

# INFORMATION ON DATA PROTECTION

As the person whose personal data is being processed, you are the data subject. Below, we would like to inform you about the processing of your personal data and give you an overview of the accompanying rights.

We exclusively process your personal data in compliance with the regulations of the European General Data Protection Regulation (GDPR) and the Federal Data Protection Act (FDPA). In addition, we do not process more data than absolutely necessary and, if possible, anonymously.

## 1. Who is responsible and who can I contact?

We – VNG Handel & Vertrieb GmbH – process your personal data and are therefore controllers. You can reach us at the following address:

VNG Handel & Vertrieb GmbH  
Braunstraße 7  
04347 Leipzig

Telephone +49 341 443-1910

Fax +49 341 443-2912

**[kontakt@vng-handel.de](mailto:kontakt@vng-handel.de)**

If you have any questions about the information mentioned here, you can reach our occupational data protection officer with the following contact details:

VNG Handel & Vertrieb GmbH  
Data protection officer

Braunstraße 7  
04347 Leipzig

**[datenschutz@vng-handel.de](mailto:datenschutz@vng-handel.de)**

## 2. What personal data do we process?

We collect personal data from you in the scope of our business relations. In particular this includes: personal details (e.g. name, address, contact details, if necessary date and place of birth and nationality); company affiliation or association membership and role within the company or association; marketing attributes (such as allocation to marketing lists); advertising and sales data; data from the initiation or performance of a contract (e.g. the content of your request) audiovisual data (e.g. photos); documentation data (such as a protocol on consultations or similar documentation required to prove the conclusion of a contract); and other data comparable with the named categories.

### 3. Where we do we get this data from?

We process personal data which you provide us with in the course of our business relations. In addition, data of interested parties who contact us will be processed.

If necessary, we will also process data from publicly accessible sources, for example the commercial register and register of associations, land registries, record of debtors, the press or the internet.

We also process data that is permissibly made available to us by companies from our group or other third parties.

### 4. Why do we process your data and on what legal basis?

There are several bases for processing your personal data:

#### a) Initiation or performance of a contract (Art. 6(1)(b) GDPR)

In order to fulfil our contractual and non-contractual obligations to you, we must process your data. Data processing takes place for contract implementation and to carry out pre-contractual measures at the request of the interested party. The purposes are determined by the specific content of the respective contract. Therefore you can find further details on the relevant purposes of data processing in the contractual documents.

#### b) Your consent (Art. 6(1)(a) GDPR)

Your personal data is processed on the basis of your consent. Your data is exclusively processed within the scope of the consent provided, and only for the purposes that you consented to. Examples for those purposes are:

- information about and invitations to events,
- the sending of information material,
- management of memberships in associations and initiatives
- maintaining networks.

#### c) Legal obligation (Art. 6(1)(c) GDPR)

Processing your personal data is in the public interest or is carried out on the basis of legal requirements. We are subject to various legal obligations, for example the money laundering law or the tax laws. The purposes of processing include the fulfilment of tax law control and notification obligations, counter terrorism and fraud and money laundering prevention.

#### d) Legitimate Interests (Art. 6(1)(f) GDPR)

If necessary, we process your personal data beyond the actual fulfilment of contractual or legal obligations to safeguard legitimate interests of us or third parties. The reason for such processing is for example:

- preparation and usage of internal statistics,
- data processing and analysis for marketing purposes,
- strengthening the customer relationship, for example with customer surveys,
- improvement and further development of services and products,

- safeguard the operation and security of our IT systems and the further development of such measures,
- business and risk management,
- organization and execution of events,
- enforcement of legal claims and defense in legal disputes,
- prevention of and solving criminal offences,
- measures for building and plant security, for example access controls,
- measures to ensure domiciliary rights.

## 5. Who receives your data?

Within the company, only those bodies will be given access to your data who need it to fulfil our legal and contractual obligations.

Your personal data will also be passed on to service providers (above all processors) and vicarious agents. These are:

- IT supporters,
- balancing group management
- service providers for surveys,
- marketing service providers,
- advertising agencies,
- print and shipping service providers,
- service providers for the disposal of files and data carriers,
- consulting services,
- authorities,
- commercial agents,
- auditors,
- collection service providers and lawyers,
- insurances.

