



DATA PRIVACY STATEMENT – OUR WEBSITE AND YOUR DATA

This statement is compulsory in accordance with the General Data Protection Regulation (DSGVO).

1. PRELIMINARY NOTE

The following sections provide you with information concerning all aspects of our dealings with your personal data. The legislator has stipulated which information is necessary. If you would like to know more, please see the DSGVO Art. 12-22 and 34. The complete text of the DSGVO is available online at: www.datenschutz-grundverordnung.eu. If you have any questions about the DSGVO, please contact our data protection officer and/or administration.

2. WHAT ARE PERSONAL DATA?

All information pertaining to a defined or definable person. Persons are definable if they can be directly or indirectly identified. This can, for example, be the result of tracking an identifier such as a name, an identification number, location data, an online identifier or one or more specific characteristics.

3. BASIC INFORMATION

3.1. Who is responsible for processing my data?

Responsibility for data processing in connection with our online shop is held by:

steute-online-Schaltgeräte GmbH & Co. KG, Holster Str. 116, 49324 Melle

Responsibility for all other data processing is held by:

steute Technologies GmbH & Co. KG, Brückenstr. 91, 32584 Löhne.

3.2. How can I contact you?

Contact partner: Susanne Ruge

Email: datenschutz@steute.com

3.3. Which regulatory body is responsible for controlling and enforcing data protection?

LDI, Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen,

Frau Helga Block, Postfach 20 04 44, 40102 Düsseldorf, Germany

Tel.: 0049 211/38424-0, Fax: 0049 211/38424-10, Email: poststelle@ldi.nrw.de

3.4. How can I contact the data protection officer at your company?

The data protection officer for steute is the SK-Consulting Group GmbH, Herr Lüllemann.

Contact as follows:

Email: datenschutz@steute.com



4. ADDITIONAL IMPORTANT INFORMATION

4.1. Why does your company process my data?

Data are collected and processed in order to deal with your ongoing concerns, as well as to improve the user-friendliness of our website.

4.2. Why is your company permitted to process my data?

Current data protection legislation (= EU General Data Protection Regulation) permits the processing of your data (= personal data) if we have a legitimate interest (see 4.1) and can assume that you have no serious objections (Legitimate interest, Art. 6 Par. 1 it. f DSGVO). You can withdraw your consent at any time.

Whenever you use our online shop, the DSGVO permits us to process your data for the purposes of initiating and closing a contract with you in accordance with Art. 6 Par. 1 lit. b DSGVO.

If you have given us your consent, for example in order to receive our Newsletter or with regard to cookies, etc., if applicable for the transfer of data to our subsidiary, the General Data Protection Regulation permits us to process your data in accordance with Art. 6 Par. 1 lit. a DSGVO.

4.3. Which data of mine are collected?

- IP address in an anonymised form to identify the point of access
- referrer (previously visited website)
- requested internet page or file
- browser type and browser version
- operating system used
- device type used
- time and date of access
- as well as data which you communicate to us directly

4.4. In which statistics are my data used?

If you have declared your consent, the following anonymised statistics will be collected:

- visitor numbers: visitors, sessions, pages called up, search engine robots;
- visitor behaviour: duration of sessions, pages called up per session, drop-off rate;
- page analysis: entry pages, exit pages, error pages, most-visited pages, pages with a high drop-off rate, search terms;
- original pages: all original pages, referring pages;
- visitor locations;
- browsers and systems: browsers, browser versions, operating systems, operating system versions.

4.5. Who can my data be passed on to?

Within the framework of data processing, your anonymised data can be viewed by our contractually bound website provider. Anonymised means that the data cannot be matched to you.

They can also be passed on to third-party service providers who help us to optimise our website and who receive your data in accordance with your declaration of consent.



If you are located in France or Italy, we will pass on your data to our subsidiary in France (**steute France SARL**, Inovallee 31C, Chemin du vieux chêne, F - 38240 Meylan) or Italy (**steute Italia srl**, Via Curtatone, 1, I - 20019 Settimo Milanese (MI)) to facilitate direct communication with your responsible contact partner.

