

## Data protection policy of Syntegon Technology GmbH

### 1. Data Protection Notice

Syntegon Technology GmbH (hereinafter Syntegon or “We” or “Us”) welcomes you to our internet pages and mobile applications (together also referred to as “Online Offers”). We thank you for your interest in our company and our products.

### 2. Syntegon respects your privacy

The protection of your privacy throughout the course of processing personal data as well as the security of all business data is an important concern to us. We process personal data that was gathered during your visit of our Online Offers confidentially and only in accordance with statutory regulations. Data protection and information security are included in our corporate policy.

### 3. Controller

Syntegon is the controller responsible for the processing of your data; exceptions are outlined in this data protection notice.

Our contact details are as follows:

Syntegon Technology GmbH  
Formerly Bosch Packaging Technology  
Stuttgarter Straße 130  
71332 Waiblingen  
Deutschland

E-Mail: [info@syntegon.com](mailto:info@syntegon.com),  
Tel: +49 71 51 14-0

### 4. Collection, processing and usage of personal data

#### 4.1 Processed categories of data

The following categories of data are processed:

- Communication data: (e.g. company name, first name, name, telephone, e-mail, address, IP address)
- Contractual master data: (e.g. Offer & Name, Order & Name, Memo & Name)
- Client history: (e.g. Login Date & Name)

#### 4.2 Principles

Personal data consists of all information related to an identified or identifiable natural person, this includes, e.g. names, addresses, phone numbers, email addresses, contractual master data, contract accounting and payment data, which is an expression of a person's identity.

We collect, process and use personal data (including IP addresses) only when there is either a statutory legal basis to do so or if you have given your consent to the processing or use of personal data concerning this matter, e.g. by means of registration.

#### 4.3 Processing purposes and legal bases

We - as well as the service providers commissioned by us - process your personal data for the following processing purposes:

##### 4.3.1 Provision of these Online Offers

(Legal bases: Fulfillment of contractual obligation).

##### 4.3.2 Resolving service disruptions as well as for security reasons.

(Legal bases: Fulfillment of our legal obligations within the scope of data security and justified interest in resolving service disruptions as well as in the protection of our offers).

##### 4.3.3 Product or customer surveys by postal mail

(Legal basis: Justified interest in the improvement of products / services).

Note: In case we involve a market research institute for the purpose of surveys, it shall only act based on our instructions and follow our directives.

##### 4.3.4 Product or customer surveys performed via email and/or telephone subject to your prior express consent.

(Legal basis: Consent).

Note: In case we involve a market research institute for the purpose of surveys, it shall only act based on our instructions and follow our directives.

##### 4.3.5 Sending an email or SMS/MMS newsletter subject to the recipient's consent

(Legal basis: Consent).

##### 4.3.6 Safeguarding and defending our rights.

(Legal basis: Justified interest on our part for safeguarding and defending our rights).

#### 4.4 Registration

If you wish to use or get access to benefits requiring to enter into the fulfillment of a contract, we request your registration. With your registration we collect personal data necessary for entering into the fulfillment of the contract (e.g. first name, last name, email address, if applicable, details on the preferred payment method or on the account holder) as well as further data on voluntary basis, if applicable. Mandatory information is marked with an \*.

#### 4.5 Log files

Each time you use the internet, your browser is transmitting certain information which we store in so-called log files. We store log files to determine service disruptions and for security reasons (e.g., to investigate attack attempts) for a period of [30-60 days] and delete them afterwards. Log files which need to be maintained for evidence purposes are excluded from deletion until the respective incident is resolved and may, on a case-by-case basis, be passed on to investigating authorities.

Log files are also used for analysis purposes (without the IP address or without the complete IP address) see module “Advertisements and/or market research (including web analysis, no customer surveys)”.

