



FELDER Group's Privacy Statement

Controller and contact details

FELDER KG, KR-Felder-Straße 1, 6060 Hall in Tirol, Österreich

You can contact us at any time if you have any questions regarding data protection.

You can receive information on data protection at dataprotection@felder-group.com

Data protection officer's contact details

dataprotection@felder-group.com

Information about its data subjects and the right to appeal

In the following document, we will inform you about the processing of your personal data obtained through using our website. In principle, users can visit our site without registering. While such data remains anonymous, data such as pages visited or files accessed and their date and time are stored on our server for statistical use. Personal data, in particular, names, addresses, e-mail addresses may be collected at any time without permission. Data may not be transmitted to third parties without your permission.

The rights of the persons affected may be asserted should the corresponding criteria be met. Please note that you may be required to provide proof of identification in advance.

- Right of access to data: you may freely request confirmation as to whether personal data about you has been processed and request access to such data and information in accordance with Article 15 of the GDPR.
- Right to amend if we process incorrect or incomplete data about you (Art. 16 GDPR).
- Right to delete personal data if the criteria of Art. 17 GDPR are fulfilled.
- Right to restrict the processing of your data in accordance with Art. 18 of the GDPR.
- Right to transfer and receive personal data that you have supplied in an automated process in a format that is structured, conventional and machine readable. (Art. 20 GDPR).
- For processing based on a legitimate interest, you have the right to object at any time in accordance with Art. 21 of the GDPR. This right is unrestricted in cases where data shall be processed for the purpose of direct advertising and related profiling.
- You may revoke your consent for the processing of personal data at any time; the legality of the data processing up until such a time at which you revoke this right is not affected by this.

Right of Appeal

You have the right to appeal to a relevant supervisory authority (data protection authority), in particular in the EU Member State of your place of residence, your workplace or the place of suspected infringement, if you believe that the processing of personal data concerning you violates the Basic Data Protection Regulation or if your rights as a data subject have been violated. We would be most appreciative if you could contact us and offer us your opinion. A list of the supervisory authorities can be found here: http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080.



Should you wish to contact us directly, we are available to answer any questions you may have about data protection at dataprotection@felder-group.com. We would like to point out that your queries can only be processed if you can confirm your identity.

1. Using the website and our IT systems (maintenance and security)

Purposes of processing

In order to operate and maintain our IT systems and the company website, to ensure data security and to prevent abusive or fraudulent behaviour, we process our users' personal data solely as required for the provision of our services and its contents.

Legal bases and (substantial) legitimate interests

We process your data for pre-contractual provisions or contractual duties (such as fulfilling the terms and conditions, terms of use and article 6, paragraph 1, lit. b of the GDPR) to the extent legally required (article 6, paragraph 1, lit. c of the GDPR, e.g. consent to authorise cookies and ensuring the appropriate level of data security), as well as for the following (substantial) legitimate interests, based on article 6, paragraph 1, lit. f of the GDPR):

- ensuring a fully-functional and attractive representation online,
- maintaining data security,
- efficient internal administration within the company / group.

Receivers or receiver categories and transfers to third countries or international organisations

Transfers are not intended but users of our services and published data (such as comments) are, however, public and potentially accessible worldwide. If required, the data may be transferred to prosecution authorities, courts etc. for asserting legal claims made by the controller or third parties.

We use the services of the following processors:

Google Analytics

Our site uses Google Analytics, a web based analysis service from Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. To deactivate Google Analytics, Google provides a browser plug-in at <http://tools.google.com/dlpage/gaoptout?hl=en>. Google Analytics uses Cookies. Cookies are small text files that allow us to store specific information regarding the user on their device while they use the website. This allows analysis of the use of our web page via Google. The information collected by the cookie about the use of our pages (including your IP address) is usually transferred to a Google server in the USA and stored there. We wish to make clear that Google Analytics has been extended on this website using the code 'gat._anonymizeIp();' in order to provide an anonymised record of IP addresses (known as IP masking). If anonymisation is active, Google abbreviates all IP addresses within European Union Member States or in other signatory countries to the EEA Agreement, so that no assumptions can be made about to your identity. In exceptional cases

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only, the full IP address is transmitted to a Google server in the USA and abbreviated there. Google complies with the data protection provisions of the «Privacy Shield» agreement. It is registered with the US Department of Trade's Privacy Shield programme and uses collected information to examine usage of our website, to compile reports for us in relation to this usage, and to provide us with other related services. You can find more information at <http://www.google.com/intl/de/analytics/privacyoverview.html>.