On the basis of our legitimate interests (i.e. interest in the analysis, optimisation and economic efficiency of our online presentation in line with Art. 6 Par. 1 lit. f DSGVO), our website includes contents from third-party service providers, e.g. website analyses or the inclusion of specific fonts (hereafter "contents"). The provision of such contents always requires the IP address of the user to be passed on to the third-party provider because the contents could not be sent to the user's browser otherwise. Contents can only be presented on the screen when the IP address is known.

During the processing of contact form queries, your data could be passed on to:

- persons within our company who are directly involved in data processing
- service providers who are contractually bound to secrecy and who assume some data processing tasks for us
- external companies, where absolutely necessary. Examples include post office workers delivering letters, our own subsidiaries and our own sales partners.

4.6. Will my data be passed on to countries outside the EU?

There is no principal contractual agreement to this effect. In exceptional cases, the full IP address could be passed on to a Google server in the USA and anonymised there.

The transfer of personal data involves privacy-related risks for persons whose data are transferred to the USA.

US authorities (esp. secret services) have inspection rights (in particular acc. to Section 702 of the Foreign Intelligence Surveillance Acts [FISA 702] and Executive Order 12 333) which EU citizens are unable to refute. This US-American legal basis permits access to data from electronic communication services used by non-US citizens, without a court order or property rights.

Accordingly, with regard to legal protection in the courts, EU citizens do not have the same legal options (right of appeal) as American citizens to stop the processing of personal data by the American authorities.

The US conducts data processing on a grand scale, without granting a degree of protection corresponding to that guaranteed in the EU by Art. 7 (respect for private and family life) and Art. 8 (protection of personal data) of the EU Charter of Fundamental Rights.

They can also be passed on to third-party service providers in other countries, who help us to optimise our website and who receive your data in accordance with your declaration of consent.

4.7. How long will you store my data?

Your IP address is anonymised by our internet provider from the first day. Data entered on our contact form, our newsletter registration form or our Shop registration form are stored for the period of time required in order to process your request. (We store your data for as long as is necessary in order to fulfil the purposes laid out in Section 4.4.). However, some legislation (e.g. the German Tax Code § 147) compels us to keep certain data for 6 or 10 years. At the end of this period, all data no longer required will be deleted.

4.8. Newsletter

For registrations to our Newsletter, we use the so-called double-opt-in procedure. This means that once you have sent us your email address we will send you a confirmation email in which we in turn ask you to confirm that you wish to receive our Newsletter. If you do not confirm within 24 hours, your registration will automatically be deleted.

Once you have confirmed your wish to receive our Newsletter, we will store your email address until you decide to cancel the Newsletter. Storage serves the sole purpose of being able to send you the Newsletter. In addition, during the



registration and confirmation processes we will store your IP address and the date/time to exclude fraudulent use of your personal data.

Compulsory fields for receipt of our Newsletter are marked. Completion of other, non-marked fields is voluntary and will only be used to personalise the Newsletter. Your data will not be passed on to third parties.

If you are located in France or Italy, we will pass on your data to our subsidiary in France (**steute France SARL**, Inovallee 31C, Chemin du vieux chêne, F - 38240 Meylan) or Italy (**steute Italia srl**, Via Curtatone, 1, I - 20019 Settimo Milanese (MI)) to facilitate direct communication with your responsible contact partner.

You can withdraw your consent at any time by sending an email to news@steute.com or by writing to the contact address stated in our Imprint. Following withdrawal of your consent, all your data will be deleted.

4.9. Contact form

If you send a query to us via our contact form, the details you state on the form, including your contact data, will be stored by us for the purposes of processing your query and in case of any follow-up questions. We will not pass on any data without your consent.

