



Passion for packaging

Information pursuant to Art. 13, 14 and Art. 21 of the General Data Protection Regulation (GDPR)

ROVEMA GmbH

Storage period of the personal data	3
Responsibilities	3
Contact details of the data protection officer	3
General information on the legal basis for data processing	3
Rights of the data subject	4
Processing when exercising your rights	4
Recipients of personal data outside the organisation	5
Transfer of data to a third country or international organisation	5
Adequacy decision of the EU Commission	5
Processing: CRM customer management	5
Purpose of the processing	5
Legal basis	5
Sources of the personal data	6
Categories of personal data	6
Legitimate interests	6
Storage duration	6
Processing: ERP merchandise management system	6
Purpose of the processing	6
Legal basis	7
Sources of personal data	7
Categories of personal data	7
Legitimate interests	7
Storage duration	7
Possible consequences of non-provision	8

18.03.2024 page 2/8

We would like to inform you about how we handle your personal data and what rights you are entitled to in accordance with the European General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (BDSG). Responsibility for data processing lies with the organisation ROVEMA GmbH (hereinafter referred to as "we" or "us").

Storage period of the personal data

We only store your data for as long as is necessary to achieve the purpose of the processing or to fulfil our contractual or legal obligations, unless otherwise stated in the following information. Statutory retention obligations may arise from commercial or tax law regulations. After the end of the calendar year in which we collected the data, we will retain personal data contained in our accounting records for ten years and personal data contained in business letters and contracts for six years.

Furthermore, we will retain data in connection with consents requiring proof as well as complaints and claims for the duration of the statutory limitation periods. Data stored for advertising purposes will be deleted if you object to processing for this purpose.

Responsibilities

We are responsible for the processing of your personal data:

ROVEMA GmbH
Christoph Gusenleitner, Dr Dirk Panhans

Industriestrasse 1 35463 Fernwald Germany

Phone: 0641/409323 E-mail: info@rovema.de

Contact details of the data protection officer

You can reach our data protection officer using the following contact details:

eMGe-DaTa Data protection with system Michaela Genderka

Blumenstrasse 13, 47918 Tönisvorst

E-mail: m.genderka@emge-data.de Phone:

02151 9422060

General information on the legal basis of data processing

"Personal data" is all information that relates to a specific person. We process this data in accordance with the applicable data protection laws, in particular the GDPR and the BDSG. We may only process personal data if we are legally authorised to do so.

18.03.2024 page 3/8

We only process personal data with your consent in order to enter into a contract with you or to respond to your enquiry in connection with a potential business relationship, to comply with legal obligations or to protect our legitimate interests, provided that this does not affect your interests or fundamental rights and freedoms that require the protection of personal data.

Rights of the data subject

The General Data Protection Regulation (GDPR) guarantees every data subject certain rights in relation to their personal data. These include:

- The right to information: Every data subject has the right to obtain confirmation from us as to whether or not
 personal data is being processed and to obtain information about this data as well as further information and
 copies of this data.
- The right to rectification: Every data subject has the right to demand the immediate rectification of inaccurate personal data.
- The right to erasure ("right to be forgotten"): Every data subject has the right to request the erasure of their personal data without undue delay.
- The right to restriction of processing: Every data subject has the right to request the restriction of the processing of their personal data.
- The right to data portability: Every data subject has the right to receive the personal data concerning them, which they have provided to us, in a structured, commonly used and machine-readable format.
- Right to object: Every data subject has the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1) GDPR. If we process personal data about the data subject for the purpose of direct marketing, the data subject may object to this processing in accordance with Art. 21 para. 2 and para. 3 GDPR.

The data subject also has the right to lodge a complaint with a supervisory authority if they believe that the processing of their personal data violates the GDPR.

The supervisory authority responsible for us is: The Hessian Data Protection Officer

Processing when exercising your rights

If you wish to exercise your rights in accordance with Articles 15 to 22 of the GDPR, we will process the personal data you have provided in order to implement these rights and to be able to provide proof of this. We will process the data stored for the purpose of providing information and preparation exclusively for this purpose and for data protection control purposes and otherwise restrict processing in accordance with Article 18 of the GDPR.

These processing operations are based on the legal basis of Article 6(1)(c) of the GDPR in conjunction with Articles 15 to 22 of the GDPR and Section 34(2) of the BDSG.

18.03.2024 page 4/8

Recipients of personal data outside the organisation

Article 4(9) of the General Data Protection Regulation (GDPR) defines the term "recipient" as "the natural or legal person, public authority, agency or any other body to whom personal data are disclosed, whether a third party or not".

