

Data Privacy Notice

Thank you for your interest in our companies and our services. **Like others we** process your data in order to fulfil our missions. We ask for your understanding.

This privacy notice explains the nature, scope and purpose of the processing of personal data (hereinafter referred to as "data") within our group of companies.

With regard to the terminology used, such as "personal data" or their "processing" we refer to the definitions in Art. 4 of the General Data Protection Regulation (GDPR of the European Union.
<https://gdpr-info.eu/art-4-gdpr/>

Legal Basis

As far as we process personal data of individual residents of the EU or the controlling company is based in the EU, the General Data Protection Regulation (GDPR) of the EU shall apply.

Otherwise we process personal data based on Swiss Law. This document shall apply in analogy except of the cited paragraphs of the GDPR. In these cases mandatory rules of Swiss law shall precede any conflicting statements of this document.

Controllers:

ProdEq Trading GmbH, Reckholder 1, 9527 Niederhelfenschwil, Switzerland

General Manager: Dr. Frank Goedicke

info@prodeq.ch

ProdEq (Schweiz) GmbH, Reckholder 1, 9527 Niederhelfenschwil, Switzerland

General Manager: Dr. Frank Goedicke

info@prodeq.ch

ProdEq Deutschland GmbH, Weberweg 2, 42499 Hückeswagen, Germany

General Manager: Thomas Berger

thomas.berger@prodeq.de

ProdEq d.o.o., Opekarniska 4, 2327 Race, Slovenia

General Manager: Matjaz Gradisnik

info@prodeq.si

Post-Venta Carreras S.A., C/ Nicolau Copèrnic 2, 08787 La Pobla de Claramunt, Spain

General Manager: Alex Carreras

sales@prensas.net

ProdEq Services GmbH, Wilhelm-Maybach-Str. 6, 78234 Engen, Germany

General Manager: Stephanie Leu

logistics@prodeq.com

We process data in a way that allows to identify the responsible controller for each record.

Type of data processed by information systems:

- contact data (e.g., names, addresses, e-mail addresses, phone numbers...)
- communications (e.g. e-mails, scanned correspondence, offers, search queries, protocols of verbal communication)
- data on products in the context of business communication (specifications, photos, videos)
- contract data (e.g., contracts, objects of contract, contract terms)
- payment data, fiscal data (e.g., bank accounts, payment history, VAT UID, EORI no.)
- marketing data (e.g., profiles consisting of keywords / industry / product categories, visited websites, access times)
- meta / communication data (e.g., device information, IP addresses , access times)

Processing of special categories of data (Article 9.1 GDPR):



We **do generally not process** data on racial and ethnic origin, political opinions, religious and ideological convictions, to the trade union affiliation, genetic data, biometric data, health data, data on sexual life and orientation.

If such data will be transferred to us (e.g. through online forms or emails), they will be deleted immediately as far as this is recognized and possible. However we refuse any liability for any unrecognized storage of such leaked data.

Persons affected by data processing:

- prospective customers / customers / suppliers / contractors
- visitors / users of the online offer
- subscribers to the newsletter

Purpose of data processing:

According to legal basis GDPR Art.6.1.b

- **responding on requests and communication with interested parties**
- **fulfilment of contracts, service and customer care**

According to legal basis GDPR Art.6.1.c

- **fiscal business execution and other legal requirements**

According to legal basis GDPR Art.6.1.f (our legitimate interests)

- **marketing , advertising , acquisition**
- **providing online services, its contents and functions**
- **safety measures**

With your explicit consent according to legal basis GDPR Art.6.1.a and GDPR Art.7

- **providing and submission of the newsletter**

Contacting us

When contacting us (personally, by phone, e-mail, contact form), the details of the interested parties for processing the contact request will be processed acc. to Art. 6.1.b

Fulfilment of contracts, service and customer care

We process contact data (e.g. names and addresses of contract partners), contract data (e.g. deliveries, services used, names of contact persons, payment information) for the purpose of fulfilling our contractual obligations and services pursuant to Art. 6.1.b GDPR.

Furthermore, we store information on suppliers, promoters and other business partners on the basis of our business interests, e.g. for the purpose of contacting you later. We store such company-related data permanently.

Administration, financial accounting, office organization

We process data in the context of administrative tasks as well as the organization of our business, financial accounting and compliance with legal obligations, such as archiving. In doing so, we process the same data that we process in the course of rendering our contractual obligations. The processing principles are Art. 6.1.c GDPR and Art. 6.1.f GDPR. The processing affects customers, prospects, business partners and website visitors. The purpose and interest in processing lies in administration, financial accounting, office organization, data archiving, that is, tasks that serve to maintain our business, perform our obligations and provide our services. The deletion of the data in terms of contractual performance and contractual communication corresponds to the information provided in these processing activities.

In doing so, we disclose or transmit data to the financial administration, consultants, such as tax accountants or auditors, as well as billing centres and payment service providers.

Business analysis and market research

In order to operate our company economically in a competitive environment and to be able to recognize market trends, customer and user requirements, we analyse existing data for the purposes of business analysis, marketing, market research and acquisition.