Clicky

This website uses the Clicky Web Analytics service to collect statistical data on the use of our website. To this end, visitor information is collected and transmitted to servers belonging to Roxr Software Ltd. Users' website usage can be analysed using Clicky. To do this, so-called 'Cookies' - text files saved on your computer which allow your use of the website to be analysed, are transmitted to Roxr Software Ltd. You can find out more about the purpose and scope of data collection and its further processing and use by Clicky in Roxr Software Limited's privacy notices, atclicky.com/help/faq/features/cookies#/terms.

LiveZilla

This website collects and stores anonymised data for the purposes of web analysis and in order to operate the Live Chat system for answering Live Support enquiries. This technology is provided by LiveZilla Ltd, Byk-Gulden-Strasse 18, 78224 Singen (www.livezilla.net). This anonymised data can be used to create pseudonym profiles. Cookies can be used for this purpose. These are small text files which are saved locally on the website user's computer, thus (potentially) allowing the user to be recognised in the event of a repeat visit to our website. The pseudonymised user profiles will not be associated with personal data regarding the bearer of the pseudonym without the separate and explicit permission of the data subject. Technical measures are taken to ensure that IP addresses are anonymised automatically. You can prevent any form of web analysis by changing the appropriate settings on your browser (e.g. handling of Cookies).

The data controller, FELDER KG, is part of a group of companies. For internal economic administrative purposes, we therefore also manage data processing for the other companies within the group. Therefore, the group has a substantial legitimate interest (recital 48 of the GDPR).

All associated companies and processors may be contacted regarding questions about data protection and the assertion of data subject rights via datenschutz@felder-group.com.

The collection of data from other sources: categories of personal data

For each visit to our website, our system automatically gathers data and information from the user's computer system.

The following data is collected from this:

- Information about browser type and the version used
- The user's operating system
- The user's internet service provider



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- The user's IP address and the browser's session ID
- Date and time of access
- Data about the end device (device ID, screen resolution, language and country settings ...)
- Web pages visited by the user's system on our website
- Web pages called upon by the user's system on our website.

Storage period

Data required for the functionality of our website will only be processed and saved for the duration of your visit to our pages. Log data and IP addresses will generally be saved for 7 days in order to deter attacks against our systems. In order to provide information on data security issues and to assert any damage claims, this information will be saved until the final settlement of such.

Provision of data

There are no legal or contractual duties to provide data. This data is, however, necessary for the functionality of our website and our IT systems, which can otherwise potentially become compromised.

Further processing of your data for other purposes

Part of the data collected will be further processed for marketing purposes. We will inform you about this and your right to object at the time of the collection. We kindly ask that you refer to section 3 of the privacy statement.

2. Processing in connection with providing and rendering services, in particular to market our products and offer services (such as training)

Purposes of processing

We collect personal data to deliver our products and render our services. This includes the online shop and the use of third party services through business relationships.

Legal bases and legitimate interests

The legal bases for the processing of data are pre-contractual provisions or contractual duties (article 6, paragraph 1, lit. b of the GDPR), legal and regulatory duties (article 6, paragraph 1, lit. c of the GDPR, in particular taxation law), as well as the following (substantial) legitimate interests (article 6, paragraph 1, lit. f of the GDPR):

- The assertion or defence of legal claims, in particular for warranty and product liability reasons
- Reducing default risks (including those of third parties)
- To answer customer queries regarding products and services; the right to object at any time remains, unless this opposes a substantial interest (such as liability)
- efficient internal administration within the company / group



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Receivers or receiver categories and transfers to third countries or international organisations
In an emergency, personal data is transferred to the following receiver categories:

