

## **Privacy policy for customers and other stakeholders**

With the following information, we would like to give you an overview of the processing of your personal data by us and your rights under the Data Protection Act.

### **Who is responsible for data processing and who can I contact?**

Responsible is

NORDWEST Handel AG  
Robert-Schuman-Straße 17  
44263 Dortmund  
Tel.: +49 231 2222 3001  
E-Mail: info@nordwest.com

You can reach our data protection officer under

datarea GmbH  
Meißner Straße 103, 01445 Radebeul  
Tel.: +49 351 20 25 14 26  
E-Mail: info@datarea.de

### **Which sources and data do we use?**

We process personal data that we receive from our customers and business partners as part of our business relationships. In addition, we process - as far as necessary for the provision of our services - personal data that we legitimately gain from publicly available sources (eg debtor directories, land registers, trade and association registers, press, internet) or those from other companies or third parties (For example, a credit reference agency) entitled to be transmitted.

Relevant personal data are personal data (name, address and other contact details, date and place of birth and nationality), credentials (eg ID data), authentication data (eg signature sample) and order data (eg payment order). In addition, this may include data from the fulfillment of our contractual obligations, information about their financial situation (eg credit ratings, scoring or rating data), credit-related data (eg income and expenses), documentation data (eg advisory report) and other data comparable to the above categories.

### **What do we process your data for (purpose of processing) and on what legal basis?**

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

- a) for the fulfillment of contractual obligations (Article 6 (1) (b) DSGVO))

The processing of data is carried out to fulfill the contractual obligations between NORDWEST Handel AG and our customers / business partners. This includes Processing of orders in the field of steel, construction, trade, industry and building services.

- b) in the context of balancing of interests (Article 6 (1) (f) GDPR)

If necessary, we process your data beyond the actual fulfillment of the contract for the protection of legitimate interests of us or third parties. For example, to consult and exchange information with credit bureaus, to assert legal claims and to defend legal disputes, to prevent or investigate criminal offenses, or to take action on the business management and development of services and products.

- c) on the basis of your consent (Article 6 (1) (a) GDPR)

Insofar as you give us consent to the processing of personal data for specific purposes, the lawfulness of this processing is based on your consent. A given consent can be revoked at any time. This also applies to the revocation of declarations of consent, which were given to us before the validity of the GDPR, ie before May 25, 2018. The revocation of consent is only effective for the future and does not affect the legality of the data processed until the revocation.

### **Who gets my data?**

Within NORDWEST Handel AG, those entities gain access to your data, which they need to fulfill the contractual obligations.

Furthermore, personal data may be used for the purpose of (examples of transfers).

Other data recipients may be those for whom you have given us your consent to the transfer of data or for whom we have the authority to transfer personal data due to a balance of interests.

### **Are data transmitted to a third country or to an international organization?**

In principle, there is no transfer of personal data to countries outside the European Union (so-called third countries), unless it is required by law (eg tax reporting obligations or you have given us consent.) If disclosure takes place, eg Switzerland or the USA are based on the data protection regulations according to Art. 44 et seq. DSGVO.

### **How long will my data be stored?**

We process and store your personal data as long as this is necessary to fulfill our contractual and legal obligations. If the data is no longer required for the fulfillment of the obligations, these are regularly deleted, unless their temporary processing is necessary for the following purposes:

- fulfillment of commercial and tax-related retention requirements, which may be B. can result from: Commercial Code (HGB), Tax Code (AO). The deadlines for storage and documentation specified there are usually two to ten years.
- Preservation of evidence under the statutory statute of limitations. According to §§195 ff. Of the Civil Code (BGB), these limitation periods can be up to 30 years, whereby the regular period of limitation is 3 years, calculated from the end of the year in which the business relationship ends.

### **Which data protection rights do I have?**

Each data subject has the right to information under Article 15 GDPR, the right to a correction under Article 16 GDPR, the right to cancellation under Article 17 GDPR, the right to restriction of processing under Article 18 GDPR, the right to object to Article 21 GDPR and the right to data portability under Article 20 GDPR. With the information right and with the cancellation right the restrictions after §§ 34 and 35 BDSG apply. In addition, there is a right of appeal to the competent data protection supervisory authority (Article 77 DSGVO i.V.m. § 19 BDSG).

You may revoke your consent to the processing of personal data at any time. This also applies to the revocation of declarations of consent, which were given to us before the validity of the GDPR, i.e before May 25, 2018. Please note that the revocation only works for the future. Processing that occurred before the revocation is not affected.

The competent supervisory authority is:

Landesbeauftragte für Datenschutz und Informationsfreiheit  
Nordrhein-Westfalen

Postfach 20 04 44  
40102 Düsseldorf  
Tel.: 0211/38424-0  
Fax: 0211/38424-10  
E-Mail:  
[poststelle@ldi.nrw.de](mailto:poststelle@ldi.nrw.de)

**Is there a duty for me to provide data?**

As part of our business relationship, you must provide the personal information that is required to initiate, conduct and terminate a business relationship and to perform the related contractual obligations or that we are required to collect by law. Without this data, we will generally be unable to conclude, execute or terminate a contract with you.

**To what extent is there an automated decision-making process?**

In principle, we do not use fully automated decision-making pursuant to Article 22 of the GDPR in order to establish and conduct business relationships. If we use these procedures in individual cases, we will inform you about this and about your related rights separately, if this is required by law.

**Is profiling taking place?**

Profiling, with the aim of evaluating certain personal aspects, does not take place through us.

**Information about your right to object under Article 21 GDPR**

**Case-specific right of objection**

You have the right at any time, for reasons arising from your particular situation, to prevent the processing of personal data concerning you pursuant to Article 6 (1) (e) of the GDPR (Data Processing in the Public Interest) and Article 6 (1) (f) GDPR (Data processing on the basis of a balance of interests) takes place, objecting; this also applies to a profiling based on this provision within the meaning of Article 4 No. 4 GDPR.

If you object, we will no longer process your personal information unless we can demonstrate compelling legitimate grounds for processing that outweigh your interests, rights and freedoms, or the processing is for the purpose of enforcing, pursuing or defending legal claims.

**Recipient of the opposition**

The objection can be addressed form-free with the subject "objection" stating your name, address and date of birth to:

NORDWEST Handel AG  
Robert-Schuman-Straße 17  
44263 Dortmund  
Tel.: +49 231 2222 3001  
E-Mail: [info@nordwest.com](mailto:info@nordwest.com)