Such a transfer takes place on the basis of your consent, to carry out the contract or to comply with legal obligations.

Transfer of your personal data to bodies outside of the EU (e.g. for the purpose of development and operation of IT systems), or to international organizations, will only take place if the European Commission confirms that this center adheres to the European level of data protection. If such a confirmation is not provided, then we as controllers ensure via standard data protection clauses that, in the case of transfer, the European level of data protection is adhered to. You as data subject have the option to see these standard data protection clauses in electronic form [here](#). Alternatively, we will provide you with a copy on request.

## 6. How long will your data be saved?

We process and save your personal data for as long as the knowledge of the data is necessary for the purposes of the business relations, the purposes, they were collected for or for our contractual and legal obligations.

If the collection fulfilled the basic purpose, then the data will be regularly deleted, unless limited further processing is required. This includes, for example, the fulfilment of

commercial and tax law retention periods (German commercial code, regulation of taxation, anti-money laundering law – retention for up to ten years) and the maintenance of evidence in the scope of the legal statute of limitations regulations (up to 30 years – regular statute of limitations is three years).

## **7. What rights do you have as data subject?**

As data subject you have various rights:

- The right to information (Art. 15 GDPR)
- The right to amendment (Art. 16 GDPR)
- The right to deletion (Art. 17 GDPR)
- The right to the limitation of processing (Art. 18 GDPR)
- The right to data transferability (Art. 20 GDPR)
- The right to object (Art. 21 GDPR)
- The right to withdraw consent provided (Art. 7 para. 3 GDPR)
- The right to complain to a supervisory authority (Art. 77 GDPR)

Your rights are subject to some legal exceptions. For example, your rights are limited on the basis of research and statistics purposes (sect. 27 para. 2 FDPA) or due to archiving purposes in the public interest (sect. 28 para. 2 and 3 FDPA). Further exceptions are amongst others: sect. 34 and 35 FDPA and Art. 17 para. 3 GDPR.

You can find extensive information on your right to object in accordance with Art. 21 GDPR at the end of the section “Your rights to object”.

Furthermore, in the case that your personal data is collected on the basis of your consent, you have the right to withdraw this consent at any time. However, it should be noted that such a withdrawal is only effective in future, and the processing that has occurred until then remains lawful.

## **8. Are you obliged to provide us with your personal data?**

In the scope of our business relations, we require the data which is necessary for the acceptance and implementation of the contract and the fulfilment of the accompanying contractual obligations and the data which we are legally obliged to collect.

As a rule, without this data, we are not in a position to draw up a contract with you, to handle your request or to contact you.

## **9. Is there an automated decision?**

Ultimately, no automated decision takes place. If we do use such a procedure in exceptional cases, we will inform you separately in advance if this is legally required.

## **10. Information in the case of change of purpose**

If there is a change in the reason for processing your personal data, we will of course inform you immediately.

## 11. Can this information be changed?

As our data processing is subject to change, we will also adjust our data protection information from time to time. We will inform you of any changes in good time. You will find the current version of these data protection regulations here.

# YOUR RIGHTS TO OBJECT

## 1. Right to object relating to individual case

We have already informed you about the right to object in accordance with Art. 21 GDPR. Specifically, this means that you have the right to object to the processing of your personal data at any time, for reasons that arise from your particular situation. The requirement for this is that the data processing is in the public interest or is taking place on the basis of a weighing up of interests (Art. 6 para. 1 letter e or f GDPR). This also applies to corresponding profiling.

If you make an objection against the processing of your personal data, we will no longer process it. Unless we can prove necessary, legitimate reasons for processing that outweigh your interests, rights and freedoms, or the processing serves to enforce, practice or defend legal claims.

## 2. Right to object to processing for purposes of direct advertising

In accordance with Art. 21 para. 2 GDPR, you as data subject have a separate right to object if your personal data is used for direct advertising. This also applies for profiling if it is connection with direct advertising.

If you make use of this right to object, we as controllers will no longer process your data for this purpose.

## 3. Who should I send my objection to?

The objection does not require any particular form and, where possible, should be sent to:

VNG Handel & Vertrieb GmbH  
Braunstraße 7  
04347 Leipzig

Telephone: +49 341 443-1910  
Fax: +49 341 443-2912

**[kontakt@vng-handel.de](mailto:kontakt@vng-handel.de)**