

Data protection Policy Wilo Nordic

With the following information, we would like to give you an overview of the processing of your personal data by WILO Nordic and your rights under data protection law. Which data is processed in detail and how it is used depends on the concluded contractual relationship or other agreed services.

Responsible body

Responsible body is:

WILO Nordic
Isbjörnsvägen 6
352 45 Växjö
Telefon: +46 470-727 626
E-Mail-Address: data-privacy.nordic@wilo.com

Use of the data

We process personal data that we receive from our customers, suppliers or other third parties as part of our business relationship. In addition, as far as required for the provision of our services, we process personal data that we legitimately gain from publicly available sources (such as the Internet) or that are submitted to us by other companies of the Wilo Group or other third parties.

Relevant personal data are personal details (name, address and other contact details of contact persons of customers, suppliers or other third parties). In addition, this may also include order data (eg. orders or payment information), data from the fulfillment of our contractual obligations (eg year of birth), information about your financial situation (eg credit checks), advertising and sales data (including advertising scores), documentation data (eg consulting protocols) and other data comparable to the above categories.

Purpose of processing

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

Fulfillment of contractual obligations (Article 6 (1) (b) GDPR)

The processing of data takes place in order to provide our commercial transactions and services as part of the execution of our contracts with our customers, suppliers or other third parties or to carry out pre-contractual measures, which are carried out on request. The purposes of processing are primarily directed to the specific product (e.g., merchandising, consulting, and services) and may include, but is not limited to, needs analysis, consulting, and transaction execution. Further details on the data processing purposes can be found in the relevant contract documents and terms and conditions.

In the context of weighing interests (Article 6 (1) f DSGVO)

If necessary, we process your data beyond the actual fulfillment of the contract for the protection of legitimate interests of us or third parties:

- Review and optimization of requirements analysis procedures for direct customer approach,
- Advertising or market and opinion research, as long as you have not objected to the use of your data,
- Measures for the business control and further development of services and products,
- Consultation and data exchange with credit bureaus to identify credit and default risks,
- Risk management in the Wilo Group,
- asserting legal claims and defense in legal disputes,
- ensuring the IT security and IT operations of the company,
- video surveillance to safeguard the rights of the house and to collect evidence in the event of burglary or theft, as well as further measures to ensure the rights of the home,
- Measures for building and plant safety (eg access control),
- Prevention and investigation of criminal offenses,

On the basis of your consent (Article 6 (1) a DSGVO)

Insofar as you have given us consent to the processing of personal data for specific purposes (eg sending out newsletters, evaluating purchasing behavior for marketing purposes), the legality of this processing is based on your consent. A given consent can be revoked at any time for the future. This also applies to the revocation of declarations of consent, which were issued to us before the validity of the GDPR, ie before May 25, 2018. The revocation of consent does not affect the legality of the data processed until the revocation.

Due to legal requirements (Article 6 (1) c DSGVO) or in the public interest (Article 6 (1) (e) GDPR)

In addition, as an international company we are subject to various legal obligations, ie legal requirements (eg tax laws, money laundering laws). Processing purposes include, but are not limited to, credit check, identity verification, fraud and money laundering prevention, as well as the evaluation and management of risks within the Group.

Recipient of the data

Within our organization, those entities gain access to your data, which they need to fulfill our contractual and legal obligations. Our service providers and vicarious agents may also receive data for these purposes. These are companies in the categories IT Services, Logistics, Printing Services, Telecommunications, Debt Collection, Consulting and Consulting as well as Sales and Marketing.

With regard to the data transfer to recipients outside of our company, it should first be noted that all our employees who work with personal data are committed to data secrecy and confidentiality.

Information about you, we may only pass on, if required by law or you have consented. Under these conditions, recipients of personal data may, for. For example:

- Public bodies and institutions (eg tax authorities, law enforcement agencies) in the presence of a legal or regulatory obligation.
- Other companies to whom we provide personal information for the purpose of conducting the business relationship (depending on the contract, eg catalog shipping, credit bureaus, etc.).
- Other companies in the Group for risk management due to statutory or regulatory obligation.

