

# Privacy Policy for Business Partners and Suppliers

Dear Sir or Madam,

data protection is an important concern for us. With the following information we would like to give you an overview of how we process your personal data and which rights you have under data protection law. Data processing takes place when you contact us, conduct contractual negotiations with us and/or have made contractual agreements with us and data of natural persons are processed in this context.

Which data is processed in detail and in what way it is used depends largely on the agreed services. Therefore, not all parts of this information will apply to you.

## 1. Who is responsible for data processing and whom can I contact if I have questions about data protection?

The person responsible for data processing within the meaning of Art. 4 (7) GDPR is the company named in the e-mail signature or the respective company with which you are initiating or conducting a business relationship.

You can reach the data protection officer/coordinator at E. Breuninger GmbH & Co.  
Data Protection Officer  
Marktstr. 1 - 3, 70173 Stuttgart  
Phone: +49 711 211 0  
e-mail: [datenschutz@breuninger.de](mailto:datenschutz@breuninger.de)

## 2. General information and data categories

As a matter of principle, we collect your data from yourself. Under certain circumstances, however, it may also be necessary to process personal data that we receive from other companies, authorities or other third parties, for example credit agencies, tax offices or similar.

Data processing operations may concern

- Personal and contact information (e.g. surname, first name, address, telephone, fax, e-mail address, function, position),
- Bank details and payment information (e.g. account holder, IBAN, SEPA mandates, payment method, payment history),
- Contract and billing data (e.g. supplier, order and registration number, contract history, billing information, claims settlement),
- Company and industry information (e.g. industry sector, key financial figures, number of employees, IT infrastructure),
- Legitimation and authentication data (e.g. excerpts from the commercial register, identity card data),

as well as other data comparable with the above categories, which are necessary for the handling of business relations.

You always have the choice of communicating with us by e-mail, telephone or regular mail. For technical reasons, communication by e-mail is sometimes not encrypted.

## 3. For which purpose do we process your data and what is the legal basis for this?

We process personal data in accordance with the provisions of the General Data Protection Regulation (GDPR) and the Federal Data Protection Act (BDSG).

### 3.1 Data processing for the performance of a contract, Art. 6 (1) lit. b) GDPR

The data processing is carried out to the extent that it is necessary for the initiation and performance of contracts regarding the procurement of goods and other services as well as contracts regarding the provision of services. The individual purposes that are pursued by data processing result from the respective contractually agreed purposes for the performance of our business relations.

### 3.2 Data processing based on the legitimate interests of the data controller, Art. 6 (1) lit. f) GDPR

It may be necessary to process personal data provided by you beyond the actual fulfilment of the contract. Our legitimate interests in this context may in particular be the following:

- Business organization and business communication
- Measures for the further development of products and services
- Market research and opinion research
- Provision of information tailored to your needs about products and services, invitations to events and activities of interest to you
- Consultation of and data exchange with credit agencies to determine creditworthiness or non-payment risks
- Examination and assertion of legal claims (e.g. within the scope of the settlement of claims),
- Defense in legal disputes,
- Measures to ensure building and facilities security (e.g. video surveillance, access control),
- Measures for the implementation of the house rules

### 3.3 Data processing based on your consent, Art. 6 (1) lit. a) GDPR

If we give a natural person the opportunity to give consent to the processing of personal data, we process the data covered by the consent solely for the purposes stated in the consent.

Please note that

- the granting of consent to us is voluntary
- Please note that the consents refusal or later revocation of consent may, however, be associated with consequences, about which we will inform you before consent is granted and
- that a consent given to us can be revoked at any time with effect for the future, e.g. by notification by regular post, fax or e-mail, or by using one of the contact channels mentioned on the first page of this Privacy Policy.

### **3.4 Data processing necessary for compliance with a legal obligation, Art. 6 (1) lit. c) GDPR**

In individual cases, the purposes of data processing result from legal requirements. These legal requirements include, for example, the fulfilment of storage and identification obligations, e.g. due to requirements for the prevention of money laundering, tax control and reporting obligations and data processing due to requests from authorities.

### **4. Is there an obligation to provide personal data?**

Within the scope of our business relationship, you must provide us with those personal data which are necessary for the commencement, performance and termination of a business relationship and for the fulfilment of the associated obligations which we are legally obliged to collect or which we are entitled to collect on the basis of legitimate interests. Without this data we will generally not be able to enter into a business relationship with you.

### **5. Who gets access to your personal data?**

Within the company, access to your personal data is granted to those departments that need the personal data to fulfil our contractual and legal obligations. Service providers and agents employed by us may also receive personal data for these purposes.

Your personal data may also be transferred to our associated companies in order to fulfil contractual and legal obligations.

Please note that if we share your personal data with recipients outside our company, we will only pass on required personal data in compliance with the applicable data protection regulations, i.e. if this disclosure is necessary to fulfil our contractual and legal obligations or to protect our legitimate interests.

### **6. Is your personal data transferred to a third country?**

If we transfer your personal data to data recipients outside the European Economic Area (EEA), the transfer will only take place if the EU Commission has determined that an adequate level of data protection is ensured in the non-EEA country or if the special requirements of Art. 49 GDPR are met.

### **7. How long will your personal data be stored?**

Personal data required for the conclusion and execution of contracts with business customers, suppliers and business partners or for the examination of offers or invitations to tender are generally stored for the term of the contractual relationship and for a maximum of 15 years beyond that.

Personal data from contracts with a term of more than 5 years is kept for 35 years from the beginning of the contract.

In individual cases (e.g. in the event of a legal dispute), your personal data may also be processed beyond this.

### **8. Which data protection rights can you assert as a data subject?**

In accordance with Art. 15 DSGVO, you have the right to request information free of charge from us about the personal data we have stored about you.

Furthermore, if the legal requirements are fulfilled, you have the right to rectification (Art. 16 GDPR), the right to erasure (Art. 17 GDPR) and the right to restriction of the processing of your personal data (Art. 18 GDPR).

If you have provided the personal data, you may have a right to data portability (Art. 20 GDPR).

In addition, there is a right of appeal to a competent data protection supervisory authority. The competent data

protection authority is the data protection authority of the country in which you live or in which the person responsible for data processing is based.

### **9. further information**

Should this Privacy Policy be supplemented or updated, or your personal data be processed for purposes other than those listed here, you will be informed separately in an appropriate manner.

As of April 2020