



Privacy Policy

The following text is to inform you about the processing of your personal data by us as part of our website service.

I. Responsible Entity

NIRONIT Edelstahlhandel GmbH & Co. KG

Am Oheberg 8, 21224 Rosengarten
Amtsgericht (Local Court) Tostedt HRB Nr. 5290

Fully liable partner:
NIRONIT Beteiligungsgesellschaft mbH
Managing Director: Thomas Meyer
E-mail: info@nironit.de

Contact DATA PROTECTION OFFICER

datasecurity@nironit.de

II. When do we process what personal data?

We process personal data from you under the following circumstances:

- a. If you visit our website, the browser used on your device automatically sends information to our website server. This information is temporarily stored in a so-called log file. The following information will be collected without your intervention and stored until its automated deletion:
 - the IP address of the accessing computer,
 - date and time of access,
 - name and URL of the retrieved file,
 - the website from which access was made (referrer URL),
 - the browser used and, if applicable, the operating system of your computer and the name of your access provider.

In addition, we use cookies and analysis services when our website is visited. You can find more information under „Analysis Tools“.

- b. If you have any questions, you can contact us via a form on our website. To use the form, you must provide a valid e-mail address so that we know who the request came from and to answer it. Additional information can be provided voluntarily.

- c. If you want to send us an application for an advertised position or to make an unsolicited application, we will process the documents and personal data you submit to us.

For unsolicited applications we need your name, address and other contact details, date and place of birth, nationality, and qualifications documents. In addition, you can also provide us with other voluntary information that you think would be beneficial in creating an employment relationship.

- d. Registering for our newsletter - When you sign up for our newsletter, we will collect your e-mail address, surname, first name, company, position, and city. The data provided by you will be processed.
- e. We offer you the opportunity to register on our site. The data entered in the course of this registration, which can be seen from the input fields in the registration form, are: e-mail address, surname, first name, company, position, and city. These are collected and stored solely for utilizing our offer. When you register on our site, we will also store your IP address and the date and time of your registration.

III. Purposes of data processing

We use the personal information that you have actively provided only for the purpose agreed and only to the extent required.

- a. The data mentioned are processed by us for the following purposes:
- to ensure a smooth connection of the website,
 - to ensure comfortable use of our website,
 - to evaluate system security and stability, and
 - for other administrative purposes.

The legal basis for data processing is Art. 6 para. 1 (f) of the EU's General Data Protection Regulation (GDPR). Our legitimate interest follows from the data collection purposes listed above. We do not use the collected data for drawing conclusions about you under any circumstances.

- b. The data processing for contacting us is in accordance with Art. 6 para. 1 (b) GDPR on the basis of a precontractual measure. When it comes to a contract, the data can be included in our customer care system. The data is not processed for any other purpose.

- c. The data processing is used for establishing and implementing an employment relationship in accordance with Art. 88 GDPR in conjunction with Section 26 of the German Federal Data Protection Act (BDSG). If there is a positive decision, the personal data will be included in our personnel file and will follow the purposes of the „employee management“ procedure.
- d. We will use your e-mail address to send you our newsletter on a regular basis, if you have expressly consented to this in accordance with Art. 6 para. 1 (a) GDPR.

IV. Categories of recipients of personal data

A transfer of your personal data to third parties for purposes other than those listed below will be made to the following categories of recipients:

- Companies that help us assess your creditworthiness (credit-rating agencies)

We only share your personal information with third parties if:

- you have given your express consent to this in accordance with Art. 6 para. 1 (a) GDPR,
- disclosure is required, in accordance with Art. 6 para. 1 (f) GDPR, to assert, exercise or defend legal claims and there is no reason to assume that you have a prevailing legitimate interest in not disclosing your data,
- disclosure is a legal obligation, in accordance with Art. 6 para. 1 (c) GDPR, and
- this is legally permissible and is required for the execution of contractual relationships with you, in accordance with Art. 6 para. 1 (b) GDPR.

A data transfer to third countries only takes place if you have given us your consent.

V. Duration, for which personal data ist stored

- a. Cookies are stored in your browser as so-called session cookies, so that your browser automatically deletes them after leaving the website. The duration of storage in this case depends on the technical functionality of the browser you are using.
- b. Personal data transmitted to us in connection with a contact request on our website will only be stored for the duration of the processing of the request. In the case of a contract, the data you provide can be stored in our customer

care system for 10 years as a matter of routine, unless there is another legal obligation that obliges us to retain it for a longer period.

