

We would like to thank you for visiting our websites and for your interest in our products. We are aware of the necessity of comprehensive data protection in the Internet and set great store by the protection of your data and your privacy. By means of this statement, we would like to inform you about how the information you provide is used. We process personal data collected when you visit our websites in accordance with the statutory regulations, in particular the General Data Protection Regulation (GDPR), the Bundesdatenschutzgesetz (German Federal Data Protection Act) and the Telemediengesetz (German Telemedia Act).

1. Scope

This data privacy policy applies to Schleifring GmbH's Internet offering and the personal data collected via the websites www.schleifring.de and www.schleifringonline.com. For Internet offerings provided by other providers, especially those referred to by means of links, the data privacy policies of the respective providers apply.

2. Responsible party and data protection officer

The party responsible for the processing of personal data on these websites is:

Schleifring GmbH
Am Hardtanger 10
82256 Fürstenfeldbruck
Germany
E-mail: info@schleifring.de
Tel: +49-8141-403-0
Fax: +49-8141-403-45
(hereafter referred to as "Schleifring")

Schleifring's corporate data protection officer can be contacted at the above-mentioned address or at the e-mail address datenschutz@schleifring.de.

3. General information on data processing

3.1 Scope of the data processing

Schleifring collects and processes the users' personal data solely to the extent that these are required to deploy the website and the online shop.

3.2 Legal basis of the data processing

In accordance with the provisions of the GDPR, a legal basis is required for the processing of personal data. The legal basis depends in each case on the purpose of the data processing.

If the data subject has given their consent to the processing of their personal data, Article 6, paragraph 1, subparagraph 1, point (a) of the GDPR serves as the legal basis. If the processing of the personal data is necessary to fulfil a contract whose contractual party is the data subject, Article 6, paragraph 1, subparagraph 1, point (b) of the GDPR serves as the legal basis. This also applies to processing that is required to perform pre-contractual measures. If the processing is required to fulfil a legal obligation (e.g. a statutory retention obligation), Article 6, paragraph 1, subparagraph 1, point (c) of the GDPR serves as the legal basis. If the processing is required to safeguard a legitimate

interest on the part of Schleifring or a third party, and if this interest is not overridden by the need to protect the interests, fundamental rights and fundamental freedoms of the data subject, Article 6, paragraph 1, subparagraph 1, point (f) of the GDPR serves as the legal basis for the processing.

3.3 Duration of storage and deletion

Schleifring stores personal data for as long as these are required for the purpose for which they were collected or for as long as their storage is required by law (e.g. for tax and accounting purposes). If the processing is based on the consent of the data subject, the data will only be stored until the data subject revokes their consent, unless another legal basis for processing exists.

4. Deployment of the websites and creation of log files

When you open our websites, the browser used on your end device sends information to the server of our websites automatically. This information is saved temporarily in a so-called log file. The following information is gathered without any action on your part and stored until it is automatically deleted:

- IP address of the enquiring computer
- Date and time of access
- Name and URL of the retrieved file
- Browser- and client-specific information
- Time difference to Greenwich Mean Time (GMT)
- Language and version of the browser software
- Operating system used
- Content of the request (concrete page)
- Last page visited
- Data volume transmitted
- Access status

The above-mentioned personal data are processed in order to technically enable the websites to be used, to guarantee the technical security of the websites, and to create anonymized usage statistics to enable us to optimize the offering.

The legal basis for the collection of the personal data and their storage in log files is Article 6, paragraph 1, subparagraph 1, point (b) of the GDPR. In this way, Schleifring fulfils a contract concluded with you regarding the use of the website.

A further legal basis for above-mentioned data processing and, in particular, for the creation of anonymized usage statistics is Article 6, paragraph 1, subparagraph 1, point (f) of the GDPR. The processing is required to safeguard our legitimate interests. Schleifring pursues the legitimate interests of understanding the user behaviour and thus continually optimising the online offering.

This is not precluded by overriding fundamental rights and fundamental freedoms on the part of the users, as the categories to which the processed data belong are of a mainly technical nature and the processing is performed in an anonymized manner.