- Banks (to process payment flows)
- Legal representatives, courts if required
- Business trustees (for auditing purposes)
- The responsible administrative authorities, esp. financial authorities
- Collection agencies for debt recovery (abroad only to the extent the debt must be recovered abroad)
- External financiers such as leasing or factoring companies and concessionaires, to the extent the delivery or service is externally financed in this way
- Contract or business partners, who contribute or will contribute to the delivery or service (such as delivery companies)
- Insurance policies issuing from the conclusion of an insurance contract regarding the delivery/service or the advent of an insured event
- Authorities and institutions in order to create the legally required (official) statistics
- Customers (recipients of services)
- Credit agencies

Transfers to third countries or international organisations only take place in these instances, if on the basis of an adequacy decision according to article 45 of the GDPR or on the basis of the requirements of article 49, paragraph 1, lit. b, c or e of the GDPR (the requirement to conduct pre-contractual provisions upon request by the affected person or, in their interest, the assertion, execution or defence of legal claims) or on the basis of consent, in accordance with article 49, paragraph 1, lit. a of the GDPR.

We use the services of the following processors:

Google Analytics

Our site uses Google Analytics, a web based analysis service from Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. To deactivate Google Analytics, Google provides a browser plug-in at <http://tools.google.com/dlpage/gaoptout?hl=en>. Google Analytics uses Cookies. Cookies are small text files that allow us to store specific information regarding the user on their device while they use the website. This allows analysis of the use of our web page via Google. The information collected by the cookie about the use of our pages (including your IP address) is usually transferred to a Google server in the USA and stored there. We wish to make clear that Google Analytics has been extended on this website using the code 'gat._anonymizeIp();' in order to provide an anonymised record of IP addresses (known as IP masking). If anonymisation is active, Google abbreviates all IP addresses within European Union Member States or in other signatory countries to the EEA Agreement, so that no assumptions can be made about to your identity. In exceptional cases only, the full IP address is transmitted to a Google server in the USA and abbreviated there. Google complies with the data protection provisions of the «Privacy Shield» agreement. It is registered with the US Department of Trade's Privacy Shield programme and uses collected information to examine



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usage of our website, to compile reports for us in relation to this usage, and to provide us with other related services. You can find more information at <http://www.google.com/intl/de/analytics/privacyoverview.html>.

Clicky

This website uses the Clicky Web Analytics service to collect statistical data on the use of our web presence. To this end, visitor information is collected and transmitted to servers belonging to Roxr Software Ltd.

Users' website usage can be analysed using Clicky. To do this, so-called 'Cookies', text files saved on your computer which allow your use of the website to be analysed, are transmitted to Roxr Software Ltd. You can find out more about the purpose and scope of data collection and its further processing and use by Clicky in Roxr Software Limited's privacy notices, atclicky.com/help/faq/features/cookies#/terms.

LiveZilla

This website collects and stores anonymised data for the purposes of web analysis and in order to operate the Live Chat system for answering Live Support enquiries. This technology is provided by LiveZilla Ltd, Byk-Gulden-Strasse 18, 78224 Singen (www.livezilla.net). This anonymised data can be used to create pseudonym user profiles. Cookies can be used for this purpose. These are small text files which are saved locally on the website user's computer, thus (potentially) allowing the user to be recognised in the event of a repeat visit to our website. The pseudonymised user profiles will not be associated with personal data regarding the bearer of the pseudonym without the separate and explicit permission of the data subject. Technical measures are taken to ensure that IP addresses are anonymised automatically. You can prevent any form of web analysis by changing the appropriate settings on your browser (e.g. handling of Cookies).

The data controller, FELDER KG, is part of a group of companies. For internal economic administrative purposes, we therefore also manage data processing for the other companies within the group. Therefore, the group has a substantial legitimate interest (recital 48 of the GDPR).

All associated companies and processors may be contacted regarding questions and the assertion of data subject rights via dataprotection@felder-group.com

The collection of data from other sources: categories of personal data

Depending on the legitimate interest (value of the order, method of financing), we collect information about creditworthiness prior to accepting an order, as well as the following personal data.

In the online shop, cookies are used to operate the shopping basket and the order process.