- c. The collected personal data will, in the case of a
 - a) Rejection: be saved for at least three months. On the other hand, the longest storage period is six months at most.
 - b) Recruitment: our retention periods apply. The information pertaining to you will be provided to you upon your recruitment.
- d. The personal data you have provided will be stored until revocation.

Personal data transmitted to us in connection with a registration on our website will only be stored for the duration of the existence of the account. In the case of a contract, the data you provide can be stored in our customer care system for 10 years as a matter of routine, unless there is another legal obligation that obliges us to retain it for a longer period.

Please note that we will delete your data if their storage is inadmissible (especially if the data is incorrect and a correction is not possible). Deletion will be replaced by blocking if legal or actual obstacles prevent this (for example, special retention requirements based on commercial and tax regulations).

VI. Right to object

If your personal data are processed in accordance with legitimate interests under Art. 6 para. 1 (f) GDPR, you have the right under Art. 21 GDPR to submit an objection against the processing of your personal data, if there are reasons for this arising from your particular situation or the objection is directed against direct mail. In the latter case, you have a general right of objection, which will be implemented by us without the need to specify a particular situation.

If you would like to exercise your right of revocation or objection, please send an e-mail to datasecurity@nironit.de.

VII. Right to information, correction, deletion, restriction

The data subject is entitled to have access to the personal data concerned and to rectification, erasure, or restriction of processing. Furthermore, the data subject has a right to object to processing.

VIII. Right to data portability

The data subject has the right to data portability.

IX. Option to complain to the regulatory authority

You have the right to complain to the regulatory authority.

X. Provision of personal data

There is no statutory obligation for you to provide personal data.

There is no contractual obligation to provide us with personal data as part of our business activities. You are welcome to anonymize them or otherwise remove their personal relevance.

XI. Automated decision making, including profiling

Automated profiling may be used, under certain circumstances, with the aim of evaluating personal aspects. We use these profiling measures in the following cases:

Due to statutory and regulatory requirements, we are obliged to combat money laundering, the financing of terrorism and property-related crimes. At the same time, data evaluations (including comparison with legally prescribed lists) are carried out.

XII. Analysis tools

We use cookies on our site. These are small files that your browser automatically creates and stores on your device (laptop, tablet, smartphone, etc.) when you visit our site. Cookies do not harm your device; they do not contain viruses, Trojans, or other malicious software.

The cookie stores information, which always relates to the specific device used. However, this does not mean that this provides us with immediate knowledge of your identity.

On the one hand, the use of cookies helps to make the use of our website more enjoyable for you. For example, we use so-called session cookies to recognize that you have already visited individual pages on our website. These are automatically

deleted when you leave our site.

In addition, we also use temporary cookies, that are stored on your device for a specified period, to improve usability. If you make a repeat visit to our site to take advantage of our services, it will automatically recognize that you have already been with us and what inputs and settings you have made, so you do not have to re-enter them.

On the other hand, we use cookies to make a statistical record of the use of our website and to evaluate it for the purpose of optimizing our services. These cookies enable us to automatically recognize when you return to our site, that you have visited us before. These cookies are automatically deleted after a defined period of time.

The data processed by cookies is required for the above-mentioned purposes in order to protect our legitimate interests and those of third parties in accordance with to Art. 6 para. 1 (f) GDPR.

Most browsers accept cookies automatically. However, you can configure your browser so that no cookies are stored in your computer or to notify you before a new cookie is installed. However, the complete deactivation of cookies may result in you not being able to use all the functions of our website.

1. Analyzing tools

a) Tracking tools

The tracking measures listed below and used by us are used on the basis of Art. 6 para. 1 (f) GDPR. We want to ensure that our website is designed to meet requirements and is continually optimized, through the use of these tracking measures. On the other hand, we use the tracking measures to statistically record and evaluate the use of our website in order to optimize it. These interests are to be regarded as legitimate within the meaning of the aforementioned provision. The respective data processing purposes and data categories can be found in the corresponding tracking tools.

