

Privacy Policy for Business partners

per Article 13 DSGVO

We attach great importance to the protection of your data and the protection of your privacy. Below we inform our business partners in accordance with the provisions of the European General Data Protection Regulation (DSGVO) and the Federal Data Protection Act (BDSG-neu) on how we collect, store and process your personal data at AP&S International GmbH and which rights you are entitled to. By business partners, we mean our contact person for prospective customers, customers, distribution partners, suppliers and general partners; hereafter referred to collectively as "business partner".

These data protection notices for all products and services offered apply to all companies affiliated with AP&S International GmbH (see point 6). Excluded are services and offers that identify their own privacy notices.

This Privacy Policy is in addition to our existing General Privacy Policy, which provides you with specific information about how we process your personal information as part of our website visit or other specific topics.

1. Who is responsible for the processing of your personal data?

Responsible the processing of your personal data is:

AP&S International GmbH
Obere Wiesen 9
78166 Donaueschingen
Telefon: 0771 8983 0
E-Mail: datenschutz@ap-s.de

Hereinafter referred to as AP&S or company or we.

You can contact our data protection officer (EU) as follows:

Wolfgang Homann
c/o bbcom secure Deutschland gmbh
Reichenaustraße 11
78467 Konstanz
E-Mail: datenschutz@ap-s.de

Our data protection officer in Singapore can be contacted via mail or email as follows:

Sebastian Blasius
Luther LLP
4 Battery Road
Bank of China Building, #25-01
Singapur 049908
Email: sebastian.blasius@luther-lawfirm.com
Tel.: +65 6408 8000

2. For what purpose do we process your data?

As part of the cooperation with business partners, AP&S International GmbH processes personal data for the following purposes:

- Initiation or execution of a contractual relationship or the implementation of pre-contractual measures;
- Communicating with business partners about products, services and projects, e.g. to process inquiries and orders of the business partner;

- Planning, implementation and management of the (contractual) business relationship between AP&S International GmbH and the business partner, e.g. to handle the ordering of products and services, to collect payments, for bookkeeping, billing and collection and to perform deliveries, maintenance or repairs;
- Conduct customer surveys, marketing campaigns, market analysis, sweepstakes, competitions or similar promotions and events;
- Maintain and protect the safety of our products and services as well as our websites,
- Comply with legal requirements (such as tax and commercial repositories), existing obligations to conduct compliance screening (to prevent white-collar crime or money laundering), and to adhere to AP&S International GmbH guidelines and industry standards;
- Prevent and detect security risks, fraud or other criminal or intentional acts;
- Settling litigation, enforcing existing contracts and asserting, exercising and defending legal claims.

3. On which legal basis do we process your data?

We process your personal data in accordance with the provisions of the European General Data Protection Regulation (DSGVO) and the Federal Data Protection Act (BDSG-neu). If these are required for establishing a contract, performing the contract, performing the contract and for carrying out pre-contractual measures, processing pursuant to Article 6 paragraph 1 letter b DSGVO lawful.

If you give us express consent to the processing of personal data for specific purposes (e.g. disclosure to third parties, evaluation for marketing purposes or advertising), the legality of such processing based on your consent under Article 6 paragraph 1 letter a DSGVO given. A given consent can be withdrawn at any time, with effect for the future.

If required and permitted by law, we process your data beyond the actual purpose of the contract in order to fulfill legal obligations pursuant to Article 6 paragraph 1 letter c DSGVO. In addition, processing may be carried out to protect legitimate interests of us or third parties in accordance with Article 6 paragraph 1 letter f DSGVO. If necessary, we will inform you separately, indicating the legitimate interest, insofar as this is prescribed by law.

4. What information and personal data do we process from you:

For the aforementioned purposes, AP&S International GmbH may process the following categories of personal data:

- Contact information such as first and last name, business address, business phone number, business mobile number, business fax number, and business email address;
- Payment information, such as that required to process payment or fraud prevention, for credit card payments, including credit card information and card verification numbers;
- Information whose processing is required within the scope of a project or the contract, contract execution and fulfillment of the contract with AP&S International GmbH;
- Further information voluntarily provided by our contacts to us, such as other project participants, internal and external contact persons or special execution requests;
- Previously purchased products or services and their history;
- Information collected from publicly available sources, information databases or credit bureaus;
- As far as required in the context of compliance screening: information on relevant legal proceedings and other litigation in the business partners are involved.

5. Who receives your data?

We disclose your personal data within our company exclusively to the areas and persons who need this data for the fulfillment of the contractual and legal obligations or to areas and persons for processing in the context of our legitimate interest in accordance with Article 6 paragraph 1 letter f DSGVO.

When processing your personal data, we also use service providers; For example, in the maintenance and care of our software programs and the IT infrastructure or in the fight against cybercrime. Your personal data will be passed on to third parties in our order and processed by them. This is done on the basis of instruction processing contracts according to Article 28 DSGVO. In doing so, we ensure that the processing of personal data takes place in accordance with the provisions of the DSGVO and that your data is protected and processed in accordance with the applicable data protection regulations. Categories of recipients include companies that support us in the following areas: IT services, cybercrime prevention, data storage and linking, marketing, market research, payment processing, provision of products and services, online marketing, trade fairs and events, shipping logistics, compliance with compliance requirements and regulatory requirements (e.g. Comparison with anti-terrorist lists for exports). We only share the minimum amount of personal information that our service providers need to provide their services.