Processing of your data as stated on the contact form is exclusively on the basis of your consent (Art. 6 Par. 1 lit. a DSGVO). You can withdraw your consent at any time. A simple email to our address is sufficient. The legality of all acts of data processing before your consent is withdrawn remains unaffected by the withdrawal of your consent.

The details you state on the contact form will remain stored by us until you ask us to delete them, until you withdraw your consent to data storage, or until the purpose of the data storage becomes null and void (e.g. upon completion of the processing of your request). Mandatory legal regulations – especially retention periods – remain unaffected.

5. THIRD PARTIES

On the basis of our legitimate interests (i.e. interest in the analysis, optimisation and economic efficiency of our online presentation in line with Art. 6 Par. 1 lit. f DSGVO) or on the basis of your given consent in line with Art. 6 Par. 1 lit. a DSGVO, our website includes contents from third-party service providers, e.g. website analyses or the inclusion of specific fonts (hereafter "contents"). The provision of such contents always requires the IP address of the user to be passed on to the third-party provider because the contents could not be sent to the user's browser otherwise. Contents can only be presented on the screen when the IP address is known.

5.1. Google Analytics

Provided that you have declared your consent, we use Google Analytics, a web analysis service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("Google").

Google Analytics uses cookies, which are small text files stored on your computer to enable us to analyse your use of our website. Usually the cookies are transferred to a Google server in the USA and stored there. Before this happens, however, your IP address is anonymised by Google within a member state of the European Union or another state party to the agreement concerning the European Economic Area. Anonymisation means that the data can no longer be matched to you. In exceptional cases, the full IP address is transferred to a Google server in the USA and anonymised there. The IP address transferred from your browser in connection with Google Analytics is not combined with any other Google data. For more information about conditions of use and data protection go to <https://www.google.com/analytics/terms/de.html> or <https://policies.google.com/?hl=de>.

Under contractual obligation to us, Google then uses this information to evaluate access to our website, compile reports about website activities and provide us with other services surrounding website and internet use.



The legal basis for the use of Google Analytics is your consent in accordance with Art. 6 Par. 1 S.1 lit. a DSGVO and our legitimate interest in accordance with Art. 6 Abs. 1 S. 1 lit. f DSGVO. The website operator has a legitimate interest in the analysis of user behaviour in order to optimise both its website and its advertising.

Data transferred by us which are linked to cookies or user identification are automatically deleted by Google after 26 months. Once a month, data which have reached their storage limit are automatically deleted.

You can withdraw your consent at any time and with future effect by changing your browser setting in order to prevent cookies from being stored; however, we would like to point out that in this case the functionality of this website may be impaired.

Alternatively, you can prevent Google from recording and processing your data (incl. your IP address) by going to <https://tools.google.com/dlpage/gaoptout?hl=de> and downloading and installing the browser add-on. Opt-out cookies prevent any future recording of your data when accessing this website.

5.2. Google Ads, Google Conversion Tracking and Google Ads Conversion Tracking

Provided that you have declared your consent, this website uses Google Ads. Google Ads is an online advertising software from Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("Google").

Within the framework of Google Ads, we use so-called conversion tracking. If you click on an ad placed with Google, a cookie is set for conversion tracking. Cookies are small text files which are installed on the internet browser of the user's computer. These cookies become invalid after 30 days and do not identify users personally. If a user accesses a page and clicks on the ad, then provided that the cookie is still valid, Google and we can recognise that a user clicked on the ad and was re-routed to our website.

Within the framework of Google Ads, we use so-called Google Ads (GAds) Call Conversion Tracking. If you click on our displayed telephone number within a Google ad, a call will be placed to a Google forwarding number. Calls are counted as conversions (= successful advertising) once a minimum length of time has elapsed. If a user clicks on our Google ad and then calls one of the Google forwarding numbers displayed on our website, that call will also be counted as a conversion (= successful advertising) once a defined minimum length of time has elapsed.

