GDPR): As a company, we are also subject to various legal obligations, i.e. legal requirements and commercial and tax regulations. The purposes of processing include identity verification, fraud and money laundering prevention, and the fulfilment of tax obligations.

4. Who receives my data?

Within our company, those departments and employees who need your data to fulfil our contractual and legal obligations have access to it. Service providers and vicarious agents employed by us may also receive data for this purpose if they maintain the appropriate confidentiality. With regard to the transfer of data to recipients outside our company, it should first be noted that we as a company are committed to maintaining confidentiality about all customer-related facts and assessments that come to our knowledge. We may only pass on information about you if required to do so by law, if you have given your consent, or if we are obliged to provide information by law.

5. Is data transferred to a third country or to an international organisation?

Data is transferred to locations in countries outside the European Economic Area (so-called third countries) if

- it is necessary for the execution of the order
- it is required by law, or
- you have given us your consent.

Beyond this, we do not transfer any personal data to entities in third countries or international organisations.

6. How long will my data be stored?

We process and store your personal data for as long as is necessary to fulfil our contractual and legal obligations. It should be noted that our business relationship is a continuing obligation, which may also be established over a longer period of time. If the data is no longer required for the fulfilment of contractual or legal obligations, it will be deleted on a regular basis, unless its further processing – – is necessary for the following purposes:

- Fulfilment of commercial and tax law retention obligations: these include the German Commercial Code (HGB), the German Fiscal Code (AO) and the German Money Laundering Act (GwG). The retention and documentation periods specified therein range from two to ten years.
- Preservation of evidence within the framework of the statutory limitation provisions. According to Sections 195 et seq. of the Civil Code (BGB), these limitation periods can be up to 30 years, with the regular limitation period being 3 years.

7. What data protection rights do I have?

Every data subject has the right to information under Art. 15 GDPR, the right to rectification under Art. 16 GDPR, the right to erasure under Art. 17 GDPR, the right to restriction of processing under Art. 18 GDPR, the right to object under Art. 21 GDPR and the right to data portability under Art. 20 GDPR.

The restrictions under Sections 34 and 35 of the Federal Data Protection Act (BDSG) apply to the right to information and the right to erasure. In addition, you have the right to lodge a complaint with a competent data protection supervisory authority (Article 77 GDPR in conjunction with Section 19 BDSG). You can revoke your consent to the processing of personal data at any time. This also applies to the revocation of declarations of consent that were given to us before the General Data Protection Regulation came into force, i.e. before 25 May 2018. Please note that the revocation only takes effect for the future. Processing that took place before the revocation is not affected.

8. Am I obliged to provide data?

Within the scope of our business relationship, you must provide the personal data that is necessary for establishing and conducting a business relationship and fulfilling the associated contractual obligations, or that we are legally obliged to collect. Without this data, we will generally not be able to conclude or execute the contract with you.

9. To what extent is there automated decision-making?

We do not use automated decision-making in accordance with Art. 22 GDPR for the establishment and execution of the business relationship.

10. Is profiling carried out?

We do not process data for the purpose of evaluating certain personal aspects.