

Privacy Policy in accordance with the GDPR

I. Name and address of the controller

In accordance with the General Data Protection Regulation and other national data protection laws of the member states as well as other data protection regulations, the controller is:

Schramm GmbH
Flinschstrasse 18a
60388 Frankfurt am Main
Germany
Tel.: +49 69 42007 0
Email: datenschutz@schramm-gmbh.de
Website: www.schramm-gmbh.de

II. Name and address of the Data Protection Officer

The Data Protection Officer of the controller is:

Aysegül Kalkan
c/o GenoTec GmbH
Wilhelm-Haas-Platz
63263 Neu-Isenburg
Tel.: +49 69 6978 3324
Mobile: +49 172 2677142
Email: ayseguel.kalkan@geno-tec.de

III. General information about data processing

1. Scope of personal data processing

In general, we collect and use the personal data of our customers only to the extent necessary to provide a functional website and to provide our content and services. We only regularly collect and use the personal data of our users with their consent. An exception applies in such cases in which the data subject is not able to give prior consent for practical reasons and it is legally permissible to process the data due to statutory regulations.

2. Legal basis for personal data processing

If the data subject provides consent for the processing of their personal data, Article 6(1)(a) of the EU Data Protection Regulation (GDPR) serves as the legal basis. Article 6(1)(b) GDPR also serves as a legal basis where the processing of personal data pertaining to the contracting party, which is also the data subject, is necessary in order to fulfil a contract. This also applies to processing operations which are required to conduct any pre-contractual measures.

Article 6(1)(c) GDPR serves as the legal basis insofar as processing personal data is required in order to fulfil a legal obligation that our company is subject to. Where the vital interests of the data subject or another natural person require personal data to be processed, Article 6(1)(f) GDPR is the legal basis.

Where processing is necessary for the purpose of a legitimate interest pursued by our company or by a third party and this interest is not overridden by the interests or fundamental rights and freedoms of the data subject, Article 6(1)(f) GDPR provides the legal basis for the processing.

3. Data erasure and retention period

The personal data of the data subject shall be deleted or blocked as soon as the purpose for storage ceases to apply. In addition, data may be stored if the European or national legislator has stipulated this in EU regulations, laws or other provisions, which apply to the controller. Data shall also be blocked or deleted if the retention period prescribed through the above-mentioned rules expires, unless the data must be stored for a longer period for the purpose of concluding or fulfilling a contract.

IV. Provision of the website and creation of log files

1. Description and scope of data processing

Each time our website is accessed, our system provider, STRATO, automatically collects data and information from the computer system of the calling computer.

The following data is collected here:

1. Information about the browser type and version used
2. The internet service provider of the user
3. The IP address of the user
4. Date and time of access
5. Information about the access rate, page views and sessions
6. Websites from which the user's system accesses our website

The data is stored in log files. The data is not stored with other personal data of the user.

2. Legal basis for data processing

The legal basis for the temporary storage of data and log files is Article (6)(1)(f) GDPR.

3. Purpose of data processing

It is necessary for the system to store the IP address temporarily to allow time for the website to be delivered to the user's computer. For this reason, the user's IP address must be stored for at least the duration of the session.

In addition, the data is intended to optimise the website and to ensure IT systems remain secure. The data is not evaluated for marketing purposes in this context.

For this purpose, our legitimate interest also lies in data processing in accordance with Article 6(1)(f) GDPR.

4. Data retention period

The data shall be deleted as soon as they are no longer required for the purpose for which they are being collected. The data may be stored in log files for a maximum of seven days. It is possible to extend the retention period. In this case, the user's IP addresses are deleted or distorted, so that they can no longer be allocated to the calling client.

5. Objection and disposal

Collecting data for the provision of the website and the retention of data in log files is imperative for the operation and security of the website. It is therefore not possible for the user to object.

V. Contact form and email contact

1. Description and scope of data processing

Contact can be made via the email address provided. When submitting data via email, the personal data of the user is stored.

