

Overview of data protection for our business partners

In connection with our operational activities, we, Vinnolit GmbH & Co. KG, process personal data of our (potential) business partners and their employees.

The protection of personal data is important to us. We process personal data only in accordance with the applicable data protection requirements, in particular the General Data Protection Regulation (GDPR) and the Federal Data Protection Act (BDSG).

In the following you will find information about us and our data protection officer. In addition, we would like to give you an overview of the processing of your personal data and your rights with regard to processing.

For more information about the processing of your personal data and your rights in relation to such processing, please refer to our detailed data protection information on our website:

https://www.vinnolit.com/vinnolit.nsf/id/EN_General_Conditions_of_Use

Who is responsible for data processing?

Vinnolit GmbH & Co. KG
Carl-Zeiss-Ring 25
D-85737 Ismaning
+49 89 96103-0
info@vinnolit.com

How to reach our data protection officer?

Dr. Guy Gansfort
Vinnolit GmbH & Co. KG
Carl-Zeiss-Ring 25
85737 Ismaning
+49 (0) 89 96103-222
guy.gansfort@vinnolit.com

For what purposes and on what legal basis do we process personal data?

We process personal data of our (potential) business partners and their employees for the following purposes:

- Identification of potential business partners (leads) and initiation of business relationships, including establishing an initial contact with the aim of establishing a business relationship
- Identification of our business partners
- Carrying out a sanction list check to fulfil legal obligations
- Implementation of pre-contractual measures including pre-contractual communication and preparation of offers and cost estimates
- Assessing the creditworthiness of our customers and setting and monitoring credit limits for our customers
- Fulfilment of contracts with our business partners including contractual communication, exchange of services, invoicing and handling of payments
- Proper bookkeeping and storage for the fulfilment of contractual and legal, in particular commercial and tax law, storage obligations

- Transmission of information to our parent company in order to guarantee its fulfilment of legal obligations
- storage for evidentiary purposes for the possible assertion, exercise or defence of legal claims
- asserting, exercising or defending legal claims, including cooperation with external attorneys or assistance from other companies in our group of companies
- Cooperation with external tax advisors and/or auditors to fulfil legal obligations
- Cooperation with supervisory authorities, courts and other public bodies to fulfil legal obligations
- Business relationship management, including contacting our business partners for information and maintaining the relationship with our business partners, and tailoring our services to the needs and wishes of our business partners
- Data protection-compliant deletion, destruction or anonymization of personal data

Depending on the purpose of the processing, the following legal bases apply to the data processin:

- Art. 6 (1) (b) GDPR (Fulfilment of contracts with affected persons / Implementation of pre-contractual measures)
- Art. 6 (1) (c) GDPR (Fulfilment of legal obligations)
- Art. 6 (1) (f) GDPR (Protection of legitimate interests of us or of third parties under weighing of interests)
- Art. 6 (1) (a) DRPR (Consent)

Which personal data do we process?

We process the following categories of personal data, but of course only to the extent necessary for the purposes stated above:

- Lead data (e.g: Company, industry sector, name, function and business contact data of potential business partners)
- Master data (e.g: Company, industry sector, registration number, sales tax identification number and business identification number of business partners)
- Identification data (e.g: Information on the beneficial owner of our business partners)
- Contact data (e.g: Name, function and operational contact data of the contact persons at our business partners)
- Bank data (for example Account holder, bank institution, IBAN, BIC of our business partners)
- Communication data (e.g: Contents of business communication, circumstances of business communication)
- Credit assessment data (e.g. credit rating information provided by credit agencies)
- Contract data (such as Data from contract documents)
- Invoice data (such as Invoice date, invoice amounts, invoice items)
- Payment data (e.g: Payment date, payment amounts)
- Protocol data (e.g: Data from protocols about business contents of appointments and meetings)
- Analysis data (e.g: Data from analyses of the business structure of companies)
- Survey data (e.g: Responses to our voluntary business relationship assessment surveys)

Who receives personal data from us?