5. Use of cookies

5.1 Types of cookies

Schleifring use cookies on its website. These cookies are small text files that are saved on the user's end device (e.g. laptop, tablet, smartphone) when they visit the website. The cookies do not harm the end device and contain no viruses, Trojans or other malicious software. Information is stored in the cookie that in each case depends on the specific end device used.

The cookies used belong to the following functional groups:

5.1.1 Technical cookies

Technical cookies are required to enable you to display the website and thus to make key basic functions available, e.g. website navigation. The cookies enable the following data to be stored and transmitted: language settings, login information, page settings, content of the shopping basket, and other status information.

The purpose of technical cookies is to simplify the use of the website. Cookies are also used so that you can be identified each time you visit the website. Some of the websites' functions cannot be offered without technical cookies. For these functions it is necessary that your browser is recognised even after switching between websites.

5.1.2 Cookies for user preferences

Cookies for user preferences are used in order to recognise you and any settings made by you when returning to the website. This enables, for example, your preferences and searches to be saved or targeted product recommendations to be displayed.

5.1.3 Cookies for performance and statistics

Performance and statistics cookies are used in order to analyse the use of the website. This enables your usage behaviour on the website to be understood and makes it possible to determine where errors occur. The insights gained in this way allow us to make the website user-friendlier or to adapt information and services to the users' requirements.

5.1.4 Cookies for marketing purposes

These cookies are used to analyse your visit to the websites. The corresponding information is used to better tailor advertising on the website to the users' interests.

5.2 Cookie management

5.2.1 Cookie consent tools

The cookie consent tool Borlabs Cookie has been implemented on the website www.schleifring.de to allow you to control the use of cookies. This cookie consent tool is operated by Borlabs – Benjamin A. Bornschein, Rübenkamp 32, 22305 Hamburg, Germany. The tool shows a cookie list divided into functional groups and explains the purpose of these functional cookie groups as well as the individual cookies and the respective storage period. To use this cookie consent tool, it is technically necessary to save a cookie.

On the website www.schleifringonline.com the cookie consent tool from shopware is implemented. This cookie consent tool is operated by shopware AG, Ebbinghoff 10, 48624 Schöppingen, Germany.

5.2.2 Settings via the cookie consent tool

When you visit the websites, the cookie consent tool is displayed in a pop-up window. You can activate the cookies divided into functional groups by clicking on the relevant box. Technically necessary cookies are already saved when the website is called up; the relevant box is preactivated. If you deactivate technical cookies, the use of the websites or individual functions on the website may be restricted or excluded.

5.2.3 Options to withdraw consent or opt-out

If you have given your consent to the setting of cookies by clicking in a corresponding box, you can revoke this consent at any time by clicking in the box again in the cookie consent tool to remove the relevant check mark and thus deactivate the setting of cookies.

You also have the possibility to deactivate cookies directly at a cookie provider or to prevent the processing of data using browser plug-ins. Corresponding settings must be made on the cookie provider's website.

You also have the possibility to control and limit the use of cookies by making corresponding settings in your browser.

5.3 Legal basis for the use of cookies

The legal basis for the processing of personal data using technically necessary cookies is paragraph 6, paragraph 1, subparagraph 1, point (f) of the GDPR. The legal basis for the processing of personal data using cookies for other purposes when the user has given their consent to this is Article 6, paragraph 1, subparagraph 1, point (a) of the GDPR.

6. Description of the services and tools used

6.1 Borlabs Cookie

The website www.schleifring.de uses the application Borlabs Cookie, which sets a technically necessary cookie (Borlabs Cookie) to save your consents to the use of cookies if these have been given. Borlabs Cookie does not process personal data. The consents given when calling up the website are saved in the Borlabs Cookie. If you want to revoke these consents, you can delete the cookie in your browser. When you reload the website, you will once again be asked to give a cookie consent. The legal basis for the use of Borlabs Cookie is Article 6, paragraph 1, subparagraph 1, point (c) of the GDPR (fulfilment of a legal obligation).

