

# Data privacy statement

As part of our duty to provide information (Article 13 ff. GDPR), we inform you as a user which data is processed when you visit our website and on which legal basis this occurs. Furthermore, you will receive information on how we protect your data from a technical and organisational point of view and which rights you have vis-à-vis us and the relevant supervisory authority.

## 1. Information on the data controller

Corporate association of the Simba Dickie Group,  
consisting in detail of the companies listed in the Annex.

## 2. Data protection supervisors of the Simba Dickie Group

Volkhard Wacker (Group)  
Petra Müller (Burghaslach)  
Norbert Pillmann (Sonneberg)

Contact our data protection supervisors by email at:

[datenschutz@simba-dickie.com](mailto:datenschutz@simba-dickie.com)

## 3. Processing of your personal data

Informational use of our website

When you visit our website, so-called log files are processed, as a result of which they are automatically recorded by our system.

The following log files are processed automatically:

- IP address of the requesting computer
- Type of Internet browser used
- Operating system and its version
- Operating system user interface
- Accessed pages
- Time and date of visit
- Time zone difference to Greenwich Mean Time (GMT)
- Access status/http status code
- Amount of data transferred
- Referrer

Your data will not be stored together with other personal data.

The aforesaid data must be processed in order to provide our website.

The legal basis for processing the data for anonymisation purposes is point (f) of Article 6 (1) GDPR.

#### **4. Contact form**

You can use our contact form to contact us electronically, for example to provide us with feedback or to ask us questions. When using this option, you provide us with the following data:

- Email address (to contact you)
- First and last name (to prevent misuse)
- Message and subject
- Phone number (voluntary)

In addition to the data that you provide us with voluntarily, we also save the time and date of transmission of your data to us as well as your IP address. The processing of this data corresponds to our legitimate interest (Article 6 (1) GDPR) of guaranteeing the security of our systems and preventing misuse. This data, which we additionally collect when you contact us, is deleted as soon as it is no longer needed, at the latest when the reason for contacting us has been fully clarified.

By sending the contact form, you agree to us processing personal data concerning you. The data will be stored until it is no longer required to establish contact with you and the reason for contacting us has been fully clarified.

If you conclude a contract with us through the website, your data will be stored for as long as it is necessary for the execution of the contract. In addition, we only store your data to meet contractual or legal obligations (e.g. tax obligations) (Article 6 (1) GDPR).

#### **5. Contact by email**

You can obviously also contact us by email. Personal data concerning you transmitted in the email shall be saved by us. There will be no transfer of your personal data to third parties. The data will only be used to process your contact and shall be deleted as soon as the purpose for communication has been fulfilled.

If you wish to conclude a contract (e.g. an order) with us by email, the additional legal basis for processing your personal data is Article 6 (1) GDPR. This data will be stored for as long as it is necessary for the execution of the contract. In addition, we only store your data to meet contractual or legal obligations (e.g. tax obligations).

You may revoke your consent to the processing of your personal data at any time by sending a respective email to "datenschutz@simba-dickie.com". In this case, all personal data of the conversation will be deleted and continuation of the conversation is then no longer possible.

#### **6. Newsletter**

Our website offers you the chance to register for one of our newsletters free of charge. To do so, we require your email address and your declaration of consent. By sending the newsletter registration, you agree to us processing personal data concerning you.

Further information, e.g. your name, is voluntary and enables us to contact you personally.

The requested newsletter will not be sent to you until you confirm your registration via the link provided in an email sent to you for this purpose. This ensures that only you can subscribe to the newsletter yourself.

Within the scope of your newsletter registration, we additionally save the time and date of the transmission of your data and your IP address. The processing of this data corresponds to our legitimate interest (Article 6 (1) GDPR) of guaranteeing the security of our systems and preventing misuse.

Your data will not be transferred to third parties and will only be processed in connection with the sending of newsletters.

Your data and your email address will only be stored for the period of your active newsletter subscription if you have given us your consent to do so. The data that we additionally collect automatically during your registration (IP address, time and date) will be deleted at the latest when you cancel your newsletter subscription.

### **Opt-out option / Cancelling the newsletter**

You can unsubscribe from or cancel our newsletter at any time. The respective link can be found in every newsletter. By doing so, you revoke your consent or object to further use of your data for the purpose of sending the newsletter.

## **7. Cookies**

Please note the following information: You can ensure that no cookies are stored on your computer at all or that storage is only permitted for certain cookies. This can be achieved by adjusting your Internet browser settings accordingly. You can also view and delete stored cookies there.

However, disabling cookies completely may mean that you cannot use all the features of our website.

We use cookies on our website. Cookies are small text files that are transferred from our website to your browser and kept by it on your computer for subsequent retrieval. A cookie can therefore identify your Internet browser when you visit the website again.

Please note the option to configure cookies on our website.