Storage period

Until the termination of the business relationship or until the end of the guarantee, warranty, limitation and legal retention dates; moreover, until the termination of any legal disputes, which may require data as evidence. For as long as necessary in the case of services, where compensation claims are asserted, in accordance with the civil code or other titles (such as product liability).



Provision of data

The collection of essential data is necessary to conclude a contract.

Further processing of your data for other purposes

Part of the data collected will be further processed for marketing purposes. We will inform you about this and your right to object at the time of the collection. We kindly ask that you refer to section 3 of the privacy statement.

3. Processing for marketing (customer queries, customer service and advertising)

Purposes of processing

Customer service and marketing (direct advertising) for purposes of the controller or those mutually responsible, including from relevant newsletters, answering customer queries and sending advertisements in the post

Legal bases and legitimate interests

Legitimate interests on the basis of article 6, paragraph 1, lit. f of the GDPR:

- Advertisements for products and services offered by the company
- To acquire and retain customers (bonus scheme for regular customers)
- To improve the attractiveness of offers

Objection

You retain the right to make an informal objection at any time to the processing of data for these purposes and you may demand that we delete or restrict processing. We will inform you of your rights at the time of data collection.

Receivers or receiver categories and transfers to third countries or international organisations

In an emergency, personal data is transferred to the following receiver categories:

- Delivery services

We use the services of the following processors:

- Printers
- Newsletter service providers

The controller, FELDER KG, is part of a group of companies. For internal economic administrative purposes, we therefore also manage data processing for the other companies within the group. Therefore, the group has a substantial legitimate interest (recital 48 of the GDPR). Processing for marketing and customer retention measures solely takes place for the purposes stated by the control-



ler, with whom there exists a business relationship; processing for such company purposes assumes the prior consent of the data subject.

All associated companies and processors may be contacted regarding questions and the assertion of data subject rights via dataprotection@felder-group.com

The collection of data from other sources: categories of personal data

- The purchase of address data and collecting addresses

We use the services of the following processors:

Cookies

Our site uses Cookies. Cookies are small text files that allow us to store specific information about the user on their device while they use the website. Cookies allow us to determine the frequency of use and the number of page visitors, to analyse the behaviour of site users as well as making our site more user-friendly. Cookies are stored at the end of a browser session and can be reused the next time you visit a site. If you do not want your cookies to be stored, you can change your browser settings to refuse cookies.

Google Analytics

Our site uses Google Analytics, a web based analysis service from Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. To deactivate Google Analytics, Google provides a browser plug-in at <http://tools.google.com/dlpage/gaoptout?hl=en>. Google Analytics uses Cookies. Cookies are small text files that allow us to store specific information regarding the user on their device while they use the website. This allows analysis of the use of our web page via Google. The information collected by the cookie about the use of our pages (including your IP address) is usually transferred to a Google server in the USA and stored there. We wish to make clear that Google Analytics has been extended on this website using the code 'gat._anonymizeIp();' in order to provide an anonymised record of IP addresses (known as IP masking). If anonymisation is active, Google abbreviates all IP addresses within European Union Member States or in other signatory countries to the EEA Agreement, so that no assumptions can be made about your identity. In exceptional cases only, the full IP address is transmitted to a Google server in the USA and abbreviated there. Google complies with the data protection provisions of the «Privacy Shield» agreement. It is registered with the US Department of Trade's Privacy Shield programme and uses collected information to examine usage of our website, to compile reports for us in relation to this usage, and to provide us with other related services. You can find more information at <http://www.google.com/intl/de/analytics/privacyoverview.html>.

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LiveZilla

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Twitter

Our website uses functions from Twitter Inc., 1355 Market St, Suite 900, San Francisco, CA, 94103, USA. When retrieving our website using a Twitter plug-in, a connection is established between your browser and Twitter's servers. This results in data being transmitted to Twitter. If you have a Twitter account, such data can be linked to it. If you do not wish this data to be associated with your Twitter account, please log out of Twitter before visiting our website. Interactions, specifically clicking on the 'Re-Tweet' button, will also be forwarded to Twitter. You can find more information at <https://twitter.com/privacy>.

