

## **Data protection policy for the platform operated by Döhler GmbH (Doehler Platform)**

### 1. Collection and processing of your personal data

You can visit our Doehler Platform without providing information about yourself. We only save access data in server log files, e.g. the name of the file requested, the date and time of the request, the data volume transferred and the provider from which the request comes. This data is analysed exclusively to secure error-free operation of the site and to improve our service. It does not allow us to derive any information about who you are.

If you register as a corporate user and/or single user, order goods, subscribe to our newsletter via the double opt-in or wish to use specific functions of our Doehler Platform, personal data is collected. You can find more detailed information about the nature and extent of data collected on the respective pages with the input screens.

#### 1.1 Consent

By entering your personal and company data and expressing your explicit consent e.g. with the click of a mouse in line with your self-registration on the Doehler Platform, you are giving your personal consent and the consent of your company that Döhler GmbH, as the operator of the Doehler Platform, can process and use your personal data for the execution and processing of your requests, orders and digital services on the Doehler Platform, plus the additional purposes detailed below.

The text of the consent is as follows:

I agree to the applicability of the data protection policy.

#### 1.2 Use and transfer of your data; newsletter

We use the data provided by you exclusively for our own purposes, particularly for the execution and provision of our digital services on the Doehler Platform, for the purposes of project work on the Doehler Platform and for the purposes of preparing and processing contracts initiated or concluded via the Doehler Platform.

In order to ensure the proper, efficient operation of the platform, specifically improve our services (targeted marketing) and counter misuse, your user behaviour and your actions are traceable for us within

the secure area of the Doehler Platform and in part also for other invited, activated single users.

For the purposes of project and/or order processing, your data can be transferred to other participating companies (corporate users) and single users of the Doehler Platform where necessary and set out in the General Terms and Conditions of Use.

Based on specialist processing within the Doehler Group, we will also pass your data on to affiliated companies within the Doehler Group. Doehler Group means the group of companies in which Döhler Group SE (Darmstadt, Germany) is either directly or indirectly a majority shareholder.

Corporate users, single users ]and, of course, our affiliated companies are contractually obliged to process the data obtained via the Doehler Platform exclusively for its intended purpose and in compliance with the law and to pass this contractual obligation on data protection to the corporate users and single users and employees acting in their name.

This shall not affect any contractual confidentiality and non-disclosure obligations.

At the same time, we will not pass your personal data on to third parties unless there is a legal or official requirement to do so or you have given additional explicit consent.

With your special consent in line with the double opt-in procedure, we use your email address to send out our newsletter, from which you can unsubscribe at any time by clicking on the deactivation link provided in every newsletter.

The text of the consent is as follows:

I would like to subscribe to the Doehler newsletter.

### 1.3 Credit card data

We do not save credit card data; it is collected and processed directly by our payment service provider.

### 1.4 Use of data for postal advertising

We also reserve the right to save your first and last name, your postal address and – providing we have received this additional information from

you in line with the contractual relationship – your title, academic qualifications, year of birth and your professional, industry or business qualification in summarised lists and to use them for our own advertising purposes, e.g. for sending interesting offers and information on our products by post.

### 1.5 Revocation and objection to advertising

You have the right to revoke your consent at any time with effect for the future without having to provide reasons. An informal email to [datenschutz@doehler.com](mailto:datenschutz@doehler.com) is sufficient. As part of your revocation, we will delete all your personal data immediately and no longer process it.

You can also revoke your consent to the use of your data for all or specific future advertising and market and opinion research purposes in writing at any time. An informal email to [datenschutz@doehler.com](mailto:datenschutz@doehler.com) is sufficient. If you have revoked your consent, the use of your data for this purpose is unauthorised.

## 2. Data security

For the purposes of the order process, your personal data is transmitted in encrypted form over the internet via an SSL process (Secure Socket Layer). We secure our Doehler Platform and other systems against loss, destruction, access, modification and distribution of your data by unauthorised persons by means of technical and organisational measures. Your customer account can only be accessed by entering your personal password. You should always keep your access information confidential and close the browser window once you have finished communicating with us, especially if you share the computer with others or use it publicly.

## 3. Use of cookies

In order to make visiting our Doehler Platform attractive and efficient and enable the use of specific functions, we use cookies on various pages. These are small text files which are stored on your computer or end device. Some of the cookies we use are deleted at the end of the browser session, i.e. when you close your browser (these are known as session cookies). Other cookies are stored on your computer or end device and allow us to recognise your browser the next time you visit (these are known as persistent cookies). You can configure your browser such that

you are informed about the saving of cookies and can decide on an individual basis whether to accept cookies or reject the use of cookies in certain cases or in general. Not accepting cookies can limit the functionality of our Doehler Platform.