### **a. Own cookies**

We utilise our own cookies to ensure **full functionality of our website**. Some elements of our website require that your Internet browser is recognised after changing pages.

The **legal basis** for processing personal data in the cookies that we place on our website to ensure **full functionality** of our website and our online offerings is Article 6 (1) GDPR.

### **Possibility of objection and elimination**

As explained at the beginning of this section, you can enable or restrict the transfer of cookies by adjusting the settings in your Internet browser accordingly. You can delete cookies that have already been saved by your Internet browser at any time. However, limiting or disabling cookies completely may mean that you cannot use all the features of our website.

### **b. Third-party cookies:**

We use cookies on our website from so-called “third parties”. This means that when you visit our website, data is transferred from your web browser to the web server of the third party and stored there.

#### **aa. Google Analytics**

Our website uses Google Analytics, a web analytics service provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (hereinafter referred to as: “**Google Analytics**”).

We use the function of Google Analytics to anonymise your IP address prior to storing or processing it. Your IP address is usually shortened within the European Union or in other member states of the European Economic Area before being transferred to Google servers in the USA. Your information is pseudonymised before being processed and will not be associated with any other personal data concerning you.

We use the data collected in this manner for statistical purposes only in order to optimise our website and online offerings.

You can also prevent the gathering of data (including your IP address) generated by the cookie and related use of this website being sent to and processed by Google by downloading and installing the browser plugin available via the following link (<http://tools.google.com/dlpage/gaoptout?hl=de>).

You can either prevent Google cookies from being stored by adjusting your browser settings accordingly, or you can prevent the processing of your data by clicking on the following link and choosing to “opt-out”: [Please click this link](#). An “*opt-out cookie*” is set and prevents the collection of your user data on this website.

The Google privacy policy can be found under the following link: <https://policies.google.com/privacy?hl=de>.

## **bb. Matomo (formerly Piwik)**

On our website, we use the open source analytics service Matomo (matomo.org). The analysis allows us to determine how many visitors have accessed our website.

The Matomo software anonymises IP addresses before storing them. Your information (for anonymisation purposes) is pseudonymised before being processed and will not be associated with any other personal data concerning you.

We use the data collected in this manner for statistical purposes only in order to optimise our website and online offerings.

You can either prevent Matomo cookies from being stored by adjusting your browser settings accordingly.

## **Salesforce**

Nexum processes data for our newsletter with software from Salesforce through the use of cookies. The corresponding data protection information can be accessed via the following link:

<https://www.salesforce.com/form/other/privacy-request/>

## **8. Other third party content included on our website**

### **YouTube**

To enhance the appealing design of our website, we include YouTube videos operated by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (hereinafter referred to as: “**YouTube**”). We use the advanced privacy mode<sup>[AH6]</sup> so that information about you is only shared with YouTube when you activate the video by clicking the video’s play button.

When you activate the video, YouTube uses cookies to collect information for analytical purposes and to improve user friendliness. According to YouTube, the data is pseudonymised before being processed. However, if you are signed in to your Google or YouTube account, the data may be linked directly to your YouTube account.

More information on data protection, including how long your data is stored by YouTube, can be found in the Google privacy policy under: <https://policies.google.com/privacy?hl=de&gl=de>.

The legal basis for the integration of the YouTube service on our website and the associated processing of your data is Article 6 (1) GDPR.

### **Social networks - Facebook**

Our website provides so-called “social plugins” of the social network of Facebook (Facebook Inc, 1601 Willow Road, Menlo Park, CA 94025, USA. Company phone, 650-618-7714).

You can recognise these plugins due to the Facebook logo or the Facebook “I like” button (thumb up symbol).

An overview of Facebook plugins can be found under: <https://developers.facebook.com/docs/plugins/>.

If you call such a plugin while visiting our website, a direct connection is established to the Facebook servers and data is transmitted to Facebook and stored there. This applies regardless of whether you are a Facebook member or not.

Please note that we have no influence on the type, scope or use of the data transmitted to Facebook. We also have no information concerning the deletion of the data collected.

If you are logged in to Facebook as a Facebook user while visiting our website, your data will be added to your Facebook profile. If you want to avoid this type of data transfer,

always log out of Facebook before visiting our website.

More information on how Facebook collects, uses and stores personal data concerning you can be found under:

<http://www.facebook.com/about/privacy/>.

The legal basis for the use of plugins is point (f) of Article 6 (1) GDPR.

### **9. Applicant data**

On our website, we inform you about vacancies in our team and you can send us your application by email. We utilise your data in order to process your application, i.e. your application is viewed by the employees

responsible for candidate pre-selection. Your data will not be transferred to third parties and will only be processed in connection with your application.

In case your application is unsuccessful, your data will be deleted immediately. In the event of justified interest in your application, we will store your data for a maximum period of six months, unless you consent to your data being stored for a longer period in order to contact you, if necessary, after the six-month storage period has expired.

