#### **Privacy statement**

With the following information we will give you an overview of the processing of your personal data by us and your rights from data protection law.

### 1. Who is responsible for the data processing and who can I contact?

The responsible party is:

Deutscher Verband des Grosshandels mit Ölen, Fetten und Ölrohstoffen e. V. [German Association of the Wholesale Trade with Oils, Fats and Raw Oil Materials]

Adolphsplatz 1, 20457 Hamburg Phone: +49 40 369879 -0 Fax: +49 40 369879 -20 Internet: <u>www.grofor.de</u> E-mail: <u>info@grofor.de</u>

# 2. For whom does this privacy statement apply?

In this privacy statement it concerns the visitors to our website, in particular our members, interested parties as well as persons, who use and would like to use our range of offers, or would like to inform themselves about the German Association of the Wholesale Trade with Oils, Fats and Raw Oil Materials as well as initial information for all persons, whose data we have researched from publicly accessible sources or have received by business cards, and that we use for the purposes of the work of the association.

### 3. Which data do we use?

You can principally visit our website without informing us of your identity, unless you send us an e-mail or a message via a contact form, register for our events or would like to apply for a job in our association. We only process the data, which are necessary in order to answer your enquiry or for the provision of our services. Which data are collected can be seen from the respective input forms. The necessary data will be marked as mandatory fields. Insofar as we request you to provide further information this concerns voluntary information. We use these details in order to design our offers more individually or to be able to orientate these more suitable for your needs. In all other cases we will only use the data, which are necessary in order to contact you.

### 4. Purpose and legal basis of the data use

We process your personal data in line with the provisions of the General Data Protection Regulation (EU GDPR) and the Federal Data Protection Act (BDSG). Please also pay attention in this respect to <u>our information about your right of objection according to Article 21 EU GDPR</u>.

# a) With regard to the fulfilment of contractual obligations (Art. 6 Para. 1b EU GDPR)

The processing of personal data is carried out in order to provide our offer as well as to take pre-contractual measures, which are carried out following your request.

- Registration as a member
- Participation in our events
- Arbitration proceedings and communication

# b) Owing to your consent (Art. 6 Para. 1a EU GDPR)

Insofar as you have granted us your consent to the processing of personal data for certain purposes (e.g. participation in one of our events or order of a circular), the lawfulness of this processing exists based on your consent. A granted consent can be revoked at all times. Please pay attention that the revocation will only be effective for the future. Processing, which was carried out before the revocation, is not affected hereby.

• Sending of information material or a circular

# c) Within the scope of the weighing up of interests (Art. 6 Para. 1f EU GDPR)

Insofar as necessary we will process your data beyond the actual fulfilment of the contract in order to safeguard legitimate interests on our part or of third parties.

- Reply to your enquiry
- Assertion of legal claims and defence in case of legal disputes
- Guarantee of the IT security
- Processing of your application

### 4.1. Privacy policy for the receipt of the circulars / information letters

If you would like to receive our circulars and information letters, we will require an e-mail address from you as well as information, which permits us to check that you are the holder of the entered e-mail address and that you agree with the receipt of the circulars. Further data will not be collected or only on a voluntary basis. We use these data exclusively to send the requested information and will not forward these to third parties.

The processing of the data entered into the information distribution list registration form shall be exclusively carried out based on your consent (Art. 6 Para. 1 lit. a DSGVO). You can revoke the granted consent to the storage of the data, the e-mail address and their use for sending the circulars at all times by e-mail. The lawfulness of the already carried out data processing activities shall remain unaffected by the revocation.

The data deposited with us by you for the purpose of receiving information distribution will be stored by us until you are removed from the distribution list and will be deleted after the cancellation of the registration for the circulars. Data, which were stored by us for other purposes (e.g. e-mail addresses for the member zone) shall remain unaffected hereby.

### 4.2. Privacy policy for applications

The legal basis for the processing of your personal data in this application procedure is primarily Section 26 BDSG in the version that is valid from 25 May 2018. According to this regulation the processing of the data is permitted, which are necessary in connection with the decision about the establishment of an employment relationship. Should the data be required after the completion of the application procedure, if applicable for the assertion of legal rights, a data processing can be carried out based on the prerequisites of Art. 6 EU GDPR, in particular in order to safeguard legitimate interests according to Art. 6 Para. 1 lit. f) EU GDPR. Our interest will then exist in the assertion or defence of claims.

With the sending of your application you declare that you agree that we may store and process your data for the purposes of the application, filling of positions and hiring. You can revoke this consent at all times and withdraw your application.

The personal data of your application shall be exclusively processed by us for the purposes of the application processing and in the process for filling the position. The filling of the positions will be carried out in the field of the management. Your data will be deleted six months after the completion of the application process, unless you agree to a longer storage, if applicable, in order to take you into consideration with future job advertisements. In the event that you are hired your data will be taken over into our personnel data

#### 4.3. Registration on our website

If you register on our website in order to use personalised services personal data will be collected. These include the name, the address as well as the telephone number and the e-mail address as contact and communication data. The registration enables the access to services and contents, which are only available to registered users. If required, registered uses have the possibility to change or delete the data entered as part of the registration at all times. Upon request we will, of course, inform you which personal data were collected and stored. In addition, we will rectify or delete the data upon request presuming that a concern is not opposed by any statutory storage obligations. For queries as well as your request for correction or deletion of the data please use the contact data provided in this privacy statement.