We process contact data, communication data, contract data, payment data, usage data, metadata, and publicly made or approved transmitted us data you generate product categories and machinery used.

We can create customer profiles and make predictions about buying behaviour. The analyses will not be disclosed externally unless they are anonymous, aggregated value analyses.

Insofar as the above-mentioned data are processed on the level of an individual (not a company) this is done on the basis of Art. 6.1.a GDPR or Art. 6.1.f GDPR.

Deleting Data

1. Personal data processed by us will be deleted or restricted in their processing in accordance with articles 17 , 18 and 21 GDPR.
2. Unless explicitly stated in this privacy policy, the data stored by us are deleted as soon as they are no longer required for their purpose and the deletion does not conflict with any legal storage requirements. Unless the data is deleted because it is required for other and legitimate purposes, its processing will be restricted. This means that the data is blocked and not processed for other purposes. This applies, for example, to data that must be kept for commercial or tax reasons.
3. We are underlying the legal archiving periods of Switzerland OR Art. 962 as well as the states of our affiliate companies.
Usually we will store/archive data for 10 years after the last entries for a business transaction have been made and fiscal documents have been created.

Rights of the affected individuals



According to Art. 15 GDPR you have the right to ask for confirmation if we process your personal data and which data we process. You may also ask for a copy of such data.



According to Art. 16 GDPR you have the right to the completion of your concerned data or correction of incorrect data.



In accordance with Art. 17 GDPR, you have the right to claim that data in question be deleted without delay, or alternatively, in accordance with Art. 18 GDPR , request a restriction of the processing of the data.



In accordance with Art. 20 GDPR you have the right to obtain your personal data, which you provide to us under a contract or consent, in a computer readable format and request their transmission to other persons responsible



In accordance with Art. 7.3 GDPR you have the right to withdraw your consent to process personal data with effect for the future.

Furthermore you can object to the future processing of your personal data in accordance with Art. 21 GDPR at any time. The objection may in particular be made against processing for direct marketing purposes.



As per Art 77 GDPR you have the right to file a complaint with the supervisory authority.

Data security, places of processing your data

1. Your data will be stored in secure areas on our own servers in Switzerland and protected against loss or access by unauthorized persons to the best of our knowledge and belief in accordance with the current state of the art. We do not use cloud computing currently. Our staffs are obliged to secrecy.
2. In case in course of the processing of data we lay open any data to third parties, convey data to them or provide access to the data otherwise, this is done solely on the basis of a legal permit (for example, when a transfer of data to third parties such as payment service providers, according to Art. 6.1.b GDPR is required to fulfil the contract). Either you have consented or we have a legal obligation or we do so based on our legitimate interests (e.g. external backup solutions, hosting service providers, tax consultants, etc.).
3. If we use third parties for the processing of data this is done on the basis of Art. 28 GDPR by means of a data processing service agreement.
4. If we process data in a third country (i.e. outside the European Union (EU) or the European Economic Area (EEA)) or in the context of the use of third party services or disclosure or transmission of data to third parties, this will be done only to fulfil our (pre)contractual obligations, or on the basis of your consent, or on the basis of a legal obligation or on the basis of our legitimate interests. Subject to legal or contractual permissions, we process or have the data processed in a third country only in the presence of the special conditions of Art. 44 ff. GDPR. This means, for example, that the processing takes place on the basis of special guarantees, such as the officially recognized level of data protection (e.g. for the USA through the "Privacy Shield") or compliance with officially recognized special contractual obligations (so-called "standard contractual clauses").

Email, Telephone, external File Systems

For email and telephone traffic we use the European cloud services of MICROSOFT and the telecommunication software TEAMS. Incoming email traffic is checked for spam and malware. Likewise, files are partially outsourced to the Microsoft Cloud.

Online offer, website

1. For the purpose of the operation of our online offer there is a service agreement with a hosting service provider in Switzerland. Contracted hosting services include the provision of infrastructure and platform services, computing power, storage and database services, security services and technical maintenance services.
2. Here we, or our hosting service provider, process contact data, content data, contract data, usage data, meta and communication data of customers, interested parties and visitors of our online offer on the basis of our legitimate interests on an efficient and secure provision of this online offer acc. to Art. 6.1.f GDPR connected with Art. 28 GDPR (conclusion of data processing service agreement).
3. For security reasons and to protect the transfer of personal data, our website uses SSL or TLS encryption

collection of access data when calling our website

1. On the basis of our legitimate interests on the functionality and improvement of our website within the meaning of Art. 6.1.f GDPR we record data about every access to our web-server. The recorded data may include the retrieved web page or file (URL), the date and

time of the retrieval, the amount of data transferred, the message about successful retrieval, browser type and version, the user's operating system, the URL of the previously visited page, the calling IP address and provider.

2. Any email correspondence you receive from us may contain links to our website. Such links may submit your company identification to our webserver. This allows us to identify your company, but not any individual working in your company. The information obtained this way serves to improve our marketing and to identify the activity of your company.
3. If you have given us consent pursuant to GDPR Art. 6.1.a our newsletter and other e-mail correspondence may contain links to our website which transfer your personal identification to our webserver. The information obtained in this way serves to improve our marketing and to better understand your professional interests.