6.2 Polylang

The website www.schleifring.de uses the application Polylang, which sets a technically necessary cookie. This cookie enables the language you have used or selected to be recognised and retained. Polylang is provided by WP SYNTEX, 28, rue Jean Sebastien Bach, 38090 Villefontaine, France. The provider's data protection information is available at <https://polylang.pro/doc/is-polylang-compatible-with-the-eu-cookie-law/>

Schleifring has a legitimate interest in optimising the user-friendliness of the websites and saving your language settings so that the selected language is used again next time you visit the website. The legal basis is thus Article 6, paragraph 1, subparagraph 1, point (f) of the GDPR. If the corresponding consent has been given, the processing is performed solely on the basis of Article 6, paragraph 1, subparagraph 1, point (a) of the GDPR; the consent can be revoked at any time.

6.3 Google Tag Manager

The website www.schleifring.de uses Google Tag Manager. This service enables website tags to be managed via a user interface. Google Tag Manager does not actually set cookies, only tags. Nor does it not collect personal data. The service triggers other tags, which in turn may collect data. However, Google Tag Manager does not access this data. If a deactivation was performed at the domain or cookie level, this remains in effect for all tracking tags implemented with Google Tag Manager.

6.4 Facebook plug-ins

Plug-ins from Facebook are integrated into the websites. The provider of this social network is Facebook Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland. According to Facebook the collected data will, however, also be transferred to the USA as well as to other third countries.

The Facebook plug-ins can be recognised by the Facebook logo or the "Like" button on the websites. An overview of the Facebook plug-ins is available here: https://developers.facebook.com/docs/Plug-Ins/?locale=de_DE.

When you visit the websites, a direct connection will be created between your browser and the Facebook server via the plug-in. Facebook will thus notified that you have visited this website using your IP address. If the click on the Facebook "Like" button while you are logged into your Facebook account, you will be able to link the contents of this website to your Facebook profile. This enables Facebook to assign your visit to this website to your user account. We have no knowledge of the content of the data transferred to or of its use by Facebook. For further information refer to Facebook's data privacy policy at: <https://de-de.facebook.com/privacy/explanation>.

If you do not want to allow Facebook to assign your visit to the websites to your Facebook user account, please log out of your Facebook user account.

Schleifring has a legitimate interest in the awareness of the company in the social media. The legal basis is thus Article 6, paragraph 1, subparagraph 1, point (f) of the GDPR. If the corresponding consent has been given, the processing is performed solely on the basis of Article 6, paragraph 1, subparagraph 1, point (a) of the GDPR; the consent can be revoked at any time.

If personal data are collected on these websites with the aid of the tool described here and they are transferred to Facebook, Schleifring and Facebook are jointly responsible for this data processing (Article 26 of the GDPR). The joint responsibility is strictly limited to the collection of the data and its transfer to Facebook. The processing by Facebook after transfer is not part of the joint responsibility. The parties' joint responsibilities have been defined in an agreement on joint processing. The terms of the agreement are available at: https://www.facebook.com/legal/controller_addendum

According to this agreement Schleifring is responsible for the provision of the data protection information when using the Facebook tool and for the secure implementation of the tool on its website in accordance with data protection regulations. Facebook is responsible for the data security of the Facebook products. The rights of the data subject (e.g. to request information) regarding the data processed by Facebook can be exercised directly against Facebook. If you exercise the rights of the data subject against Schleifring, we are obligated to forward this to Facebook.

The data transfer to the USA is governed by the EU Commission's standard contractual clauses. The details are available at:

https://www.facebook.com/legal/EU_data_transfer_addendum,

<https://de-de.facebook.com/help/566994660333381>,

<https://www.facebook.com/policy.php>.

6.5 XING

Our websites used the "Share" function of the social network XING. The provider is XING AG, Dammtorstraße 29-32, 20354 Hamburg, Germany.

If you click on the XING "Share" button when logged into your XING user account, you will be forwarded to a separate browser window in your user account and here you can share the material published on our website (e.g. from the "News" section) and are also able to add a comment. The plug-in will create a direct link between your browser and the XING server. XING will thus be notified that you have visited our website using your IP address. We have no knowledge of the content of the data transferred to or of its use by XING.

The legal basis for the integration of XING is Article 6, paragraph 1, subparagraph 1, point (f) of the GDPR. Schleifring has a legitimate interest in the awareness of the company in the social media. If the corresponding consent has been given, the processing is performed solely on the basis of Article 6, paragraph 1, subparagraph 1, point (a) of the GDPR; the consent can be revoked at any time.