In this context, data shall not be disclosed to third parties. The data is used exclusively for processing the conversation. Please note that in the case of email correspondence, ordinary emails sent via the Internet are neither confidential nor secure, and can be viewed, intercepted, altered or even lost by third parties. For these reasons, personal or confidential information should never be sent in ordinary emails. If in doubt, please contact us by post or call us.

2. Legal basis for data processing

The legal basis for data processing with the consent of the user is of Article 6(1)(a) GDPR.

The legal basis for the processing of data transmitted by email is Article 6(1)(f) GDPR. If the aim of the email is to conclude a contract, then the additional basis for the processing is Article 6(1)(b) GDPR.

3. Purpose of data processing

In the event of making contact via email, the necessary legitimate interest in the processing of data also applies.

4. Data retention period

The data is deleted as soon as it is no longer required for the purpose for which it is being collected. This applies to personal data sent via email if the conversation with the user has come to an end. The conversation is deemed to have come to an end if the circumstances indicate that the relevant issues have been clarified.

5. Objection and disposal

The user can revoke their consent to the processing of personal data at any time. If the user contacts us by email, they may object to the storage of their personal data at any time. In such a case, the conversation cannot be continued.

VI. Rights of the data subject

If your personal data is processed, you are deemed to be the data subject under the terms of GDPR and you are entitled to the following rights in respect of the controller:

1. Right to be informed

You may ask the controller to confirm whether we process any personal data relating to you.

If your data is being processed, you can request the information from the controller regarding the following points:

- (1) the purposes for the processing of the personal data;
- (2) the categories of personal data being processed;
- (3) the recipients or categories of recipients to whom the personal data relating to you has been disclosed or will be disclosed;
- (4) the planned retention period for the personal data relating to you, or, if specific information is not available, criteria for determining the duration of its retention;
- (5) the existence of a right to rectification or erasure of personal data relating to you, a right to obtain restriction of processing from the controller or a right to object to such processing;
- (6) the existence of a right to appeal to a supervisory authority;
- (7) all information available regarding the source from which the data originates, if the data is not collected from the data subject;
- (8) the existence of automated decision-making including profiling under Article 22(1) and (4) GDPR and, at least in these cases, meaningful information about the logic involved, as well as the scope and the intended consequences of such processing for the data subject.

You have the right to request information as to whether any personal data relating you is transmitted to a third party country or to an international organisation. In this context, you can request to be informed regarding the relevant safeguards pursuant to Article 46 GDPR in respect of the transfer.

2. Right to rectification

You have the right to obtain rectification and/or completion from the controller, if the personal data processed and relating to you is incorrect or incomplete. The controller must make any necessary corrections without delay.

3. Right to restrict processing

You may request the restriction of the processing of your personal data under the following conditions:

- (1) if you contest the accuracy of the personal data subject for a period of time which would enable the controller to verify the accuracy of the personal data;
- (2) the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- (3) the controller no longer needs the personal data for the purposes of the processing, but you require them for the assertion, exercise or defence of legal claims, or
- (4) if you objected to the processing pursuant to Article 21(1) GDPR and it is not yet certain whether the legitimate grounds of the controller override yours.

Where processing of your personal data has been restricted, such personal data shall, with the exception of their storage, only be processed with your consent or for the assertion, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest in respect of the Union or of a Member State.

Where the limitation of the processing has been restricted in accordance with the above-mentioned conditions, you shall be informed by the controller before the restriction is lifted.

4. Right to erasure

a) Obligation to erase

You shall have the right to request from the controller that the personal data relating to you be erased without undue delay and the controller shall be obliged to erase the personal data when one of the following grounds applies:

- (1) The personal data is no longer necessary for the purposes for which it was collected or otherwise processed.
- (2) You revoke your consent, upon which processing had been based in accordance with Article 6(1)(a) or Article 9(2)(a) GDPR, and there is no other legal ground for the processing.
- (3) You object to processing in accordance with Article 21(1) GDPR and there are no overriding legitimate grounds for the processing, or you object to processing in accordance with Article 21(2) GDPR.