Integration of services and content of third parties

1. Based on our legitimate interests we rely on (i.e. interest in the analysis, optimization and economic operation of our online offer as defined in Art. 6.1.f GDPR) content and services of third-parties and incorporate their content and services in our online offer (collectively referred to herein as "content"). This always presupposes that the third-party providers of such content perceive the IP address of the users, since they could not send the content to their browser without the IP address. The IP address is therefore required for the presentation of this content. We endeavour to use only content whose respective providers use the IP address solely for the delivery of the content. Third parties may also use so-called pixel tags (invisible graphics, also referred to as "web beacons") for statistical or marketing purposes. The "pixel tags" can be used to evaluate information such as visitor traffic on the pages of this website. The pseudonymous information may also be stored in cookies on the user's device and may include, but is not limited to, technical information about the browser and operating system, referring web sites, visit time, and other information regarding the use of our online offer.
2. In the following we provide an overview of third-party providers as well as their contents, as well as links to their privacy statements, which contain further notes on the processing of data and, in some cases already mentioned here, possibilities of contradiction (so-called opt-out):

YouTube

We embed videos on the YouTube platform of Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

Privacy policy: <https://www.google.com/policies/privacy/>

Opt-Out: <https://adssettings.google.com/authenticated>

Bidlogix

For our auction offer we use the online services of Bidlogix Ltd, 12-13 Ship Street, GB-BN11AD Brighton, UK. User data of our auctions are stored on the basis of a data processing agreement.

Newsletter

1. With the following information we inform you about the contents of our newsletter as well as the registration, submission and evaluation procedures as well as your right of objection. By subscribing to our newsletter, you agree to the receipt of the newsletter and the procedures described.
2. We will submit newsletters and other advertisement only with the consent of the recipients in accordance with GDPR Art. 6.1.a or another legal permit.
3. Double opt-in and logging: Registration for our newsletter is done in a so-called double-opt-in procedure. This means the registration procedure includes the submission of a confirmation email to your email account. Only when you confirm the email, your registration will be completed. This is necessary to avoid that somebody else is registering with your email address.

The registration for the newsletter will be logged in order to prove the registration process according to the legal requirements. This includes the storage of the login and the confirmation time, as well as the IP address. The logging of the registration process is based on our legitimate interests in accordance with Art. 6.1.a GDPR and serves as proof of consent to the receipt of the newsletter.

4. In order to register for the newsletter, we need your name, your e-mail address, your company name and the information on whether you are a machine trader or not.
Optionally, we ask you for information about your company's area of activity.
We reserve the right to review newsletter subscriptions and cancel individual subscriptions at any time when we consider our legitimate interests violated.
5. We individualize the content of our newsletters, e-mails and other electronic notifications. Each subscriber receives advertising information regarding our products, offers, promotions and our company tailored to his needs.
The more relevant information we have about your field of activity and the machines you use, the better the content selection made by the algorithm.
6. Our newsletter and other e-mail correspondence may contain links with your personal identification included, which connect to our webserver either upon opening of the e-mail or by clicking the link. The web server will record the URLs of the web pages called during the session, date and time of the call, browser type and version, your IP address and your personal identification.
Information retrieved this way will be used by us both for statistical as well as individual analysis. The statistical analysis will be used for technical improvements of the newsletter and our online services. The individual analysis serves the individualisation of the newsletter and our acquisition team.
You may turn off logging by disabling JavaScript in your browser settings. If JavaScript is disabled, this may disturb some other functions of our online service.
7. Termination / Revocation - Subscribers to the newsletter may terminate their subscription at any time, i.e. withdraw your consent. You will find a link to cancel the newsletter at the end of each newsletter. Upon termination of your newsletter subscription, your consent to data logging as per clause 6 expires at the same time. Separate revocation of the logging not possible unfortunately since this is an integrated function to define the content of newsletters. With deregistration of the newsletter, your personal data will only be stored to the extent that is permitted under Art. 6.1.b or 6.1.f GDPR only. Based on our legitimate interests, we store e-mail addresses of withdrawn subscriptions in order to provide evidence of previously given consent. An individual request for complete cancellation of your personal data as per Art. 17 GDPR is possible at any time, provided that the former existence of consent is confirmed at the same time.

Online activities in social media

1. Based on our legitimate interests within the meaning of Art. 6.1.f GDPR we may maintain online presences within social networks and platforms to communicate with customers, prospects and users and to inform them about our products and services. When calling up the respective networks and platforms, the terms and conditions and the data processing guidelines of their respective operators apply.
2. Unless otherwise stated in our privacy policy, we process the users' data as far as they communicate with us within the social networks and platforms, e.g. write articles on our online presence or send us messages.

Changes and updates to the data privacy notice

We kindly ask you to check the content of our data privacy notice regularly. We will adjust the data privacy notice as soon as we change the processing of personal data or changes in the legislation make an amendment necessary. We will inform you as soon as any changes require your participation (e.g. consent) or other individual notification.