The following categories of recipients will receive personal data from us, but of course only to the extent necessary for the purposes mentioned above:

- Other companies in our Group (including in the USA) and our dependent subsidiaries (including in Russia)
- The Westlake Group, to which Vinnolit GmbH & Co. KG, is a globally active company headquartered in the USA. In order to meet the needs of its customers, many of whom are also international companies, the Westlake Group operates with a matrix organization and may require an exchange of information between various Westlake companies, in particular with the Westlake Chemicals Corporation headquarters in the USA. This exchange of information is legitimised by standard EU contractual clauses
- Companies cooperating with us outside our group of companies
- identification service provider
- shipping service provider
- Billing and payment processing service provider
- accounting service provider

- archiving service provider
- disposal service provider
- survey provider
- signature service provider
- credit bureaus
- Courts
- Lawyer
- tax consultant
- Auditors
- Supervisory authorities and other public bodies

How long do we store personal data?

We only store personal data for as long as it is necessary to achieve the above-mentioned purposes. Depending on the type of data, there may be legal storage obligations that make storage necessary, even if the actual processing purpose for which we have collected the data has already been fulfilled. For documents relevant under commercial and tax law, statutory retention periods of six or ten years typically apply (§ 147 of the German Tax Code (AO), § 257 of the German Commercial Code (HGB)).

What rights do you have with regard to the processing of your personal data?

As a data subject, you have the following rights with regard to the processing of your personal data:

- **Right to information (Art. 15 GDPR)**
The right to information about your personal data processed by us and about certain other information (such as those given in this privacy policy).
- **Right to rectification (Art. 16 GDPR)**
If your personal data is inaccurate or incomplete, you have the right to have it corrected.
- **Right to deletion ("Right to be forgotten") (Art. 17 GDPR)**
On the basis of the so-called "right to be forgotten", you can demand the deletion of your personal data, unless there is a duty to retain it. The right to deletion is not a right without exception. For example, we have the right to continue processing your personal data if such processing is necessary in order to comply with our legal obligations or to assert, exercise or defend legal claims.
- **Right to restrict processing (Art. 18 GDPR)**
This right includes the restriction of use or the manner of use. This right is limited to certain cases and exists in particular when: (a) the data is inaccurate; (b) the processing is unlawful and you refuse to delete it; (c) we no longer need the data, but you need the data to assert, exercise or defend legal claims. If processing is limited, we may continue to store the data, but may not use it. We maintain a list of those individuals who have exercised the right to limit the processing in order to ensure that this restriction is met.
- **Right to data portability (Art. 20 GDPR)**
This right includes that we transmit your personal data, if technically possible, in a structured, common and machine-readable format for your own purposes.
- **Right of opposition (Art. 21 GDPR)**
You may object to the processing of your personal data if it is processed on the basis of legitimate interests. As a data subject, you have the right to object at any time, on grounds arising from your particular situation, to the processing of personal data concerning you carried out pursuant to Article 6(1)(e) or (f) of the General Data Protection Regulation, including profiling based on these provision.
- **Right to revoke consents (Art. 7 (3) DS-GVO)**

- If the processing is based on a consent pursuant to Article 6(1)(a) or Article 9(2)(a) of GDPR, you as data subject have the right to withdraw your consent at any time pursuant to Article 7(3) of GDPR. The withdrawal of consent shall not affect the lawfulness of the processing carried out on the basis of the consent until revoked. We will inform you of this before giving your consent
- Right of appeal to a supervisory authority (Art. 77 GDPR)
As a data subject, you have the right to lodge a complaint with a supervisory authority under the conditions laid down in Article 77 of GDPR.

The supervisory authority responsible for us is:

Bayerisches Landesamt für Datenschutzaufsicht

Promenade 18

D-91522 Ansbach

+49 (0) 981/53-1300

poststelle@lda.bayern.de

Homepage: www.lda.bayern.de