For further information refer to XING's privacy policy at:

https://www.xing.com/app/share?op=data_protection.

6.6 LinkedIn

Our websites used the "Share" function of the social network LinkedIn. The provider is LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA.

If you click on the LinkedIn "Share" button when logged into your LinkedIn user account, you will be forwarded to a separate browser window in your user account and here you can share the material published on our website (e.g. from the "News" section) and are also able to add a comment. The plug-in will create a direct link between your browser and the LinkedIn server. LinkedIn will thus be notified that you have visited our website using your IP address. We have no knowledge of the content of the data transferred to or of its use by LinkedIn.

The legal basis for the integration of LinkedIn is Article 6, paragraph 1, subparagraph 1, point (f) of the GDPR. Schleifring has a legitimate interest in the awareness of the company in the social media. If the corresponding consent has been given, the processing is performed solely on the basis of Article 6, paragraph 1, subparagraph 1, point (a) of the GDPR; the consent can be revoked at any time.

For further information refer to LinkedIn's privacy policy at: <https://www.linkedin.com/legal/privacy-policy>.

6.7 YouTube

Videos are embedded in our websites which are stored on www.YouTube.com and which can be played directly from the websites. Before loading the video, the user can call up data protection information from YouTube or Google via a link in the corresponding window.

When you visit the website, YouTube receives the information that the corresponding subpage was called up. This occurs regardless of whether YouTube provides a user account that the user has used to log in or whether no user account exists. When the user is logged into Google, their data will be directly associated with their account. If the user does not want an association with their YouTube profile, they must log out before activating the button. YouTube stores the data as usage profiles and uses them for the purposes of advertising, market research and/or the demand-oriented design of its website. Such evaluation is carried out in particular (even for users who are not logged in) in order to provide demand-oriented advertising and to inform other users of the social network about your activities on the websites. The user has the right to object to the creation of these usage profiles. You must contact YouTube to exercise this right.

Further information on the purpose and scope of data collection and processing by YouTube can be found in Google's privacy policy. There you will also find further information about your rights as a user and settings that can be used to protect your privacy:

<https://www.google.de/intl/de/policies/privacy>.

7. Contact form and e-mail contact

You can contact Schleifring using either the contact form provided on the website or via the e-mail address on the website or in the imprint. The information required is specified in the contact form. Fields marked as mandatory have to be completed, all other fields may be filled out on a voluntary basis.

The processing of the personal data is solely for the purpose of handling your enquiry. The data is stored for the purpose of processing your enquiry and contacting you if required.

The personal data supplied via the contact form or e-mail will be deleted as soon as the conversation with you has been dealt with. If statutory retention obligations exist, the data will be stored for the duration of the applicable statutory retention period.

The legal basis for the processing of personal data sent by e-mail or using the contact form is paragraph 6, paragraph 1, subparagraph 1, point (f) of the GDPR. We have a legitimate interest in our ability to hold the conversation initiated by you.

8. Newsletter

Subject to availability, you may subscribe to the newsletter offered on the website. To this purpose, we require your e-mail address as well as information that enables us to confirm that you are the owner of the e-mail address and agree to receipt of the newsletter. If additional data are required, these will only be collected on a voluntary basis. The data will be used to dispatch the newsletter and will not be disclosed to third parties.

The processing of the data collected to enable the newsletter to be dispatched will be performed solely on the basis of your consent. The legal basis is Article 6, paragraph 1, subparagraph 1, point (a) of the GDPR. You can revoke your consent at any time, for example by clicking on the corresponding cancellation link in the newsletter received.

The data collected for the purpose of newsletter subscription are stored until such time that you cancel the subscription, at which point they are deleted. Your e-mail address will be still stored after you have cancelled the subscription in order to prevent the newsletter being sent to you in future. The legal basis for this is Article 6, paragraph 1, subparagraph 1, point (f) of the GDPR. We have a legitimate interest in observing the statutory regulations regarding the dispatch of newsletters. You have the right to object to this storage if your interests in preventing the storage override our legitimate interest.