The legal basis for processing your data is Section 26 of the German Federal Data Protection Act (BDSG) and Article 88 GDPR.

## **10. Your rights**

When we process your data, you are a “data subject” within the meaning of the General Data Protection Regulation (GDPR). You have the following rights:

### **a. Right of access by the data subject**

You have the right to ask us to confirm whether we are processing your personal data.

If we process your personal data, you have the right to obtain the following information:

- the purposes of processing;
- the categories of personal data concerned;
- the recipients or categories of recipient to whom the personal data has been or will be disclosed, in particular recipients in third countries or international organisations;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of the right to request from us rectification or erasure of personal data or restriction of processing of personal data concerning you or to object to such processing;
- the right to lodge a complaint with a supervisory authority;
- where the personal data is not collected from you, any available information as to its source;
- the existence of automated decision-making, including profiling, referred to in Article 22 (1) and (4) and, at least in those cases, meaningful information on the logic involved, as well as the significance and the envisaged consequences of such processing for you.

If we transfer your data to an international organisation or to a third country, you also have the right to request information on whether suitable guarantees pursuant to Article 46 GDPR exist in connection with the transfer.

### **b. Right to rectification**

You have the right to rectification and/or completion of the data that we have stored about you if this data is inaccurate or incomplete. We will then rectify and/or complete the inaccurate or incomplete data without undue delay.

### **c. Right to restriction of processing**

Under certain conditions, you have the right to request us to restrict the processing of your personal data. In this case, one of the following conditions must apply:

- you contest the accuracy of the personal data for a period enabling us to verify the accuracy of the personal data;

- the processing is unlawful and you oppose the erasure of the personal data and request the restriction of its use instead;
- we no longer need the personal data for the purposes of the processing, but it is required by you for the establishment, exercise or defence of legal claims, or
- you have objected to processing pursuant to Article 21 (1) GDPR pending the verification whether our legitimate grounds override yours.

#### **d. Right to erasure**

You shall have the right to obtain from us the erasure of personal data concerning you without undue delay if we are obliged to do so. This is the case when one of the following conditions applies:

- your personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed.
- you withdraw consent on which the processing is based according to point (a) of Article 6 (1) or point (a) of Article 9 (2) GDPR, and where there is no other legal ground for the processing.
- you object to the processing pursuant to Article 21 (1) GDPR and there are no overriding legitimate grounds for the processing, or you object to the processing pursuant to Article 21 (2) GDPR.
- your personal data has been unlawfully processed.
- your personal data has to be erased for compliance with a legal obligation in Union or Member State law to which we are subject.
- your personal data has been collected in relation to the offer of information society services referred to in Article 8 (1) GDPR.

Where we have made the personal data public and are obliged pursuant to the aforesaid conditions to erase your personal data, we, taking into account the available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform the data controllers who are processing your personal data that you have requested the erasure by us of any links to, or copy or replication of, this personal data.

However, your right to erasure shall not apply to the extent that processing is necessary according to the following reasons (exceptions):

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires processing by Union or Member State law to which we are subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in us;
- for reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9 (2) as well as Article 9 (3) GDPR;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89 (1) GDPR in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing, or
- for the establishment, exercise or defence of legal claims.

#### **e. Notification obligation**

If you have asserted your right to rectification, erasure or restriction against us, we are obliged to communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data has been disclosed, unless this proves impossible or involves disproportionate effort.

**f. Right to data portability**

You have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit this data to another controller:

(1) the processing is based on consent pursuant to point (a) of Article 6 (1) or point (a) of Article 9 (2) GDPR or on a contract pursuant to point (b) of Article 6 (1) and

(2) the processing is carried out by automated means.

In exercising your right to data portability, you have the right to have the personal data transmitted directly

from one controller to another, where technically feasible and it does not adversely affect the rights and freedoms of others.

This right to data portability shall 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 us.

**g. Right to object**

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

We shall no longer process your personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

When we process your personal data for direct marketing purposes, you have the right to object at any time to processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing.

If you object to processing for direct marketing purposes, your personal data shall no longer be processed for such purposes.

**h. Right to withdraw consent**

You have the right pursuant to Article 7 (3) GDPR to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

**i. 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 your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the GDPR.

An overview of the respective German data protection officers and their contact details can be found under the following link:



[https://www.bfdi.bund.de/DE/Infothek/Anschriften\\_Links/anschriften\\_links-node.html](https://www.bfdi.bund.de/DE/Infothek/Anschriften_Links/anschriften_links-node.html).

#### **11. Up-to-dateness of these data privacy regulations**

We reserve the right to change this data privacy statement at any time with effect for the future.

**Updated: 1 April 2022.**

#### **Appendix**

The list of companies belonging to the Simba Dickie Group can be accessed via the following link:

<https://www.simba-dickie-group.com/en/the-group/locations/>