### 3.1 Google Analytics

The Doehler Platform uses functions of the Google Analytics web analysis service. The provider of this service is Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

Google Analytics uses cookies. These are text files which are stored on your computer to enable an analysis of your use of the website. The information generated by the cookie about your use of this website is generally transferred to a Google server in the USA and saved there.

Please note that this website uses Google Analytics which has been extended with the code "gat.\_anonymizeIp();" to ensure anonymous recording of IP addresses (known as IP masking). Google anonymises your IP address within the EU or the contract states of the European Economic Community by truncating it. Only in exceptional cases is the complete IP address transmitted to a Google server in the USA and then shortened there.

You can find more information on the handling of user data by Google Analytics in the Google guidelines on safeguarding your data: <https://support.google.com/analytics/answer/6004245?hl=en>

Objecting to data collection – browser plugin

You can prevent cookies being saved by changing a setting in your browser software, but please note that this may mean you are not able to use all the website functions to their full extent. You can also prevent the recording of the data generated by the cookie relating to your use of the website (including your IP address) and the processing of this data by Google by downloading and installing the browser plugin from the link below: <https://tools.google.com/dlpage/gaoptout?hl=en>

Further information on the use of data for advertising purposes by Google and configuration and opt-out options can be found on Google's website: <https://policies.google.com/technologies/partner-sites?hl=en/> ("How Google uses information from sites or apps that use our services"), <https://policies.google.com/technologies/ads?hl=en> ("How Google uses cookies in advertising")

and <https://adssettings.google.com/anonymous?hl=en> (“Ad personalization settings”).

You can prevent data acquisition by Google Analytics by clicking on the following link. An opt-out cookie is installed, which prevents your data from being collected when you visit this website in future: deactivate Google Analytics.

### 3.2 Google Maps

Our website uses the component “Google Maps” by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043 USA or Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland in the European Union.

Google sets a cookie in order to process the user configuration and data each time the page with the integrated “Google Maps” component is displayed. As a general rule, this cookie is not deleted by closing the browser, but rather expires after a certain time, as long as it is not previously manually deleted by you. If you do not agree with this processing of your data, you may choose to deactivate the “Google Maps” service and thereby prevent the transfer of data to Google. To do this, you must deactivate the JavaScript function in your browser. However, we would like to point out that in this case you will not be able to use “Google Maps” or at least only to a limited extent. The use of “Google Maps” and the information obtained through “Google Maps” is according to Google’s Terms of Service: <https://policies.google.com/terms?hl=en> as well as the additional Terms of Service for “Google Maps”: [https://www.google.com/help/terms\\_maps/?hl=en](https://www.google.com/help/terms_maps/?hl=en)

### 3.3 Flashtalking

We use the Flashtalking platform to display advertisements and analyse campaigns and use cookie-based and non-cookie-based technologies to identify devices. You can find more information on the use of Flashtalking data and your selection options in the privacy policy for consumers: <https://www.flashtalking.com/consumer-privacy>

### 3.4 Use of various social media plugins

On our website you will find links to the social media services of Facebook, Twitter, YouTube, Instagram, LinkedIn and Xing. You can identify links to the websites of the social media services by their respective corporate logo. Follow these links to access our corporate pages on the respective social media service. Clicking a link to a social media service establishes a connection to the servers of the social media service. This transfers the information to the servers of the social media service that you have visited our website. In addition, further data is transferred to providers of the social media service. This includes information such as:

- \* the address of the website on which the activated link is located
- \* the date and time at which the website was accessed or the link activated
- \* information on the browser and operating system used
- \* the IP address

If you are already logged into the respective social media service when activating the link, the social media service provider may be able to determine your user name, and potentially your real name, on the basis of the transferred data, and assign this information to your personal user account on the social media service. You can preclude the possibility of this assignment to your personal user account by logging off from your user account beforehand.

The servers of the social media services are located in the USA and other countries outside the European Union. The social media service provider may therefore also process your data in countries outside the European Union. Please note that companies in these countries are subject to data protection laws which generally do not protect personal data to the same extent as is the case in the member states of the European Union.

Please note that we have no influence on the scope, type and purpose of data processing by the social media service provider. Further information on the use of your data by the social media services integrated on our website can be found in the privacy policy of the respective social media service.

We also use the ClickToTweet function from Twitter. ClickToTweet allows us to draft the ideal tweet, which is integrated as a link on our website. When you click on the link, the draft tweet is opened in Twitter and can be directly published there. Using ClickToTweet, you can share texts from

our website on Twitter with a single click. However, no personal data is transferred during this process.

### Our social media presence

We are present on various “social media” in order to communicate with customers, interested parties and users logged in there and inform them of our offers.

