

## **Transparency and information obligations under the EU GDPR**

This document provides information on how your personal data are processed by Ziehm Imaging GmbH and what rights you have under data protection law.

### **1. Body responsible / data protection**

Ziehm Imaging GmbH  
Lina-Ammon-Str. 10  
90471 Nuremberg / Germany  
Tel.: +49 911 66067 0  
[info@ziehm.com](mailto:info@ziehm.com)  
[www.ziehm.com](http://www.ziehm.com)

Data protection contact: [web-datenschutz@ziehm.com](mailto:web-datenschutz@ziehm.com)

### **2. Categories / origin of the data**

We process the following personal data as part of the contractual relationship and for the initiation of the contract:

- Contact details (e.g. first and last names of the current and, if applicable, previous contact persons as well as name affixes, company name and address of the contractual partner (employer), telephone number with extension, business e-mail address, fax number)
- Job-related data (e.g. function in the company, department)
- If applicable, bank details (in the case of a SEPA direct debit mandate also the first name/surname of the account holder)

We generally receive your personal data from you as part of the contract initiation process or during the ongoing contractual relationship. In exceptional cases, your personal data will also be collected by other bodies. This includes ad hoc queries for relevant information from credit agencies, in particular on creditworthiness and credit behavior.

### **3. Purposes and legal bases for data processing**

Your personal data are processed in accordance with the provisions of the EU GDPR, the German Data Protection Act (BDSG) in its new version and all other relevant legal regulations.

Your personal data will be processed exclusively for the performance of pre-contractual measures (e.g. for the preparation of contracts, offers for products or services) and for the fulfillment of contractual obligations (e.g. for the performance of our services, the delivery contract or for order / job / payment processing) in accordance with Art. 6 Para. 1 lit. b EU GDPR or if there is a legal obligation to process (e.g. owing to tax law requirements) (Art. 6 Para. 1 lit. c EU GDPR). The personal data were originally collected for these purposes.

A data protection permission requirement can of course also represent your consent to data processing (Art. 6 Para. 1 lit. a EU GDPR). Before you give your consent, we will inform you about the purpose of the data processing and about your right of revocation in accordance with Art. 7 Para. 3 EU GDPR. If the consent also relates to the processing of special categories of personal data in accordance with Art. 9 EU GDPR, we will expressly inform you of this in advance.

We are also interested in maintaining a customer relationship with you and sending you information and offers relating to our products/services by e-mail. We therefore process your data in order to send you the relevant information and offers (Art. 6 Para. 1 lit. f EU GDPR).

Your personal data will only be processed for the detection of criminal offenses under the conditions of Art. 10 EU GDPR.

#### **4. Automated analysis of emails (e.g., AI-supported systems)**

We use partially automated processes (e.g., AI-supported analyses) to process incoming emails and inquiries. This serves to assign, process, and respond to inquiries more efficiently and to improve our customer and applicant services.

In particular, we process communication content and contact details.

Processing is carried out on the basis of Art. 6 (1) lit. f GDPR (legitimate interest in the efficient and high-quality processing of inquiries) or Art. 6 (1) lit. b GDPR, insofar as processing is necessary for the initiation or performance of a contract.

The partially automated analysis of incoming emails is necessary for efficient processing, is expected by the data subjects, and does not involve any significant interference. The legitimate interests of the data subjects therefore do not outweigh this. The supportive, partially automated analysis of applications serves the purpose of efficient processing, is expected by applicants, and does not significantly interfere with their rights, as no automated selection decisions are made.

There is no exclusively automated decision-making within the meaning of Art. 22 GDPR."

#### **5. Storage period of the data**

As soon as your data are no longer required for the above-mentioned purposes or you have withdrawn your consent, they will be deleted by us. Data will only be stored beyond the end of the contractual relationship in cases where we are obliged or entitled to do so. Regulations that oblige us to retain data can be found, for example, in the German Commercial Code or the German Fiscal Code. We may be authorized to do this, for example, on the basis of our contract or in accordance with Article 18 EU GDPR. Statutory limitation periods must also be observed.

## **6. Recipients of the data / categories of recipient**

Within our company, we ensure that your data are received only by those departments and persons who need them to fulfill our contractual and legal obligations.

In certain cases, service providers assist our departments in carrying out their tasks. The necessary data protection agreements (e.g. commissioned data processing agreement) have been concluded with these service providers. These are service providers in the areas of IT, shipping & logistics, data destruction and credit agencies, in particular when it comes to creditworthiness and credit behavior.

In addition, in cases prescribed by law, we are obliged to transmit certain information to public bodies such as tax authorities, law enforcement agencies and customs authorities.

## **7. Third country transfer**

Data are transferred to third countries (outside the European Union or European Economic Area) only if this is necessary to fulfill the business or contractual relationship, is prescribed by law or if you have given us your consent.

We transfer your personal data to service providers in the USA (Microsoft Corporation, salesforce.com inc.). These service providers ensure compliance with the special requirements of Art. 44 et seq. EU GDPR.

## **8. Rights of the data subjects**

Your rights as a data subject are set out in Articles 15 to 22 EU GDPR.

They comprise:

- The right of access by the data subject (Article 15 EU GDPR)
- The right to rectification (Article 16 EU GDPR)
- The right to erasure (Article 17 EU GDPR)
- The right to restriction of processing (Article 18 EU GDPR)
- The right to object to processing (Article 21 EU GDPR)
- The right to data portability (Article 20 EU GDPR)

If you wish to exercise these rights, please contact:

[web-datenschutz@ziehm.com](mailto:web-datenschutz@ziehm.com).

You can also contact us if you have questions about data processing at our company or wish to revoke any consent you have given us. You can also lodge a complaint against the data processing with a data protection supervisory authority.

**If we process your data to safeguard legitimate interests, you have the right, on grounds relating to your particular situation, to object to this processing, including profiling based on these provisions, at any time.**

**We will no longer process your personal data unless we are able to demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or processing of the data is required for establishing, exercising or defending legal claims.**

**If we process your personal data for the purpose of direct marketing, you have**

**the right to object without giving reasons; this also applies to profiling insofar as it is associated with such direct marketing. If you object to processing for direct advertising purposes, we will no longer process your personal data for such purposes.**

#### **9. Obligation to provide data**

You are obliged to provide certain personal data in order to enter into or process a contractual relationship. This is necessary in order to establish, execute and terminate the contractual relationship and to meet the associated contractual and legal obligations. It is not possible to execute the contract without providing these data.

#### **10. Automated individual decision-making**

We do not use purely automated processing procedures to reach a decision.