

## DATA PROTECTION INFORMATION OF ZEPPELIN SYSTEMS GMBH

The EU General Data Protection Regulation (GDPR) contains comprehensive obligations to provide information regarding the use of personal data (hereinafter referred to as “data”). We would like to give you a summary of the kind of data Zeppelin Systems GmbH (hereinafter referred to as “ZSD”) collects and how the data are processed. This concerns data processing in the following situations:

- Data collection and processing when initiating and developing business contacts (III.)
- Data collection and processing when creating a quote and executing a contract (IV.)
- Data collection and processing when providing services (V.)
- Data used for advertizing purposes (VI.)
- Data exchange within the Zeppelin Group (VII.)

We will first start with some information required by law (I.) and inform you of your rights (II.)

### I. Who is the controller and how can I contact the data protection officer?

The controller with regard to the GDPR is **Zeppelin Systems GmbH, Graf-Zeppelin-Platz 1, 88045 Friedrichshafen (Germany)**. For questions about privacy policy, please contact our Group Data Protection Officer:

#### **Zeppelin GmbH**

Group Data Protection Officer

Graf-Zeppelin-Platz 1

85748 Garching bei München

Tel.: +49 89 32 000-0

Fax: +49 89 32 000-482

Email: [datenschutz@zeppelin.com](mailto:datenschutz@zeppelin.com)

The responsible supervisory authority is the State Commissioner for Data Protection and Freedom of Information for Baden-Württemberg, P.O. Box 10 29 32, 70025 Stuttgart, Germany. Please use the following address for contacting the supervisory authority by email: [poststelle@fdi.bwl.de](mailto:poststelle@fdi.bwl.de).

## II. Your data subject rights

All data subjects are entitled to the following rights:

- Right to access (Article 15 GDPR)
- Right to rectification of inaccurate data (Article 16 GDPR)
- Right to erasure or “the right to be forgotten” (Article 17 GDPR)
- Right to restrict processing of personal data (Article 18 GDPR)
- Right to data portability (Article 20 GDPR)

**You can at any time object to the processing of your personal data for advertizing purposes, including customer data analysis and disclosure to third parties for advertizing purposes.**

In addition to these rights, the data subject is also entitled to a general right to object (cf. Article 21 (1) GDPR), in which case the objection to data processing must be justified. If the legal basis for processing the data is consent then this can be revoked at any time and the revocation shall be effective for future processing.

To exercise any of these data subject rights, please contact [datenschutz@zeppelin.com](mailto:datenschutz@zeppelin.com) or the address below:

Zeppelin GmbH  
Group Data Protection Officer  
Graf-Zeppelin-Platz 1  
85748 Garching bei München  
Germany

To exercise your right to object to the processing of your personal data for email or telephone advertizing, please contact [ZSD-Widerruf@zeppelin.com](mailto:ZSD-Widerruf@zeppelin.com).

## III. Scope of data collection, intended purposes and data transfer – here: business contacts

In order to initiate business relationships, ZSD collects and processes personal data received from you during business contacts or made available by you when providing us information in an inquiry, a delivery or any business contact (i.e. data collected at events, trade fairs, ZSD presentations or at any other event or during networking). We also collect publicly accessible

data such as information on a company provided on the Internet or any other generally accessible lists (catalogs, association directories, etc.).

In addition to your contact details, data collection also comprises other information you provide us with in that regard (additional information on business cards - including wishes/requests – or on the company you work for).

ZSD's objective in processing these data is to support you and the company you work for in further developing our business relationship.

If your place of residence is not in Germany, ZSD will provide this data to the relevant subsidiary in your region or the responsible ZSD sales partner. We do this in order to promote further business development with you and our subsidiaries and sales partner as well, and to build a long-term relationship with you.

Insofar as the relevant ZSD sales partner processes your data in a state outside the European Union and outside the European Economic Area (so-called third countries) as well, establishing contractual relationships with the third country recipients are performed on the basis of standard data protection clauses adopted by the EU Commission (point (c) of Article 46 (2) GDPR). For a copy of these agreements, please use the contact details in this data protection statement.