YouTube-Plugin

This internet site contains at least one YouTube plug-in. YouTube is owned by Google Inc., headquartered in San Bruno, California, USA. As soon as you visit one of our webpages equipped with a YouTube plug-in, a connection is established with YouTube's servers. This is used to inform the YouTube server of exactly which of our webpages you have visited. In addition, if you are logged into your YouTube account, this will allow YouTube to associate your browsing behaviour directly with your personal profile. You can disable the ability to associate your behaviour with your account by logging out of your account in advance. You can find more information on the collection and use of your data by YouTube in YouTube's privacy notices, at www.youtube.com.

The Pin it button on Pinterest

Our website has a 'Pin it' button for the social network Pinterest, which is operated by Pinterest Inc. - headquartered at 808 Brannan St, San Francisco, CA 94103, USA. Using the 'Pin it' button informs Pinterest that you have visited our webpages. If you are logged in to your Pinterest account at the same time, Pinterest can also associate your visit with your Pinterest account. Clicking on the 'Pin-it' button results in data being transmitted to Pinterest, which is then saved on servers (in the USA). If you wish to prevent this from happening, you must log out of your Pinterest account before clicking on the 'Pin-it' button. In order to protect your privacy, you can find out more details on data collection and the processing and use of your data by Pinterest, and on your legal rights and the settings available to you, in Pinterest's own privacy notices. You can access them by clicking here: <http://pinterest.com/about/privacy/>



Storage period

Data from interested parties and profiles on the online shops will be saved for 3 years from the date of the last contact with the customer. Addresses and email addresses will be saved for the duration of the advertising campaigns or until objection or unsubscription from a newsletter; moreover, data is saved if there is a request to restrict processing or if the processing is used for other purposes that require a longer duration (in particular, in accordance with section 2 of the privacy statement).

Provision of data

There is no obligation to provide data.

Further processing of your data for other purposes

For customer queries, depending on the type of query and the conduct of potential further processing in connection with deliveries and services, see the further details in section 2 of the privacy statement.

4. Public relations work

Purposes of processing

Provision of information regarding the controller's work and services in at least local or regional public interest.

Objection

You retain the right to make an informal objection at any time to the processing of data for these purposes and you may demand that we delete or restrict processing. We will inform you of your rights at the time of direct data collection and within the context of inviting you to events.

Legal bases and legitimate interests

The legal basis for processing is the freedom of expression, in accordance with articles 13, 17 and 17a of the Austrian constitution, as well as article 10 of the ECHR and, if published purposes are pursued, in accordance with article 85 of the GDPR in conjunction with section 9, paragraph 2 of the Data Protection Act (and for image data, section 12, paragraph 2 Z 4 of the Data Protection Act, if there is a substantial interest in the public display of major events in history); otherwise, the publication of image data will require the consent of the data subject (article 6, paragraph 1, lit. a of the GDPR / article 9, paragraph 2, lit. a of the GDPR).

Receivers or receiver categories and transfers to third countries or international organisations

No transfer receivers are intended, however publication is in the public interest and, insofar as this is available online, potentially accessible worldwide.

The data controller, FELDER KG, is part of a group of companies. For internal economic administrative purposes, we therefore also manage data processing for the other companies within the group. Therefore, the group has a substantial legitimate interest (recital 48 of the GDPR). Processing for



marketing and customer retention measures solely takes place for the purposes stated by the controller, with whom there exists a business relationship; processing for such company purposes assumes the prior consent of the data subject.

All associated companies and processors may be contacted regarding questions and the assertion of data subject rights via dataprotection@felder-group.com

Storage period

The storage period is limited to the same period as that for the data made and used for publishing purposes; depending on the interest in documentation, data may be permanently archived for later use (re-use) for the processing purposes described.

Provision of data

There is no duty to provide data.

Further processing of your data for other purposes

Data is only used for the intended purposes and, potentially for archiving purposes in the public interest, scientific, historic or research purposes or for statistical purposes, in accordance with article 5, paragraph 1, lit. b of the GDPR.

5. Data processing during application procedures

Purposes of processing

Time-limited record of personal data from unsolicited and solicited applicants, as well as for use in choosing an applicant and concluding a service contract.