We would like to point out that you use these platforms and their functions under your own responsibility. This particularly applies for the use of interactive functions (e.g. commenting, sharing, voting).

In addition, we would like to point out that your data can potentially be processed outside the European Union while doing so.

Your data may also be processed for market research and advertising purposes. For example, your usage behaviour and the resulting interests may be used to create user profiles. These can then allow advertisements to be displayed inside and outside the platforms that presumably correspond with your interests. Cookies are generally saved on your computer for this purpose. Regardless of this, data that is not directly collected from your end device may also be stored in user profiles (particularly if you are a member of the respective platform and are logged in).

As the provider of this information service, we record and process no further data from your use of our service.

The processing of the users’ personal data is based on our legitimate interests in the effective information of the users and communication with the users in accordance with Article 6(1)(f) EU GDPR. If the respective providers request your consent to the processing of data (i.e. your consent by, for example, checking a box or clicking a confirmation button), the legal basis for processing is Article 6(1)(a) and Article 7 EU GDPR.

#### 3.4.1 Facebook

The Doehler Platform uses social plugins (“plugins”) from the social network facebook.com operated by Meta Platforms, Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA or Meta Platforms Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland in the European Union (“Facebook”). The Facebook plugins can be identified by one of the

Facebook logos (either a white “f” on a blue square or a “thumbs up” sign) or are marked as “Facebook Social Plugin”. The list and the appearance of the Facebook Social Plugin can be viewed here: [developers.facebook.com/docs/plugins?locale=en\\_US](https://developers.facebook.com/docs/plugins?locale=en_US).

If a website user accesses a service containing a plugin of this type, their browser establishes a direct connection to the Facebook servers. The content of the plugin is transferred directly to your browser from Facebook and incorporated into the page by your browser. This means that the provider has no influence on the scope of the data gathered by Facebook via this plugin and therefore provides information to the user based on its level of knowledge.

The embedding of the plugin means Facebook receives the information that a user has accessed the relevant page on the website. If the user is logged into Facebook, Facebook can assign the visit to their Facebook account. If users interact with the plugin, for example by pressing the like button or submitting a comment, the relevant information is transferred by your browser directly to Facebook and saved there. If the user is not a Facebook member, Facebook can still find out and store their IP address. According to Facebook, only an anonymised IP address is saved in Germany.

The purpose and extent of data collection and the further processing and use of the data by Facebook, plus users’ rights and settings options to protect their privacy, can be found in Facebook’s privacy policy: <https://www.facebook.com/privacy/policy/>.

If a user is a Facebook member and does not wish Facebook to collect data about them via this service and link it to their membership data stored on Facebook, they must log out of Facebook before accessing the website.

It is also possible to block Facebook social plugins using browser add-ons such as the “Facebook Blocker”.

### 3.4.2 Twitter

Our website employs the buttons provided by the social network, Twitter. Twitter is a service of Twitter Inc., 795 Folsom St., Suite 600, San Francisco, CA 94107, USA or Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07, Ireland in the European Union. The bookmarks are indicated by the Twitter logo (a stylised blue bird). Clicking on this logo enables the user to share an

article or a page from this offer on Twitter, or to follow the provider on Twitter. If a user accesses a website from this web presence which contains a button like this, the browser connects directly to the Twitter servers. The content of the Twitter buttons is transferred directly to the user's browser by Twitter. We have no control over the extent of the data that Twitter collects using this plugin. If you are logged in to Twitter, Twitter can assign this visit to your Twitter account. Please check the Twitter data privacy policy for further information on the reason for collecting data and the extent to which data is collected, the further processing and use of the data by Twitter, as well as your rights and settings options for protecting your privacy. This can be found at <https://twitter.com/en/privacy>. If you wish to prevent Twitter collecting data about you through your interaction with our website, you must first log out of Twitter before visiting our website, and, if required, delete the cookies set by Twitter on your PC.

### 3.4.3 LinkedIn

Our website employs plugins provided by the social network, LinkedIn. LinkedIn is a service of LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA, hereinafter "LinkedIn". LinkedIn plugins can be identified by the LinkedIn logo or the "Share" button ("Recommend") on this website. If you visit this website, the plugin creates a direct connection between your browser and the LinkedIn server. LinkedIn receives the information that you have visited this website using your IP address. If you click on the LinkedIn "Share" button while logged in to your LinkedIn account, you can link the contents from this website to your LinkedIn profile. This enables LinkedIn to associate your visit to this website to your LinkedIn user account.

If you are a member on LinkedIn and do not want LinkedIn to connect data collected on our web presence with your membership data stored on LinkedIn, you must first log out of LinkedIn before you visit our website.