9. Online shop Schleifring Online

9.1 Registration, customer account, orders

To be able to place orders in the online shop, it is necessary to register and create a customer account. You can create the customer account on the online shop's website. The data required are specified in the online form. The data required comprise, in particular, title, first name and surname, e-mail address, the choice of a password, business address, invoice address and sales tax (VAT) identification number. The sales tax (VAT) identification number is only required if the customer is based in the EU.

The data are collected and processed to enable us to conclude and perform the contract resulting from an order placed in the online shop. The data is also used to confirm your status as a business customer, as the online shop is not accessible to private consumers. The contact data is required, among other purposes, to enable us to contact you with regard to queries within the scope of the conclusion of the contract and its performance.

The legal basis for the processing of personal data is paragraph 6, paragraph 1, subparagraph 1, point (b) of the GDPR, as the processing is required either to fulfil the contract between you and us or to perform pre-contractual measures that result from your enquiry.

You can correct, change or supplement the data in your customer account at any time. You can partially delete your data or even completely delete your customer account. If you have made purchases via the customer account, the relevant data remains stored to the extent that we are obliged to observe statutory retention obligations in this context. The legal basis for this is Article 6, paragraph 1, subparagraph 1, point (c) of the GDPR (fulfilment of a legal obligation).

9.2 Creditworthiness check

When you register as a new customer or place an order in the online shop as a registered customer that exceeds a specified payment amount, we verify your address and perform a creditworthiness check. This is performed by an external service provider: Creditreform Boniversum GmbH, Hellersbergstraße 11, 41460 Neuss, Germany. The data required for the verification is disclosed to this service provider. In particular, this comprises the name and address of the company as well as other contact data if required. Further information on data processing by the external service provider is available here: <https://www.boniversum.de/eu-DS-GVO/>

The legal basis for the processing and disclosure of your personal data is Article 6, paragraph 1, subparagraph 1, point (b) of the GDPR (processing within the scope of pre-contractual measures as well as for fulfilment of a contract) as well as Article 6, paragraph 1, subparagraph 1, point (f) of the GDPR. We have a legitimate interest in reducing the risk of payment defaults by means of a creditworthiness check.

10. Job applications

You can send us enquiries using the contact form in the “Career” section. You can also send us your job application documents via e-mail. You will need to provide us with personal data in both cases, in particular your contact data and information about your person. In general, the following data is collected and processed:

- Surname, first name, title (if applicable)
- Date of birth
- Home address
- Private telephone number
- Private e-mail address
- If applicable, information pertaining to special requirements/knowledge required for the vacancy in question
- Previous/present employer
- Application documents (cover letter, curriculum vitae, references, certificates, documentary proof of a severe disablement if applicable, other documents as required)

Within the scope of the job application process we can also use data from other sources, especially data from career-oriented social networks (e.g. XING or LinkedIn) in which you have published data about your person, or data from other publicly accessible sources (e.g. online job fairs).

Your data will initially only be processed for the purpose of the job application process. If your application is successful, they will become part of your personnel file and will be used to conduct and terminate the employment relationship. They will then be deleted according to regulations that apply to personnel records. If we are not able to offer you a position at the present time, we process your data for up to six months after sending the rejection in order to protect ourselves against potential legal claims (especially claims according to the Allgemeines Gleichbehandlungsgesetz (German General Act on Equal Treatment)), in particular against alleged discrimination during the job application process.

Depending on the necessity, our personnel department, the specialist department in which you have applied for a job, the works council and the accounting department have access to your data. To the extent that it is technically necessary, our administrators and data processors are also allowed to access data that is processed using IT.

The legal bases for data processing during the job application process and within the scope of the personnel file are Section 26, subsection 1, sentence 1 of the Bundesdatenschutzgesetz (German Federal Data Protection Act) and Article 6, paragraph 1, subparagraph 1, point (b) of the GDPR, and if you have given consent, for example by sending information that is not necessary for the job application process, Article 6, paragraph 1, subparagraph 1, point (a) of the GDPR. You can revoke your consent at any time. The legal basis for the use of data from your public profile in a career-oriented social network is Article 6, paragraph 1, subparagraph 1, point (f) of the GDPR. We have a legitimate interest in creating a basis for decision-making with regard to the establishment of an employment relationship. The legal basis for the data processing after a rejection is Article 6,

paragraph 1, subparagraph 1, point (f) of the GDPR. The legitimate interest is the defence against legal claims.