#### 5. Integration of services and contents of third parties

Our range of offers among others comprises contents and services of other providers. These are, for example, maps, which are made available by Google-Maps, videos of YouTube as well as graphics and images of other websites. In order for it to be possible to call and present these data in the user's browser, it is absolutely essential to transmit the IP address. The providers (hereinafter referred to as "Third party providers") will thus perceive the IP address of the respective user. Even if we make an effort to exclusively use third party providers, which only require the IP address in order to be able to supply contents, we have no influence on whether the IP address may be stored. This process serves in that case among others for statistical purposes. If we have knowledge that the IP address is stored we will inform our users hereof.

### 5.1. Use of Google Analytics

This website uses Google Analytics, a web analysis service of Google Inc. ("Google"). Google Analytics uses so-called "cookies", Text files, which are stored on your computer and which enable an analysis of the use of the website by you. The information about your use of this website generated by the cookie is as a rule transmitted to a server of Google in the USA and stored there.

Owing to the activation of the IP anonymisation on these websites, your IP address will however be previously abbreviated by Google within member states of the European Union or in other contracting states of the Treaty on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a server of Google in the USA and abbreviated there. By order of the operator of this website Google will use this information in order to evaluate your use of the website in order to compile reports on the website activities and to provide further services associated with the website use and the internet use towards the website operator. The IP address transmitted by your browser within the scope of Google Analytics will not be aggregated with other data of Google. You can prevent the storage of the cookies by a corresponding setting of your browser software. However, we would like to point out to you that in this case you will, if applicable, not be able to use all functions of this website in full. You can additionally prevent the entry of the data generated by the cookie and which refer to your use of the website (incl. your IP address) to Google as well as the processing of these data by Google by downloading and installing the browser plugin available under the following link: Browser Add On for the deactivation of Google Analytics. Besides the option to install the Browser-Addon, there is a further alternative to prevent the entry of the data by Google Analytics. It is in particular of interest for users of mobile devices. For this purpose please click on this link. You will thus install a so-called Opt-Out-Cookie, which prevents the tracking of the data on this website. The function will continue to exist until the cookie is deleted. If the cookie was deleted it is sufficient to call the link once again.

### 5.2. Comment function

If comments or other contributions on our range of offers are written and published, we will store the IP address, the user name and the time of the creation. These data are collected for safety reasons as the provider may be held responsible for unlawful contents (forbidden propaganda, insults among others), even if they were created by a third party. In such a case the information serves to determine the identity of the author.

#### 6. Who receives my data?

In the German Association of the Wholesale Trade with Oils, Fats and Raw Oil Materials those bodies will receive access to your data, which require these in order to fulfil our contractual and statutory obligations or within the scope of the weighing up of interests. In order to reply to enquiries it may be necessary that these must be transmitted to third parties, such as for example umbrella

associations or to individual members of our association. Service providers and vicarious agents used by us may also receive data for these purposes if these safeguard the confidentiality and our instructions under data protection law. A forwarding to third parties shall be exclusively carried out within the scope of the regulations of the EU GDPR and the BDSG.

# 6.1. Forwarding for the order of publications / written correspondence of the court of arbitration

The personal data collected by us are forwarded to the delivery company commissioned with the delivery (e.g. DHL), insofar as this is necessary for the delivery of the goods.

# 7. Are data transmitted to a third country?

A data transmission to countries outside of the EU or of the EEA (so-called third countries) will not take place.

# 8. How long will my data be stored for?

We will process and store your personal data as long as it is necessary for the fulfilment of our contractual and statutory obligations. If the data are no longer required for the fulfilment of contractual or statutory obligations these will be deleted regularly, unless there – limited– further processing is necessary in order to fulfil storage deadlines under commercial and tax law, as for example the German Commercial Code and the German Fiscal Code. The deadlines stipulated therein for the storage or documentation are six or ten years.

# 9. Data protection rights

You have the right to information according to Article 15 EU GDPR, the right to rectification according to Article 16 EU GDPR, the right to deletion according to Article 17 EU GDPR, the right to limitation of the processing according to Article 18 EU GDPR, the right to objection from Article 21 EU GDPR as well as the right to data portability from Article 20 EU GDPR. In addition there is a right to lodge a complaint at a data protection supervisory authority (Article 77 EU GDPR in conjunction with. Section 19 BDSG).

A list of the supervisory authorities and their contact data can be seen from the following link:

https://www.bfdi.bund.de/DE/Infothek/Anschriften\_Links/anschriften\_links-node.html

You can revoke a granted consent to the processing of personal data at all times towards us. Please pay attention that the revocation will only be effective for the future. Processing, which was carried out before the revocation, is not affected hereby. Please also pay attention to <u>our information about your right to objection according to Article 21 EU GDPR</u>.

For the exercising of your rights please use the aforementioned contact.

# 10. Obligation to provide data

Within the scope of our business relationship or the order of services, you must provide those personal data, which are necessary for the execution of the business relationship or the provision of a service and the fulfilment of the thus associated contractual obligations or which we are obliged to collect by law. Without these data we must as a rule refuse to conclude the contract or the execution of the order or can no longer carry out an existing contract and therefore must end it if applicable.

# 11. Information about your right to objection according to Article 21 EU GDPR

### Individual case-related right to objection

You have the right, for reasons, which arise from your special situation to file an objection against the processing of your personal data. The prerequisite for this is that the data processing is carried out in the public interest or based on a weighing up of interests. In the event of an objection we will no longer process your personal data. Unless we can prove mandatory reasons that are worthy of protection for the processing of these data, which outweigh your interests, rights and freedom. Or your personal data serve the assertion, exercising or defence of legal claims.