

# Privacy policy pursuant to Art. 13 GDPR

## Processing of customer data or third parties involved in the transaction

We take the protection of personal data seriously and observe data protection regulations, in particular the EU General Data Protection Regulation ("GDPR") and the Data Protection Act ("DSG").

In this privacy policy, we will explain what information (including personal information) we process about you in connection with the relationship we have with you.

### Who is responsible for data processing?

(1) The entity responsible for processing personal data is:

SUNPOR Kunststoff GmbH  
Tiroler Straße 14  
3105 St. Pölten  
Telephone: +43 (0) 2742 291 - 0  
E-Mail: [office@sunpor.at](mailto:office@sunpor.at)

With regard to data protection, you can always contact the following address: [sun.dsgvo@sunpor.at](mailto:sun.dsgvo@sunpor.at)

### Which data do we process?

The execution of our business relations requires the processing of data of our contractual partners. Insofar as these data permit conclusions to be drawn about a natural person (for example, if you enter into a business relationship with us as an individual merchant), these are personal data. Regardless of the legal form of our contractual partner, we also process data on the contact persons at our contractual partner.

Please also provide this privacy policy to those individuals within your organisation who are involved in the relationship with us ("contact person").

### The following data is processed by us:

- > Order number
- > Name or designation
- > Title/gender
- > Address
- > Telephone and fax numbers and other information required for addressing, resulting from modern communication techniques
- > Birthday, month and year (as far as necessary for identification)
- > Company register data
- > Credit rating information
- > Block indicator (e.g. contact block, billing block, delivery block, booking block, payment block)

- > Assignment to a specific customer and supplier category (including regional assignment, etc.)
- > Identification numbers for purposes of official statistics such as a VAT number and Intrastat identification number
- > Belonging to a certain purchasing association, group
- > Correspondence languages, other agreements and keys for data exchange
- > Subject of the delivery or service
- > Bonus, commission data and the like.
- > Contact person for the person concerned to process the delivery or service
- > Third parties involved in the provision of services, including information on the type of participation
- > Delivery and service conditions (including details of the place of delivery or service, packaging, etc.)
- > Data on customs clearance (e.g. country of origin, tariff number) and export control
- > Data to insure the delivery or service and to finance it
- > Data on tax liability and tax calculation
- > Financing and payment terms
- > Bank details
- > Data on credit management (e.g. credit limit, bill of exchange limit)
- > Data on the payment or performance of the person concerned
- > Data on reminders/actions
- > Account and receipt data
- > Performance-specific expenses and income
- > Special general ledger transactions (for example, individual valuation adjustment, bill of exchange receivable, prepayment, bank guarantee)
- > Marketing data (industry name, correspondence language, support data such as visits or sent advertising material, response behaviour as well as bonus and benefit data)

In case of contact persons, company affiliation as well as salutation/gender are also collected.

If your data is a pure delivery or billing address, then the data is limited to the following content:

- > Name or designation
- > Title/gender
- > Address Telephone and fax numbers and other information required for addressing, resulting from modern communication techniques

- Correspondence languages, other agreements and keys for data exchange
- Information on special conditions for acceptance of delivery or service

### For what purposes and on which legal basis do we process personal data?

Processing takes place to carry out the contracts existing with our contractual partner or to carry out pre-contractual measures on the basis of Article 6 para. 1 (b) GDPR. Regardless of the legal form of our contractual partner, we process the data relating to one or more contact persons in order to safeguard our legitimate interest in carrying out the business relationship on the basis of Article 6 para. 1 (f) GDPR.

We may also process data to fulfil legal obligations to which we are subject; this is done on the basis of Article 6 para. 1 (c) GDPR. These legal obligations include, in particular, the notifications required of us by (tax) authorities.

As far as necessary, we also process data beyond the execution of the concluded contracts and the fulfilment of legal obligations for the protection of our legitimate interests or the interests of third parties; this is done on the basis of Article 6 para. 1 (f) GDPR. Our justified interests include

- the identification of economic risks – such as payment defaults – in connection with our business relationships;
- the assertion of legal claims and defence in the event of legal disputes;
- the prevention and investigation of criminal offences;
- the management and development of our business activities including risk management as well as direct advertising for our products.

### Is there an obligation to provide personal information?

The provision of the above data is required for the establishment and implementation of the business relationship with our contractual partners, unless expressly stated otherwise by us when collecting this data. Without the provision of this data, we cannot establish and conduct a business relationship. If we collect any additional personal information, we will state whether the provision of said information is required by law or contract or is required to enter into a contract.

### Who receives personal data?

Personal data is generally processed within our company.

Depending on the type of personal data, only certain departments/persons have access to personal data. In addition to the technically responsible employees, this also includes to a certain extent IT employees for data processed via the IT infrastructure.

A role and authorisation concept limits access within our organisation to those functions and to the extent required for the particular purpose of the processing.

We may also transfer personal information to third parties outside our company to the extent permitted by law. In particular, these external recipients may include

- the service providers engaged by us that provide services to us on a separate contractual basis, which may include the processing of personal data, as well as the subcontractors of our service providers (such as parcel services) engaged with our consent, as well as
- non-public and public entities, to the extent that we are required by law to transmit your personal information.

### Is automated decision making used?

In principle, or in the course of the business relationship, we generally do not use automated decision-making (including profiling) within the meaning of Article 22 GDPR. If we use such procedures in individual cases, we will inform affected persons about this to the extent required by law.

### Is data transmitted to countries outside the EU/EEA?

The processing of personal data takes place exclusively within the EU or the European Economic Area; a transfer to other countries (so-called “third countries”) is not planned.

### How long will personal data be stored?

In principle, we store personal data as long as we have a legitimate interest in this storage and do not outweigh the interests of the person concerned in not continuing storage.

Even without a legitimate interest, we can continue to store the data if we are legally obliged to do so (for example, to fulfil retention obligations). We delete personal data even without the intervention of the data subject as soon as their knowledge is no longer necessary to fulfil the purpose of the processing or storage is otherwise legally inadmissible.

As a rule, the data is stored at least until the end of the business relationship. Data is deleted at the latest at the time of its purpose being achieved. This may also occur after termination of the business relationship.

The personal data that we need to store in order to fulfil our retention obligations will be stored until the end of the respective retention obligation. Insofar as we store personal data solely for the purpose of fulfilling retention requirements, these are generally blocked so that they can only be accessed if this is necessary in view of the purpose of the retention obligation.

### What rights does an affected person have?

An affected person has the right

- > to information on the personal data stored about them, Article 15 GDPR;
- > to correction of incorrect or incomplete data, Article 16 GDPR;
- > to deletion of personal data, Article 17 GDPR;
- > to limit processing, Article 18 GDPR;
- > to data transferability, Article 20 GDPR, and
- > to object to the processing of your personal data, Article 21 GDPR.

In order to exercise these rights, an affected person may contact us at any time, for example via one of the contact channels indicated at the beginning of this privacy policy.

An affected person is also entitled to file a complaint with a competent supervisory authority for data protection, Article 77 GDPR:

**Austrian Data Protection Authority**  
**Wickenburggasse 8**  
**1080 Vienna**  
**Telephone: +43 (0) 1 52 152 - 0**  
**Email: [dsb@dsb.gv.at](mailto:dsb@dsb.gv.at)**