In certain cases, we also pass on your personal data to business partners who represent our products as dealers or distributors nationally and internationally. If we receive a request and if, for example, we register a visit at fairs with a request for further information, which is to be assigned to a specific trading partner by us, we will forward the personal data to this business partner for processing. Our business partner will then contact you instead of us. When we share personal information with other business partners, we require them to protect and process your information in accordance with applicable privacy laws. The processing and distribution are based on Article 6 paragraph 1 letter f DSGVO. The legitimate interest lies in an efficient and customer-oriented sales structure and optimal customer service for our products and services. If you do not wish this distribution, you can notify us at any time and revoke a disclosure. However, it may be that we cannot execute your request or order in this case.

Data transfer to recipients outside the company or affiliated companies is otherwise only to the extent that this is permitted or required by law or if disclosure is required for the settlement and thus for the performance of the contract. This also includes pre-contractual measures that are carried out at your request and in which a transfer to third parties for implementation is required.

Disclosure may also be based on your explicit consent or if we are authorized to provide information. Recipients of personal data can also be public bodies and institutions in the event of a legal or regulatory obligation (e.g. public prosecutor, police, supervisory authorities, tax office).

A transfer of your data to other third parties without explicit consent, such as for advertising purposes, does not occur.

6. Transfer of personal data to affiliated companies

AP&S International GmbH may transfer personal data to other Global Plus GmbH Group companies or companies affiliated with Global Plus GmbH (hereinafter referred to as Global Plus GmbH) for the purposes mentioned above, but only if this is necessary to fulfill the above-mentioned purposes (see also Points 2, 3 and 5).

We only share the necessary minimum of personal information with other Global Plus GmbH companies, for example, to provide the products and services you request, manage and improve our products, services and day-to-day operations. Companies of the Global Plus GmbH can also be outside the EU and the EEA economic area (third countries) and legally have lower data protection requirements than those of the EU. Personal data will only be transmitted to Global Plus GmbH recipients in third countries if they have either concluded with us EU standard contractual clauses or have introduced binding corporate rules at EU data protection level. Further information can be obtained from the contact specified under point 1.

The basis for data processing is Article 6 paragraph 1 letter b DSGVO, which justifies the processing of data for the performance of a contract or precontractual measures and Article 6 paragraph 1 letter f DSGVO in accordance with the legitimate interests set out above (see also Items 2, 3 and 5).

7. Data transmission to a third country

The transfer of personal data to a country or an international organization outside the European Union (EU) or the European Economic Area (EEA) is subject to statutory or contractual permissions only under the conditions set out in Article 44 et seq. DSGVO. This means that there is an adequacy decision by the EU Commission under Article 45 DSGVO for the country in question, suitable safeguards for data protection under Article 46 DSGVO or binding internal data protection provisions pursuant to Article 47 DSGVO exist.

A transfer of data to offices in countries outside the European Economic Area EU / EEA (so-called third countries) shall take place if it is necessary for the performance of a contractual obligation towards you, or if it is within the legitimate interest of us or a third party or you have given us consent. The processing of your data in a third country may also occur in connection with the involvement of service providers in the context of order processing. For information on the appropriate or reasonable warranties and how and where to obtain a copy of them, please contact us via the contact indicated in point 1.

8. How long will the data be stored?

If necessary, we process and store your personal data for the duration of our business relationship or for the fulfillment of contractual purposes. This also includes the initiation and execution of a contract. In addition, we are subject to various storage and documentation obligations, which result, inter alia, from the German Commercial Code (HGB) and the Tax Code (AO). The prescribed periods for storage or documentation are two to ten years, in some cases up to thirty years.

We also save and use your information for a reasonable amount of time after the order has been placed in order to keep you informed about our services and offers and to provide you with information about this. This is done on the basis of Article 6 paragraph 1 letter f DSGVO. Mandatory statutory provisions – especially retention periods – remain unaffected. After this period, we will delete personal information in a secure manner. If data is needed after this period for analytical, historical or other legitimate business purposes, we will take appropriate measures to anonymize that data.

9. Children

Our offer is basically directed to adults. Persons under the age of 18 should not submit any personal data to us without the consent of their parents or guardians.

10. Necessity of providing personal data

The provision of personal data for the purpose of establishing a contract, performing the contract and fulfilling the contract or for carrying out pre-contractual measures is generally not required by law or by contract. You are therefore not obliged to provide personal data. Please note, however, that these are usually required to decide on a contract, fulfillment of the contract or for pre-contractual action. If you do not provide us with any personal information, we may not be able to make a decision under contract. We recommend that you always enter only personal data that is required for the conclusion of the contract, the fulfillment of the contract or precontractual measures.

11. Automatic decision-making

In principle, we do not use fully automated decision-making pursuant to Article 22 DSGVO to justify, fulfill or carry out the business relationship and for pre-contractual measures. If we use these procedures in individual cases, we will inform you about this separately or obtain your consent.

12. What rights do I have in compliance to my personal information?

You can request information about the personal data stored under the addresses listed under point 1. In addition, you may request the correction and, under certain conditions, the deletion of your data. You also have the

right to restrict the processing of your data and the right to disclose the information you provide in a structured, common and machine-readable format.

Right of objection

If we process your data in order to safeguard legitimate interests, you can object to this processing for reasons that arise from your particular situation. We will then no longer process your personal information unless we can demonstrate compelling legitimate grounds for processing that outweigh your interests, rights and freedoms, or the processing is intended to assert, exercise or defend legal claims.

If the processing of data is based on your consent, you are entitled according to Article 7 DSGVO to revoke your consent to the use of your personal data at any time. Please note that the revocation only works for the future. Processing that occurred before the revocation is not affected. Please also note that we may need to retain certain data for regulatory compliance for a certain period of time.

In individual cases, we process your personal data in order to operate direct mail. You have the right to object to the processing for the purpose of such advertising at any time. This also applies to profiling insofar as it is connected with this direct mail. If you object to the processing for the purpose of direct mail, we will not process your personal data further for these purposes.

You have the option to contact our data protection officer or a data protection supervisory authority with a complaint.