Information on the collection and use of data by the platform or plugins is available in the privacy policy: <https://www.linkedin.com/legal/privacy-policy>

### 3.4.4 Other social media plugins

Where we use other social media plugins, you can find more detailed information on data protection in the relevant privacy policies of these

providers. If you cannot find them, please contact us in confidence at [datenschutz@doehler.com](mailto:datenschutz@doehler.com).

### 3.5 Hotjar

We use Hotjar in order to better understand our users' needs and to optimise the service and experience of using this website. The Hotjar technology helps us better understand our users' experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to align our service with the feedback of our users. Hotjar uses cookies and other technologies to collect data on our users' behaviour and their devices. This includes a device's IP address (which is collected and saved exclusively in an anonymised form while you are using the website), device screen size, device type (unique device identifiers), browser information, geographic location (country only) and the preferred language used to display our website. Hotjar stores this information in a pseudonymised user profile on our behalf. Hotjar is contractually forbidden to sell any of the data collected on our behalf.

For further details, please see the "About Hotjar" section on Hotjar's support site.

To prevent the analysis of your user behaviour, you can disable Hotjar on this page.

### 3.6 Analysis by WiredMinds

Our website uses counting pixel technology provided by WiredMinds GmbH ([www.wiredminds.de/en](http://www.wiredminds.de/en)) to analyse visitor behaviour. The IP address of the visitor is processed in this context. The processing occurs only for the purpose of collecting company-based information such as the company name. IP addresses of natural persons are excluded from any further processing by means of a whitelist. An IP address is not stored in LeadLab under any circumstances. While processing data, it is our utmost interest to protect the data protection rights of natural persons. Our interest in processing data is based on Article 6(1)(f) EU GDPR. At no time is it possible for us to draw conclusions about an identifiable person based on the collected data. WiredMinds GmbH uses this information to create anonymous usage profiles of the visit behaviour on our website. Data obtained during this process is not used to personally identify visitors of our website.

You can prevent data acquisition by WiredMinds by clicking on the following link. A functionally necessary cookie will be set to permanently ensure no tracking by WiredMinds LeadLab occurs on this website: [exclude from tracking](#)

#### 4. Other third-party services

We have included YouTube videos in our online service, which are available at <http://www.youtube.com>, and which can be viewed directly from our website. All of these videos are included in the “expanded data protection mode”, which means that no data on the user shall be transferred to YouTube if you do not watch the videos.

Our website only establishes the connection to YouTube. YouTube is a service of Google Inc., Amphitheatre Parkway, Mountain View, CA 94043, USA or of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland in the European Union.

The “expanded data protection mode” has been activated for all YouTube videos on our website. YouTube provides this expanded data protection mode, thus ensuring that YouTube will not store cookies containing personal data on your computer. The IP address is transferred when the website is called up and is used for embedding the videos. This IP address cannot be assigned, provided you have not logged in with YouTube or another Google service prior to calling up the website or are permanently logged in.

As soon as you watch an embedded video by clicking Play, YouTube, by means of the expanded data protection mode, will only store cookies that do not contain any personal data on your computer. These cookies can be prevented through the corresponding browser settings and add-ons.

Additional information on the embedding of YouTube videos can be found on YouTube’s information page.

#### 5. Rights of data subjects: right of access, rectification, blocking or erasure; making contact

In accordance with the applicable statutory data protection regulations, you have the right to obtain information as to whether your personal data has been stored and, if so, which data, free of charge. In the non-public area of our Doehler Platform, you can view your master data, orders and data recorded about your actions at any time.

You are entitled to have any incorrect data about you corrected if it is incorrect or incomplete. To do this, please contact us and let us know the correct personal data. The correction is made immediately, subject to a plausibility check.

You also have the right to request the erasure of personal data held about you. For example, if the data was saved without authorisation or the knowledge of your personal data is no longer required in order to fulfil the purpose for which it was saved or to fulfil the tasks for which the (public) controller is responsible. In the case of a revocation of consent, we will also immediately erase your personal data (see 1.5).

Instead of erasure, you have the right to have your personal data blocked if erasure would contravene mandatory storage periods, there is reason to assume that the erasure would affect protected interests of the data subject, erasure is not possible or would be unreasonably difficult or it is not possible to determine whether the data is correct or incorrect.

If you have any questions on the collection, processing or use of your personal data, if you have any questions on your rights as a data subject, if you wish to exercise your rights (access, rectification, blocking or erasure of data), or if you would like to revoke consent or object to given consent, please contact: [datenschutz@doehler.com](mailto:datenschutz@doehler.com)

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 EU 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 EU GDPR.

## 6. Information about the controller

Döhler GmbH

Riedstraße 7–9

64295 Darmstadt

Authorised representatives and directors:

Martin Sonntag

Marco Schmidt

Dr Michael Merget

Jochen Bitzel

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