Legal bases and legitimate interests

We process applicant data on the basis of article 6, paragraph 1, lit. b of the GDPR (pre-contractual provisions), as well as article 6, paragraph 1, lit. f of the GDPR, in order to contact applicants within the storage period and potentially, if in our interest or in the interests of a third party, to check their details if they are needed for a position requiring a higher level of confidentiality.

Receivers or receiver categories and transfers to third countries or international organisations

Your data will only be divulged to our employees if necessary. If references are provided, this may result in us contacting them. Similarly, in certain justified cases of substantial interest, your details may be checked by third parties (such as for checking stated qualifications and university degrees). Transfers to third countries or international organisations only take place in these instances, if on the basis of an adequacy decision according to article 45 of the GDPR or on the basis of the requirements of article 49, paragraph 1, lit. b of the GDPR (the requirement to conduct pre-contractual provisions upon request by the affected person) or on the basis of consent, in accordance with article 49, paragraph 1, lit. a of the GDPR.

The data controller, FELDER KG, is part of a group of companies. For internal economic administrative purposes, we therefore also manage data processing for the other companies within the group.



Therefore, the group has a substantial legitimate interest (recital 48 of the GDPR).

The collection of data from other sources: categories of personal data

During contact with the references you have provided, data and information about your previous business relationship or employment, as well as subjective evaluations of your work performance, may be obtained by the relevant third parties. (Storage of this data and information is not intended.)

Storage period

If you have applied for an advertised position, we will keep your personal data for a maximum of three years following the end of the application period, then it will be deleted. Furthermore, you can informally object to this within eight months of the end of the application period.

If you have submitted an unsolicited application, we will keep your documents for a maximum of three years, so that we can contact you regarding any suitable positions. However, you can informally object at any time.

Provision of data

In order to process applications, it is necessary for you to provide evidence of your qualifications and contact details. In certain cases, regardless of the requirements of the position, it may also be necessary to obtain further data from you (such as a criminal record). If you cannot provide the required data, then your application for the position cannot be considered.

Further processing of your data for other purposes

If you enter into employment, your application documents will be further used for human resource purposes, with the exception of special data that is worth protecting (such as a criminal record). All other information will be provided to you before concluding the contract

6. Communication

Purposes of processing

If you contact us by email, telephone or by using the form on our website, we will collect and process the data technically necessary for communication (depending on the chosen means of communication). This can include your telephone number, email address, the time (and potentially the duration) of the communication, etc. Incoming emails will also be processed through a spam filter, firewall, virus scanner, etc. in accordance with the purposes set out in section 1 of this statement.

Legal bases and legitimate interests

The data which you input will be processed for the purpose of answering your query on the basis of legitimate interests, as set out in article 6, paragraph 1, lit. f of the GDPR. Other processing purposes depend on the content of the communication and are covered by sections 1-6 of this privacy statement.



Objection

In accordance with processing for the purposes set out in article 6, paragraph 1, lit. e and f of the GDPR, you retain the right to make an informal objection at any time to the processing of data for these purposes and those arising from your particular situation and you may demand that we delete or restrict processing. We will inform you of your rights at the time of direct data collection (such as on the online form). This right does not apply if we process your query or communication for other reasons (such as contractual duties, legal duties and product liability) and if we have to store the communication for the relevant period of time stated in this privacy statement.

Receivers or receiver categories and transfers to third countries or international organisations
Depending on the purposes of communication, it may be necessary to conduct a relevant transfer, in accordance with sections 1 to 6 of this privacy statement.

The collection of data from other sources: categories of personal data
In every instance of contact, our systems gather data and information about the means of communication and the technical systems used by the data subject.
The following data is collected in this respect: the data subject's contact data (such as telephone number, email address, etc.), the time of the communication (date, time)

Storage period

The storage period depends on the time required to conclude communication on the issue raised; moreover, a longer storage period, regardless of the purpose of the communication, may be required, as stated in sections 1-6 of this privacy agreement.

Provision of data

There is no duty to provide data.

Further processing of your data for other purposes

Depending on the contents of your query or communication, further processing may take place for the purposes listed in sections 1 - 6 of this privacy agreement.