1. Google Analytics

We use Google Analytics, a web analysis service provided by Google (<https://www.google.de/intl/de/about/>) (Google Ireland Limited Gordon House, Barrow Street, Dublin 4, Irland; hereinafter „Google“) for the demand-oriented design and continuous optimization of our pages.
Pseudonymized user

profiles and cookies (see Clause 4) are created and used as part of this process. The information generated by the cookie about your use of this website, such as

- browser-type/-version,
- operating system used,
- referrer URL (the site visited immediately before our site),
- host name of the accessing computer (IP address),
- time of the server request,

is transmitted to a Google server in the USA and stored there. The information is used to evaluate the use of the website, to compile reports on the website activities, and to provide further services associated with the use of the website and the Internet for the purposes of market research and demand-oriented design of these Internet pages. This information may also be transferred to third parties if this is required by law or if third parties process this data on behalf of the company. Under no circumstances will your IP address be merged with other data from Google. The IP addresses are anonymized so that no assignment is possible (IP masking).

You can refuse the installation of cookies through an appropriate setting in your browser software. However please note that if you do this, you may not be able to use all of the functions of the website to the full.

You can also prevent the collection of data generated by the cookie and related to your use of the website (including your IP address) and the processing of this data by Google by downloading and installing a browser add-on (<https://tools.google.com/dlpage/gaoptout?hl=en>).

Google also offers a deactivation option for the most popular browsers, giving you more control over what information Google collects and processes. If you activate this option, no information about your visit to the website will be transmitted to Google Analytics. However, activation does not prevent information from being transmitted to us or to other web analytics services that we may use. For more information about the opt-out option provided by Google and how to enable this option, please follow the link below: <https://tools.google.com/dlpage/gaoptout?hl=en>.

As an alternative to the browser add-on, especially for browsers on mobile devices, you can also prevent Google Analytics from collecting data by clicking on this link. An opt-out cookie is installed to prevent future collection of your data when you visit this website. The opt-out cookie is stored

on your device and is only valid in this browser and only for our website. If you delete the cookies in this browser, you must re-install the opt-out cookie.

II. Google Adwords Conversion Tracking

We also use Google Conversion Tracking to statistically record and evaluate the use of our website in order to optimize it for you. Google Adwords will install a cookie (see Clause 4) on your computer, if you have accessed our website via a Google ad. These cookies expire after 30 days and are not used for personal identification. If the user visits certain pages of the Adwords customer's website, and the cookie has not yet expired, Google and the customer can recognize that the user has clicked on the ad and has been redirected to this page. Each AdWords customer receives a different cookie. Therefore, cookies cannot be traced through the websites of AdWords customers. The information collected using the conversion cookie is used to generate conversion statistics for AdWords customers who have opted for conversion tracking. AdWords customers see the total number of users who clicked on their ad and were redirected to a page with a conversion tracking tag. However, they will not receive any information that personally identifies users. If you do not wish to participate in the tracking process, you can also reject the installation of the cookie required for this - for example by using a browser setting that generally disables the automatic setting of cookies. You can also disable cookies for conversion tracking by setting your browser to block cookies from the „http://www.googleadservices.com/“ domain. Google's privacy policy for conversion tracking can be found here <https://services.google.com/sitestats/en.html>.

III. The use of reCAPTCHA

To protect input forms on our site, we use the „reCAPTCHA“ service produced by Google Ireland Limited Gordon House, Barrow Street, Dublin 4, Irland, hereinafter „Google“. The use of this service enables us to distinguish whether a specific input is of human origin or is abusive input performed by automated machine processing.

To the best of our knowledge, the referrer URL, IP address, behavior of website visitors, information about the operating system, browser and dwell time, cookies, display instructions and scripts, the user's input behavior, and mouse movements in the „reCAPTCHA“ checkbox area are transmitted to

„Google“.

Google uses the information obtained in this way, inter alia, to digitize books and other printed matter and to optimize services such as Google Street View and Google Maps (e.g. house number and street name recognition).

The IP address transmitted within the scope of „reCAPTCHA“ will not be merged with other Google data unless you are logged in to your Google account at the time you use the „reCAPTCHA“ plug-in. If you want to prevent this transmission and storage of data about you and your behavior on our website by „Google“, you must log out of „Google“ before you visit our site or use the reCAPTCHA plug-in.

The use of the information obtained through the use of the „reCAPTCHA“ service is in accordance with Google’s Terms of Use: <https://policies.google.com/privacy?hl=en>.

IV. Google Fonts

We use „Google Fonts“ on our website. These are fonts produced by Google Ireland Limited Gordon House, Barrow Street, Dublin 4, Irland - „Goog-le“). We do this in order to be able to publish our website as smoothly and clearly as possible.

A connection is established between your browser and Google’s server to achieve the display. This connection contains your IP address. The legal basis for these processing procedures is Art. 6 para. 1 (f) GDPR, on which we justify our legitimate interest in a uniform presentation.

