

1. Object of this Privacy Notice

Protecting your personal data is an absolute priority for us. In the following Privacy Notice, we inform business partners of STRATEC SE, and in particular its customers, service providers, suppliers, advisors, and other contractual partners, as well as its employees, about the ways in which their personal data are processed and their rights in this respect.

This Privacy Notice is regularly reviewed to ensure that it is up to date and accurate. Accordingly, this Privacy Notice may be amended at any time. The date of the most recent update can be found in the footer of the Privacy Notice.

2. Responsible body and data protection organization

The responsible body within the meaning of the General Data Protection Regulation (GDPR) is STRATEC SE. Any questions or comments regarding this Privacy Notice, or concerning data protection in general, should be addressed to the data protection organization at STRATEC SE. This can be reached via the following e-mail address: datenschutz@strattec.com.

3. Type of data processed and purpose of processing

As a matter of principle, we only process those personal data of our business partners and their employees that are necessary for the initiation, execution, or fulfillment of the respective business relationship or that serve to maintain and expand the business relationship. These primarily involve the following personal data:

- Contact information, such as first name, surname, business address, business telephone number, business cellphone number, and business e-mail address;
- Organization information, including the respective position within the organization and the company name;
- Payment data, such as disclosures required to handle payment transactions or prevent fraud, including credit card information with verification numbers;
- Further information required in connection with the business relationship or the execution of a contractual relationship with us or which is voluntarily provided by business partners, e.g. in connection with orders placed, inquiries, or project details;
- Data collected from publicly accessible sources (including company and work-related social networks and websites), information databases, and credit agencies, and
- Data that are required by law for compliance and export control screenings, such as date of birth, nationality, place of residence, passport/ID numbers, information on relevant court proceedings and other legal disputes in which the business partners are involved.

We process the personal data of our business partners and their employees for the following purposes:

- To communicate with business partners with regard to products, services, and projects, e.g. to process inquiries made by the business partner or to provide technical information on products;
- To plan, execute, and administer the (contractual) business relationship between the business partner and STRATEC SE, e.g. to handle orders of products and services, collect payments, for accounting and invoicing purposes, and to provide deliveries;
- To perform market analyses and organize events;
- To initiate contact with information and offers concerning our products and services and to execute further marketing activities;
- To comply with statutory requirements (e.g. retention obligations under tax and commercial law), existing obligations to perform compliance-related screenings (in order to avert economic crime or money laundering), and our policies and standards;
- To settle legal disputes, enforce existing contracts, and assert, exercise, and defend legal claims.

4. Legal basis for processing

The processing of personal data is performed on the legal basis provided by the General Data Protection Regulation (GDPR). Pursuant to Art. 6 (1) lit. b) GDPR, the processing of personal data is lawful if it is necessary for the performance, fulfillment, or termination of the business relationship if the data subject is also directly a party to the contract.

Furthermore, we may be legally obliged to process the personal data. In this case, the legal basis for processing is provided by Art. 6 (1) lit. c) GDPR.

A further legal basis for processing personal data may be the informed consent provided by the data subject to such processing pursuant to Art. 6 (1) lit. a) GDPR.

Finally, data processing may also be performed on the basis of interests weighed up pursuant to Art. 6 (1) lit. f) GDPR. In this case, our legitimate interest involves processing your personal data for the purpose of initiating, executing, and fulfilling our business relationship. If our legitimate interest in processing constitutes the legal basis for processing personal data, your interests and rights are suitably and adequately accounted for, as we regularly review the processing activities and associated processes presented in this Privacy Notice. Moreover, we factor the protection of your personal data into our processes and safeguard the transparency of our processing activities. If you wish to receive further information about the aforementioned weighing up of interests, please contact our data protection organization at datenschutz@strattec.com. You will then be notified separately of the interests weighed up in connection with the respective processing.

5. Data storage period

As a general rule, personal data are stored for the duration of the business relationship.

We comply with any statutory retention periods that may apply, e.g. for data relevant to commercial or tax law.

Where no statutory retention obligations apply, personal data may be deleted when the further processing of such is no longer necessary for the respective processing purpose.

Following the termination of a business relationship, the data are stored until the limitation period expires for any possible damages claims by either party. Storage for longer periods may be considered if this is also in your interest or if you have consented to such.

We will regularly review whether and, if so, to what extent data of business partners may be deleted due to storage no longer being required.

6. Data recipients

Your data will only be forwarded within the company and the Group if and to the extent required for the purpose of executing the business relationship.

We commission service providers to perform tasks, e.g. IT services or payment handling, on our behalf. These companies process personal data solely for the purpose of the services thereby commissioned.

Furthermore, data are also forwarded to bodies such as the financial authorities, tax advisors, and auditors to the extent that we are legally obliged to do so.

7. Where are the data processed?

As a general rule, data are processed at our premises and/or on dedicated IT systems. Apart from administrators, only such persons who require the data for the processing purpose have access to such.

If and to the extent that personal data are processed at service providers, particularly outside the European Economic Area, we ensure that such processing is performed in accordance with the requirements of data protection law, e.g. by concluding EU standard contractual clauses.

8. Your rights as the “data subject”

If data are collected on the basis of Art. 6 (1) lit. f) GDPR (data processing to protect legitimate interests), you have the right, on grounds relating to your particular situation, to object at any time to the processing of personal data concerning you. We will then no longer process the data unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights, and freedoms of the data subject or if processing is necessary for the establishment, exercise, or defense of legal claims.

If you have provided us with your consent for data protection purposes, you may at any time withdraw this consent with future effect.

In addition, pursuant to the legal requirements set out in Art. 15 to 20 GDPR you at all times have the right of access, rectification, restriction, and erasure concerning the processing of your personal data, as well as a right to data portability. You may assert these rights towards STRATEC SE free of charge via the following contact data:

STRATEC SE
- Data Protection Organization -
Gewerbestr. 37
75217 Birkenfeld
Germany
E-mail: datenschutz@stratec.com
Tel: +49 7082 7916-0

Furthermore, pursuant to Art. 77 GDPR you also have the right to lodge a complaint with the relevant supervisory authority if you consider that the processing of your personal data by STRATEC SE is unlawful.