- (4) The personal data relating to you has been processed unlawfully.
 - (5) The personal data relating to you must be erased for compliance with a legal obligation arising from European Union law or the law of the Member State which applies to the controller.
 - (6) The personal data relating to you has been collected in relation to the offer of information society services referred to in Article 8(1) GDPR.
- b) Information to third parties

Where the controller has made the personal data relating to you public and is required to erase them in accordance with Article 17(1) GDPR, they shall take appropriate measures, including those of a technical nature, taking into account the technology available and the implementation costs, to inform those responsible for processing the personal data that you, as a data subject, have requested that all the links to such personal data or copies or replications of such personal data be erased.

c) Exceptions

The right to erasure does not apply insofar as processing is necessary

- (1) to exercise the right to freedom of expression and information;
- (2) to fulfil a legal obligation required under European Union law or the law of the Member State which applies to the controller, or to carry out a task in the public interest or in the exercise of official authority vested in the controller;
- (3) for reasons of public interest in relation to public health in accordance with Article 9(2)(h) and Article 9(3)(i) GDPR;
- (4) for archiving purposes, scientific or historical research purposes or for statistical purposes of public interest in accordance with Article 89(1) GDPR, insofar as the right referred to in section a) is likely to render impossible or seriously affect the realisation of the objectives of such processing, or
- (5) to assert, exercise or defend legal claims.

5. Right to notification

Where you have exercised your right to rectification, erasure or restriction of processing in respect of the controller, they are obliged to notify all recipients to whom your personal data has been disclosed of the correction or erasure of the data or the restriction of processing, unless this proves to be impossible or entails a disproportionate effort.

You have the right to be informed about these recipients by the controller.

6. Right to data portability

You have the right to receive the personal data relating to you which you have provided to a controller, in a structured, commonly used and machine-readable format. In addition, you have the right to transmit that data to another controller without hindrance from the controller to which the personal data has been provided, where

- (1) the processing is based on consent in accordance with Article 6(1)(a) GDPR or Article 9(2)(a) GDPR, or on a contract in accordance with Article 6(1)(b) GDPR and
- (2) the processing is carried out by automated means.

In exercising this right, you have the right to have the personal data transmitted directly from one controller to another, where technically feasible. The freedoms and rights of other persons must not be affected by this.

The right to data portability does not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

7. Right to object

You have the right to object, at any time, to the processing of personal data relating to you which is based on Article 6(1)(e) or (f) GDPR, on grounds relating to your particular situation. This includes profiling based on those provisions.

The controller shall no longer process the personal data relating to you unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the assertion, exercise or defence of legal claims.

Where personal data relating to you is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data relating to you for such marketing purposes, which includes profiling insofar as it is related to this direct marketing.

Where you object to processing for direct marketing purposes, the personal data relating to you shall no longer be processed for such purposes.

In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, you may exercise your right to object by automated means using technical specifications.

8. Right to revoke consent to data protection

You have the right to revoke your consent to data protection at any time. Revoking your consent will not affect the legality of the processing carried out prior to consent being revoked.

9. Automated decision making and profiling

You have the right not to be subjected to a decision based solely on automated processing, including profiling, that has a legal effect or affects you in a similar manner. This does not apply if the decision

- (1) is required for the conclusion or fulfilment of a contract between you and the controller,
- (2) is permissible on the basis of the European Union or Member State legislation which applies to the controller, and that legislation contains appropriate measures to safeguard your rights and freedoms and your legitimate interests or
- (3) takes place with your express consent.

However, these decisions must not be based on special categories of personal data under Article 9(1) GDPR, unless Article 9(2)(a) or (g) GDPR applies and appropriate measures have been taken to protect your rights and freedoms as well as your legitimate interests.

With regard to the instances referred to in (1) and (3), the controller shall take appropriate measures to uphold your rights and freedoms and your legitimate interests, including at least the right to obtain the intervention of a person on the part of the controller, to present your position and to contest the decision.

10. Right to lodge a complaint with a supervisory authority

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of their habitual residence, place of work or the place of the alleged infringement if you consider that the processing of personal data relating to you infringes this Regulation.

The supervisory authority with which the complaint has been lodged shall inform the complainant of the progress and the outcome of the complaint including the possibility of a judicial remedy in accordance with Article 78 GDPR.