You can find out how to opt out of this process at: <https://adssettings.google.com/authenticated>. You can also send us your objection at any time.

For more information about Google’s privacy policy, please visit: <https://www.google.com/policies/privacy/>.

b) Social Media Plug-ins

We use social plug-ins of the social networks Facebook, Twitter, and Instagram on our website on the basis of Art. 6 par. 1 (f) GDPR in order to make

our offices better known. The underlying advertising aim is to be regarded as a legitimate interest within the meaning of the GDPR. The responsibility for data protection-compliant operation must be guaranteed by the respective provider. The integration of these plug-ins by us uses the so-called two-click method as the best way possible to protect visitors to our web page.

I. Google Maps Privacy Policy

This website uses Google Maps, a Google Inc. product. By using this website, you consent to the collection, processing, and use of data collected automatically by Google Inc, its representatives, and third parties.

The use of „Google Maps“ and the information obtained via „Google Maps“ is subject to the Google Terms of Service <https://policies.google.com/terms>.

And the additional Terms of Service for “Google Maps” https://www.google.com/intl/en_us/help/terms_maps.html.

II. Xing

We use components of the XING.com network on our site. These components are a service provided by XING AG, Dammtorstraße 29-32, 20354 Hamburg, Germany. Every time you access our website equipped with such a component, this component causes the browser you use to download a corresponding representation of the XING component.

So far as we are aware, XING does not store any personal data of users who access our website. Likewise, XING does not store any IP addresses. In addition, no evaluation of usage behavior takes place via the use of cookies in connection with the „XING Share Button“. You can find further information about this in the XING share button privacy policy at: https://www.xing.com/app/share?op=data_protection

III. LinkedIn

We use components of the LinkedIn network on our site. LinkedIn is a service provided by the LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA. Every time you access our website equipped with such a component, this component causes the browser you use to download a corresponding representation of the LinkedIn component.

This process informs LinkedIn which specific page of our website is currently being visited. If you click the LinkedIn „Recommend-Button“ while

logged into your LinkedIn account, you can link the contents of our pages in your LinkedIn profile. This enables LinkedIn to assign the visit to our pages to your LinkedIn user account.

We have no influence on the data LinkedIn collects through this, nor on the extent of the data collected by LinkedIn. We also have no knowledge of the content of the data transmitted to LinkedIn. Details regarding the collection of data by LinkedIn as well as your rights and setting options can be found in LinkedIn's privacy policy. You can find this policy at: <https://www.linkedin.com/legal/privacy-policy>.

IV. WhatsApp

If you contact us via the instant messaging service WhatsApp, you automatically provide us with your telephone number. We can also see your WhatsApp nickname.

Please note that the confidentiality and data security of instant messaging services is not guaranteed. By installing and using WhatsApp on your smartphone or mobile device, you agree to the WhatsApp Terms and Conditions, which are beyond our control. Among other things, these include granting WhatsApp Inc. access to your telephone number and the contacts stored on your mobile device. Similarly, data is stored on WhatsApp Inc servers that are not subject to European data protection law. We are not liable for damages resulting from the use of the corresponding platforms.

By actively contacting us, you consent to the use and storage of your telephone numbers. The telephone numbers will only be used to provide the described/subscribed WhatsApp service. Your data will not be passed on.

The duration of the data storage corresponds to the period of use of the WhatsApp service. You can cancel the storage of your numbers at any time. To do this, send a WhatsApp message with an unambiguous text - your data will usually be deleted within 48 hours at the latest - the relevant contacts will also be deleted.

XIII. Data security

We use the most common SSL (Secure Socket Layer) method coupled with the highest level of encryption supported by your browser for connections to our website. This usually utilizes a 256-bit encryption. If your browser does not support 256-bit encryption, we use 128-bit v3 technology instead. You can see if a single

page of our website is transmitted in encrypted form by the closed display of a key or lock symbol in the lower status bar of your browser.

We also use suitable technical and organizational security measures to protect your data against accidental or intentional manipulation, partial or complete loss, or destruction or unauthorized access by third parties. Our security measures are continuously improved in line with technological developments.

XIV. Updates and changes to this privacy policy

This privacy policy is currently valid with effect from May 2018. It may become necessary to amend this privacy policy due to the further development of our website and the offers it contains, or to changed legal or official requirements. You can call up and print out the current data protection declaration at any time on the website.

Status: May 2018