In log files, in particular the following information is saved:

- IP address (internet protocol address) of the terminal device which is being used to access the Online Offer;
- Internet address of the website from which the Online Offer is accessed (so-called URL of origin or referrer URL);
- Name of the service provider which was used to access the Online Offer
- Name of the files or information accessed;
- Date and time as well as duration of recalling the data;
- Amount of data transferred;
- Operating system and information on the internet browser used, including add-ons installed (e.g. Flash Player);
- http-status code (e.g., “Request successful” or “File requested not found”).

#### 4.6 Children

This Online Offer is not meant for children under 16 years of age.

#### 4.7 Data transfer to other controllers

Principally, your personal data is forwarded to other controllers only if required for the fulfillment of a contractual obligation, or if we ourselves, or a third party, have a legitimate interest in the data transfer, or if you have given your consent. Particulars on the legal basis and the recipients or categories of recipients can be found in the Section – Processing purposes and legal basis.

Additionally, data may be transferred to other controllers when we are obliged to do so due to statutory regulations or enforceable administrative or judicial orders.

#### 4.8 Service providers (general)

We involve external service providers with tasks such as sales and marketing services, contract management, payment handling, programming, data hosting and hotline services. We have chosen those service providers carefully and monitor them on a regular basis, especially regarding their diligent handling of and protection of the data that they store. All service providers are obliged to maintain confidentiality and to comply to the statutory provisions.

#### 4.9 Transfer to recipients outside the EEA

We might transfer personal data to recipients located outside the EEA into so-called third countries. In such cases, prior to the transfer we ensure that either the data recipient provides an appropriate level of data protection or that you have consented to the transfer. You are entitled to receive an overview of third country recipients and a copy of the specifically agreed-provisions securing an appropriate level of data protection. For this purpose, please use the statements made in the contact section.

#### 4.10 Duration of storage; retention periods

Principally, we store your data for as long as it is necessary to render our Online Offers and connected services or for as long as we have a legitimate interest in storing the data (e.g. we might still have a legitimate interest in postal mail marketing after fulfillment of our contractual obligations). In all other cases we delete your personal data with the exception of data we are obliged to store for the fulfillment of legal obligations (e.g. due to retention periods under the tax and commercial codes we are obliged to have documents such as contracts and invoices available for a certain period of time).

### 5. Cookie usage

In the context of our online service, cookies and tracking mechanisms may be used. Cookies are small text files that may be stored on your device when visiting our online service. Tracking is possible using different technologies. In particular, we process information using pixel technology and/or during log file analysis.

#### 5.1 Categories

We distinguish between cookies that are mandatorily required for the technical functions of the online service and such cookies and tracking mechanisms that are not mandatorily required for the technical function of the online service. It is generally possible to use the online service without any cookies that serve non-technical purposes.

##### 5.1.1 Technically required cookies

By technically required cookies we mean cookies without those the technical provision of the online service cannot be ensured. These include e.g. cookies

that store data to ensure smooth reproduction of video or audio footage. Such cookies will be deleted when you leave the website.

#### 5.1.2 Cookies and tracking mechanisms that are technically not required

We do not use such cookies and tracking mechanisms.

#### 5.2.1 Management of Cookies and tracking mechanisms

You can manage your cookie and tracking mechanism settings in the browser and/or our privacy settings.

Note: The settings you have made refer only to the browser used in each case.

#### 5.2.2 Deactivation of all cookies

If you wish to deactivate all cookies, please deactivate cookies in your browser settings. Please note

that this may affect the functionality of the website.

### 6. Newsletter

Within the scope of our Online Offers you can sign up for newsletters. We provide the so-called double opt-in option which means that we will only send you a newsletter via email, mobile messenger (such as, e.g. WhatsApp), SMS or push notification after you have explicitly confirmed the activation of the newsletter service to us by clicking on the link in a notification.

In case you wish to no longer receive newsletters, you can terminate the subscription at any time by withdrawing your consent. You can withdraw your consent to email newsletters by clicking on the link which is sent in the respective newsletter mail, or in the administrative settings of the online offer. Alternatively, please contact us via the contact details provided in the Contact section.