- IT Vision Technology GmbH
- Avanade Deutschland GmbH

Arineo GmbH

Anton Software GmbH

Transfer of data to a third country or international organisation

A transfer of personal data to an "international organisation" (within the meaning of Art. 4 No. 26 GDPR) or to controllers, processors or other recipients in a country outside the European Union (EU) and the European Economic Area (EEA) poses particular data protection risks from the perspective of the data subject.

We transfer personal data to the following recipients outside the European Union (EU) and the European Economic Area (EEA):

• Data transfer to a third country or to an international organisation does not take place and is not planned.

Adequacy decision of the EU- Commission

A transfer of personal data to a country outside the European Union (EU) and the European Economic Area (EEA) or to an international organisation is permitted if the European Commission has determined that the country, territory or one or more specific sectors within that country or the international organisation in question ensures an adequate level of protection.

We transfer personal data to the following recipients outside the European Union (EU) and the European Economic Area (EEA) for which an adequacy decision exists:

 Data transfer to a third country or to an international organisation for which an adequacy decision by the EU Commission exists does not take place and is not planned.

Processing: CRM Customer management

Purpose of the processing

We process your personal data insofar as this is necessary to fulfil the following purposes:

 Comprehensive management of customers and prospects (customer acquisition and retention) as well as the associated quotation and order data

Legal basis

The legal basis for the processing of your personal data for the above-mentioned purposes is

18.03.2024 page 5/8

• Legitimate interest (Art. 6 para. 1 lit. f GDPR)

Sources of the personal data

If personal data is not collected directly from the data subject, the controller is obliged to inform the data subject about the sources of this data.

Voluntary self-disclosure

Contract data

Collected from the person concerned

Categories of personal data

If personal data is not collected directly from the data subject, the controller is obliged to inform the data subject of the categories of data concerned.

Inventory data

Contact data

Contract data

Customer history

Legitimate interests

The indication of the "legitimate interests" of the controller or the third party pursued with the processing of personal data refers to Art. 6 para. 1 sentence 1 lit. f GDPR.

Right to customer acquisition and retention

Storage duration

We will inform you of the duration for which the personal data will be stored or, if this is not possible, the criteria for determining this duration.

Deletion at the end of necessity (e.g. for ongoing customer relationships, legal proceedings, etc.)
 No deletion of contract, inventory and contact data: Right to erasure pursuant to Section 35 BDSG
 Para.1...

... If, in the case of non-automated data processing, erasure is not possible or only possible with disproportionate effort due to the special nature of the storage and the data subject's interest in erasure is considered to be low, the data subject's right and the controller's obligation to erase personal data pursuant to Article 17(1) of Regulation (EU) 2016/679 shall not apply in addition to the exceptions set out in Article 17(3) of Regulation (EU) 2016/679.

Processing: ERP Merchandise management system

Purpose of the processing

We process your personal data insofar as this is necessary to fulfil the following purposes:

18.03.2024 page 6/8

- Establishment, execution and termination of purchase agreements• Planning, management and control of the company
- Safety measures

Legal basis

The legal basis for the processing of your personal data for the above-mentioned purposes is/are

```
    Legal obligations (Art. 6 para. 1 lit. c GDPR)
    Legitimate interest (Art. 6 para. 1 lit. f GDPR)
```

Sources of the personal data

If personal data is not collected directly from the data subject, the controller is obliged to inform the data subject about the sources of this data.

- Contract data
- Authority data

Categories of personal data

If personal data is not collected directly from the data subject, the controller is obliged to inform the data subject about the categories of data concerned.

- Inventory dataContact data
- Contract data
- Authority data

Legitimate interests

The indication of the "legitimate interests" of the controller or the third party that are pursued with the processing of personal data refers to Art. 6 para. 1 sentence 1 lit. f GDPR.

• Right to customer acquisition and retention,

Storage duration

We will inform you of the duration for which the personal data will be stored or, if this is not possible, the criteria for determining this duration.

- Deletion at the end of necessity (e.g. for ongoing customer relationships, legal proceedings, etc.) No
- deletion of contract, inventory and contact data: According to § 35 BDSG right to erasure para.1...
 ... If, in the case of non-automated data processing, erasure is not possible or only possible with disproportionate effort due to the special nature of the storage and if the data subject's interest in erasure is considered to be low, the data subject's right to and the controller's obligation to erase personal data pursuant to Article 17(1) of Regulation (EU) 2016/679 shall not apply in addition to the exceptions set out in Article 17(3) of Regulation (EU) 2016/679.

18.03.2024 page 7/8

Possible consequences of not providing

The provision of personal data by the data subject may be required by law or contract or may be necessary for the conclusion of a contract. There may also be a legal obligation to provide the data.

Failure to provide personal data could have the following consequences:

• Shipping of products or services cannot be carried out

18.03.2024 page 8/8