We store personal data from other business contacts as long as this person is of business interest for us. These data are reviewed internally every 5 years. Afterwards, the data are archived if statutory storage obligation requires it, if not, they will be deleted.

Legal basis for processing personal data:

- from suppliers and other service providers in regard to business development pursuant to point (b) of Article 6 (1) GDPR
- from other business contacts including disclosure to subsidiaries / sales partners pursuant to point (f) of Article 6 (1) GDPR

**IV. Scope of data collection, intended purposes and data transfer – here: creating a quote and performing a contract**

**Creating a quote and performing a contract**

ZSD processes your contact details in order to create and transfer quotes (contract initiation), and processes the information given when placing an order to fulfill the contract and, where applicable, uses a specialized service provider (e.g. forwarder) to do so. Data processing for the performance of a contract covers the use of data to perform the contractually agreed service, including the settlement of any possible warranty claims.

Data collected by ZSD to perform the contract or to use services may also be shared with ZSD's external auditors and/or tax advisors for the purposes of consultation and auditing. ZSD stores the data in the operational system for as long as there are warranty claims. Subsequently, data that fall under the retention obligations stipulated in Sections 146 et seqq. of the German Fiscal Code (Abgabenordnung) and Section 257 of the German Commercial Code (Handelsgesetzbuch) shall be archived and erased when these obligatory retention periods expire. All other data shall be deleted immediately unless other intended purposes for the data are specified in this notice. Data regarding warranty claims are processed in accordance with point (b) of Article 6 (1) GDPR, including compliance with legal obligations (point (c) of Article 6 (1) GDPR).

In order to combat terrorism, EU Regulations (EC) 2580/2001 and (EC) 881/2002 demand that none of our clients be affiliated with terror suspects as registered on the centrally managed lists (terror lists). We are therefore required to regularly synchronize our data with the terror list before conclusion of the business deal. The legal basis for processing data in this way is point (c) of Article 6 (1) GDPR (compliance with a legal obligation) as well as point (f) of Article 6 (1) (legitimate interest) GDPR where there is no legal obligation. Our legitimate interest in this instance is minimizing risk and avoiding financial penalties for infringement of the law.

#### **Address verification and creditworthiness**

For verification of address and creditworthiness, ZSD retrieves your company's address and credit information which are saved by credit agencies in data banks. This includes data that are calculated using mathematical and statistical processes (scoring). This occurs if ZSD assumes economic risk when the contract is concluded and wishes to establish safeguards by carrying out credit checks.

The following credit agencies provide ZSD with addresses and credit information:

- Creditreform Ulm/Neu-Ulm, Müller & Schott GmbH & Co. KG, Ravensburg branch office, Karlstraße 10, 88212 Ravensburg (Germany)
- Bisnode D&B Deutschland GmbH, Robert-Bosch-Straße 11, 64293 Darmstadt (Germany)
- Euler Hermes Deutschland, subsidiary of Euler Hermes SA, Friedensallee 254, 22763 Hamburg (Germany)

These data are processed in accordance with point (f) of Article 6 (1) GDPR to safeguard from economic risks incurring when concluding a contract by carrying out credit checks.

Your credit information shall be erased five years after you last placed an order or used services. No automated individual decision-making, as described in Article 22 GDPR, is performed.

#### **V. Scope of data collection, intended purposes and data transfer – here: services**

The following data protection notices contain information on personal data processing by ZSD. These data are retrieved while performing services, particularly when a service agreement has been made.

Data collected through maintenance work and services are used for invoicing purposes and, in some cases, are subject to a statutory storage period of up to 10 years. The data will only be deleted once the statutory storage period has expired. Subsequent data storage and use for future diagnosis requests is based on the legitimate interest in obtaining the most accurate recommendations possible after a diagnosis and therefore in improving the quality of repair work (point (f) of Article 6 (1) GDPR). These data may also be shared with ZSD's external auditors and/or tax advisors for the purposes of consultation and auditing. Data collected to perform the contract are stored by ZSD in the operational system for as long as there are warranty claims.

We collect data for the verification, approval and handling of queries in regard to goodwill, guarantee and warranty. These data are handled internally by ZSD when processing service requests by customers.