We will not use your data for automated decision-making or profiling purposes, nor will we disclose them to third parties. You are not obligated to provide us with personal data. However, we can only assess your suitability for the position in question if we receive relevant information, especially regarding your education, work experience and your competencies. If we do not receive your contact data, we will not be able to include you in the job application process.

11. Disclosure of data to third parties

Your personal data will be not disclosed to third parties for purposes other than those listed below. We only disclose your personal data to third parties if:

- You have given your express consent pursuant to Article 6, paragraph 1, subparagraph 1, point (a) of the GDPR.
- The disclosure pursuant to Article 6, paragraph 1, subparagraph 1, point (f) of the GDPR is required to establish, pursue or defend legal claims and there is no reason to believe that you have an overriding interest warranting protection with regard to the non-disclosure of your data.
- In the event that there is a legal obligation to disclose your data pursuant to Article 6, paragraph 1, subparagraph 1, point (c) of the GDPR, and
- this is legally permissible and required under Article 6, paragraph 1, subparagraph 1, point (b) of the GDPR for the execution of contractual relationships with you.

12. Rights of the persons affected

You have the right:

- to request information about your personal data processed by us in accordance with article 15 of the GDPR. In particular, you can demand information on the processing purposes; the category of personal data; the categories of recipients to whom your data has been or will be disclosed; the planned retention period; the right to rectification, deletion, limitation of processing or objection; the existence of a right to complain; the source of your data insofar as it has not been collected by us as well as the existence of automated decision-making including profiling; and, where appropriate, meaningful information about its details;
- to demand immediate correction of incorrect personal data or completion of your personal data saved by us in accordance with article 16 of the GDPR;
- to demand the deletion of your personal data held by us, insofar as the processing is not required to exercise the right to freedom of expression and information, to fulfil a legal obligation, for reasons of public interest or to establish, pursue or defend legal claims in accordance with article 17 of the GDPR;
- to demand the restriction of the processing of your personal data in accordance with Article 18 of the GDPR insofar as the accuracy of the data is disputed by you, the processing is unlawful, but you reject its deletion and we no longer need the data, but you require it to

establish, pursue or defend legal claims or you have objected to the processing under article 21 of the GDPR;

- to receive your personal data provided to us in a structured, common and machine-readable format or to demand the transfer to another party responsible in accordance with Article 20 of the GDPR;
- to revoke your consent given to us at any time in accordance with article 7, paragraph 3 of the GDPR. As a result, we are no longer allowed to continue the data processing based on this consent in future; and
- to complain to a supervisory authority in accordance with Article 77 of the GDPR. As a rule, you can contact the supervisory authority responsible for your usual place of residence or workplace or for our company headquarters.

13. Right to object

You have the right to object at all times, on grounds relating to your particular situation, against the processing of your personal data performed on the basis of Article 6, paragraph 1, subparagraph 1, point (b) or point (f) of the GDPR; this also applies to profiling based on these provisions. We shall no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or the processing is for the purpose of the establishing, exercising or defending legal claims.

Where personal data are processed for direct marketing purposes, you have the right to object at all times to processing of your personal data for the purpose of 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, the personal data will no longer be processed for such purposes.

If you would like to exercise your right of revocation or objection, please send an e-mail to datenschutz@schleifring.de.

14. Data security

For your visit to our website we use the widespread SSL (Secure Socket Layer) method in conjunction with the highest level of encryption supported by your browser.

In general, this is a 256-bit encryption. If your browser does not support 256-bit encryption, we use 128-bit v3 technology instead. Whether a single page of our website is transmitted in encrypted form is shown by the way your browser is depicted, for example by a closed key or padlock icon in the lower status bar.

We also take appropriate technical and organisational security measures to protect your data against accidental or intentional manipulation, partial or total loss, destruction or against unauthorized access by third parties. Our security measures are continuously improved in line with technological developments.

15. Up-to-dateness of and changes to this data protection policy statement

This data protection policy is currently valid and has the status April 2021.

Due to the further development of our website and services or due to changed legal or regulatory requirements, it may become necessary to change this data privacy statement. The currently valid data privacy statement can be called up at any time on our website <https://www.schleifring.de/en/privacy-policy/> and printed out.