### 7. External links

Our Online Offers may contain links to third party internet pages – by providers who are not related to us. Upon clicking on the link, we have no influence on the collecting, processing and use of personal data possibly transmitted by clicking on the link to the third party (such as the IP address or the URL of the site on which the link is located) as the conduct of third parties is naturally beyond our supervision. We do not assume responsibility for the processing of personal data by third parties.

### 8. Security

Our employees and the companies providing services on our behalf, are obliged to confidentiality and to compliance with the applicable data protection laws.

We take all necessary technical and organizational measures to ensure an appropriate level of security and to protect your data that are administrated by

us especially from the risks of unintended or unlawful destruction, manipulation, loss, change or unauthorized disclosure or unauthorized access. Our security measures are, pursuant to technological progress, constantly being improved.

## 9. User rights

To enforce your rights, please use the details provided in the Contact section. In doing so, please ensure that an unambiguous identification of your person is possible.

### *Right to information and access:*

You have the right to obtain confirmation from us about whether or not your personal data is being processed, and, if this is the case, access to your personal data.

### *Right to correction and deletion:*

You have the right to obtain the rectification or completion of inaccurate personal data or deletion of your data as far as statutory requirements are fulfilled.

This does not apply to data which is necessary for billing or accounting purposes or which is subject to a statutory retention period. If access to such data is not required, however, its processing is restricted (see the following).

### *Restriction of processing:*

You have the right to demand for – as far as statutory requirements are fulfilled – restriction of the processing of your data.

### *Data portability:*

You are entitled to receive data that you have provided to us in a structured, commonly used and machine-readable format or – if technically feasible – to demand that we transfer those data to a third party.

### *Objection to direct marketing:*

Additionally, you may object to the processing of your personal data for direct marketing purposes at any time. Please take into account that due to organizational reasons, there might be an overlap between your objection and the usage of your data within the scope of a campaign which is already running.

### *Objection to data processing based on the legal basis of “legitimate interest”:*

In addition, you have the right to object to the processing of your personal data at any time, insofar as this is based on legitimate interest. We will then terminate the processing of your data, unless we demonstrate compelling legitimate grounds according to legal requirements which override your rights.

*Withdrawal of consent:*

In case you consented to the processing of your data, you have the right to revoke this consent at Any time with effect for the future. The lawfulness of data processing prior to your withdrawal remains unchanged demonstrate compelling legitimate grounds according to legal requirements which override your rights.

**9.1 Right to lodge complaint with supervisory author:**

You have the right to lodge a complaint with a supervisory authority. You can appeal to the supervisory authority which is responsible for your place of residence or your state of residency or to the supervisory authority responsible for us. This is:

State Commissioner for Data Protection and Freedom of Information

Address:

Königstrasse 10a,  
70173 Stuttgart, GERMANY

Postal address:

P.O. Box 10 29 32,  
70025 Stuttgart, GERMANY

Phone: +49 711 / 615541-0

Fax: +49 711 / 615541-15

Email: [poststelle@fdi.bwl.de](mailto:poststelle@fdi.bwl.de)

**10. Changes to the Data Protection Notice**

We reserve the right to change our security and data protection measures if this is required due to technical development. In such cases, we will amend our data protection notice accordingly. Please, therefore, notice the current version of our data protection notice, as this is subject to change.

**11. Contact**

If you wish to contact us, please find us at the address stated in the "Controller" section. To assert your rights and to notify data protection incidents please use the following link:

<https://www.bkms-system.net/syntegon>.

For suggestions and complaints regarding the processing of your personal data we recommend that you contact our data protection officer:

Data Protection Officer  
Information Security and Privacy (PA/DSO)  
Syntegon Technology GmbH  
Postfach 11 27  
71301 Waiblingen  
Germany

or

E-Mail: [dpo@syntegon.com](mailto:dpo@syntegon.com)

## 12. Data

Effective date: 2020.01.22