The relevant data will be deleted after the goodwill, guarantee and warranty claims have been closed. This data processing is based on point (f) of Article 6 (1) GDPR.

Data collected through the processing of queries in regard to goodwill as well as guarantee and warranty claims are, in some cases, subject to a statutory storage period of up to 10 years. The data will only be deleted once the statutory storage period has expired. Subsequent data storage and use for future goodwill, guarantee and warranty inquiries is based on the legitimate interest in obtaining the most accurate recommendations possible after a diagnosis and therefore in improving the quality of repair work (point (f) of Article 6 (1) GDPR).

## **VI. Use of data by Zeppelin Systems GmbH for marketing purposes**

ZSD and the relevant commissioned service providers (lettershops, etc.) use name and address details to provide more information about products and services from the Zeppelin Group.

ZSD wishes to support its customers in their business development and therefore processes data collected during the business relationship (contact details, products purchased, services ordered, etc.) to better advise its customers on products that are most suitable for their company's development. We, and commissioned service providers if necessary, may also analyze these data for marketing purposes, including scoring. Further data may be added to this analysis on the basis of your consent.

ZSD also uses your phone number for marketing purposes provided that you have consented or there is evidence of implied consent, e.g. as part of an existing business relationship. In addition, ZSD uses email addresses collected when concluding the contract for promoting similar ZSD products. The right to object to marketing is mentioned when collecting data and in every instance of contact for the purpose of advertizing. Your email address will only be used for similar offers with purposes that differ from their original intend once you have consented to it.

To achieve the marketing objectives, the data shall be used over a period of five years from the time the last order was placed or service was used. The data shall be erased at the end of this five-year period, unless there is consent for extended use of the data and/or specific data are subject to statutory storage periods. In the latter case, the data shall be erased when the statutory storage period expires. Data processing for marketing purposes is performed in accordance with point (f) of Article 6 (1) GDPR, unless you have explicitly consented to a specific form of marketing material, in which case data processing is

performed on the basis of point (a) of Article 6 (1) GDPR. By sending you these marketing materials, we aim to keep you updated about our products and services into the future and in this way establish a long-lasting business relationship with you.

## **VII. Sharing data within the Zeppelin Group**

ZSD shares the master data (company name, contact person, address and contact details such as telephone number and email address) to other Zeppelin Group companies so that the data can be managed and used consistently across the Group companies. This also includes sharing updates to this data, of which we or another Group company become aware. These updates shall also be made available to other Group companies. This helps simplify our processes and means you do not need to resubmit master data when contacting a different Group company.

A summary of the Group companies is available at

[https://www.zeppelin.com/content/dam/zeppelin/anlagenbau/dokumente-für-qr-](https://www.zeppelin.com/content/dam/zeppelin/anlagenbau/dokumente-für-qr-code/Datenschutz_Konzernunternehmen_en.pdf)

[code/Datenschutz\\_Konzernunternehmen\\_en.pdf](https://www.zeppelin.com/content/dam/zeppelin/anlagenbau/dokumente-für-qr-code/Datenschutz_Konzernunternehmen_en.pdf). These data shall be erased five years after you last place an order or use services, unless specific data are still subject to obligations for continued retention in accordance with Sections 146 et seqq. of the German Fiscal Code and/or Section 257 of the German Commercial Code. In this case, the data shall be deleted when the obligatory storage periods expire. These data are processed in accordance with point (f) of Article 6 (1) GDPR.

Some Zeppelin Group companies process your data also in states outside the European Union (“EU”) and outside the European Economic Area (“EEA”).

To protect your personal rights when transferring your data we ensure that the contracts with relevant recipients in third party countries comply with the EU Commissions standard clauses according to point (c) of Article 46 (2) GDPR. To inquire about these documents please use the contact details provided in this data protection statement.

This data protection notice may be updated occasionally. You will find the latest version of this privacy notice here: <https://www.zeppelin-systems.com/privacy-policy.html>. If there is a new intended purpose for data that have already been collected, we shall inform you without being prompted to do so.

As of: 29 May 2019