Other data recipients may be the ones for whom you have given us your consent to submit the data.

Transmission of the data to a third country or to an international organization

A transfer of data to offices in countries outside the European Union (so-called third countries) takes place, as far as

- it is necessary to execute your orders (eg production orders),
- it is required by law (eg tax reporting obligations) or
- You have given us your consent.

In addition, Wilo does not submit any personal data to third-country or international organizations. However, Wilo uses service providers for certain tasks, most of whom also use service providers who can have their company headquarters, parent company or data center in a third country. A transfer is permitted if the European Commission has decided that an adequate level of protection exists in a third country (Article 45 GDPR). If the Commission has not made such a decision, Wilo or the service provider may only transfer personal data to a third country or to an international organization, provided that appropriate safeguards are provided (eg standard data protection clauses adopted by the Commission or the supervisory authority in a specific procedure) and enforceable rights and effective remedies. Wilo has contractually agreed with these service providers that, with their contractual partners, the fundamentals of data protection are always complied with while adhering to the European data protection level.

Storage duration of the data

We process and store your personal information as long as it is necessary for the fulfillment of our contractual and legal obligations. If the data are no longer required for the fulfillment of

contractual or legal obligations, they are deleted on a regular basis, unless their temporary processing is necessary for the following purposes:

- Fulfillment of commercial and tax retention requirements. The deadlines for storage and documentation specified there are six to ten years.
- Preservation of evidence within the statutory limitation period. These limitation periods can be up to 30 years, whereby the regular limitation period is up to three years.

Privacy Rights

Each data subject has the right to information under Article 15 of the GDPR, the right of 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 under Article 21 GDPR and the right to data portability under Article 20 GDPR. With regard to the right to information and the right to erase, the restrictions under §§ 34 and 35 BDSG apply. In addition, there is a right of appeal to a competent data protection supervisory authority (Article 77 DSGVO in conjunction with Section 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 that were given to us prior to the validity of the General Data Protection Regulation, ie before 25 May 2018. Please note that the revocation only works for the future. Processing that occurred before the revocation is not affected.

Withdrawal rights

Case-specific right of objection:

You have the right at any time, for reasons arising out of 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 establish compelling legitimate grounds for processing that outweigh your interests, rights and freedoms, or the processing is for the purposes of asserting, exercising or defending legal claims.

Right to object to the processing of data for direct marketing purposes:

In individual cases, we process your personal data in order to operate direct mail. You have the right to object at any time to the processing of personal data concerning you for the purposes of such advertising;

This also applies to profiling insofar as it is associated with such direct mail.

If you object to the processing for direct marketing purposes, we will no longer process your personal data for these purposes. The objection can be free of form and should be directed as far as possible to:

WILO Nordic
"Data Protection"
Box 3024
350 33 Växjö

Provision of data

As part of our business relationship, you must provide the personal information necessary to enter into a business relationship and perform its contractual obligations, or that we are required to collect by law. Without this information, we may not be able to conclude or execute the contract with you in some cases.

Profiling

We sometimes process your data automatically with the aim of evaluating certain personal aspects (profiling). For example, we use profiling to provide you with targeted information and advice on products. We use evaluation tools on our web pages. These enable needs-based communication and advertising, including market and opinion research.

Automated decision-making

In principle, we do not use fully automated decision-making in accordance with Art. 22 DSGVO to justify and implement the business relationship. If we use these procedures in individual cases, we will inform you about this separately, if this is required by law.

Children

Children should not submit any personal information to Wilo without the consent of the parent or guardian. Wilo encourages all parents and guardians to instruct their children in the safe and responsible use of personal information, especially on the Internet. In any event, Wilo will not knowingly collect, use, or otherwise disclose personally identifiable information about children in any way.

As of May 2018

Please note that this statement may be supplemented or amended in the future due to legal or other requirements. Please inform yourself regularly about the current status.