Every Google Ads customer receives a different cookie, and cookies cannot be traced via the websites of Google Ads customers. The information collected with the help of conversion cookies serves to compile conversion statistics for Google Ads customers who have opted for conversion tracking. Customers can see the total number of users who clicked on their ad and were re-routed to the page marked with a conversion tracking tag. However, they cannot see who those users were.

If you would like to block this tracking process, you can adjust your browser so that it will inform you whenever cookies are about to be installed and will then only permit cookies in certain cases, and/or will exclude cookies in certain cases or in general, and/or will activate an automatic deletion of cookies as soon as the browser is closed. Deactivating cookies may impair the functionality of this website.

"Conversion cookies" are stored in accordance with Art. 6 Par. 1 lit. a DSGVO (= your consent). The website operator has a legitimate interest in the analysis of user behaviour in order to optimise both its website and its advertising.

For more information about Google Ads and Google Conversion Tracking, go to the Google data privacy statement at: <https://www.google.de/policies/privacy/>.



5.3. Google Tag Manager

Provided that you have declared your consent, this website uses Google Tag Manager from Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("Google"). Google Tag Manager is a solution enabling marketers and webmasters to manage website tags via an interface without support from the IT department. Code snippets such as tracking codes can be integrated by Tag Manager in the company website without modification of the source code. The tool Google Tag Manager itself (which deploys the tags) does not use cookies and does not record any personal data. It only triggers other tags, which in turn may or may not record data. Google Tag Manager does not access such data. If you have selected the deactivation mode at the domain or cookie level, this remains valid for all tracking tags deployed by Google Tag Manager. The tool will not change your cookie settings.

For further information please see the Google [user guide](#) and the Google [privacy guide](#).

5.4. Gstatic

Provided that you have declared your consent, our website loads a web service from the company Google Ireland Limited, Gordon House, Barrow Street, 4 Dublin, Ireland (hereinafter: Gstatic).

We use these data in order to guarantee the full functionality of our website.

In this context your browser will transfer personal data to Gstatic if applicable.

The legal basis for data processing is Art. 6 Par. 1 lit. f DSGVO.

Please go to the Gstatic data privacy statement from Google for more information about the handling of data: <https://policies.google.com/privacy>.

You can prevent the acquisition and processing of your data by Gstatic by deactivating the script code in your browser or by installing a script blocker in your browser (find this by going to e.g. www.noscript.net or www.ghostery.com).

5.5. YouTube with extended data protection

Our website uses plugins from the website YouTube. YouTube is operated by Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

We use YouTube in its "extended data protection mode". According to YouTube, this is a mode which ensures that no information about visitors to our website is stored by YouTube before a video is viewed. However, the "extended data protection mode" does not expressly exclude the transferral of data to YouTube partners. For example, YouTube is connected – independently of whether or not you view a video – to the Google DoubleClick network.

As soon as you start playing a YouTube video on our website, a connection is made to the YouTube servers. The YouTube servers are notified about your visit to our pages. If you are logged into your YouTube account, YouTube can make a direct link between your surfing behaviour and your personal profile. You can prevent this by logging out of your YouTube account beforehand.

Moreover, as soon as you start a video, YouTube can store various cookies on your device. YouTube uses these cookies to gain information about visitors to our website. This information is used e.g. for statistics regarding the videos, to improve user-friendliness or to prevent attempted fraud. Cookies remain on your device until you delete them.

It is also possible that starting a YouTube video could trigger data processing steps beyond our control.

For further information about data protection at YouTube, please go to their data privacy statement at: https://www.youtube.com/t/privacy_at_youtube."



5.6. Hotjar

Provided that you have declared your consent, we use [Hotjar](#) in order to better understand our users' needs and to optimize this service and experience. Hotjar is a technology service that helps us better understand our users experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behavior and their devices (in particular device's IP address (captured and stored only in anonymized form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), preferred language used to display our website). Hotjar stores this information in a pseudonymized user profile. Neither Hotjar nor we will ever use this information to identify individual users or to match it with further data on an individual user. For further details, please see Hotjar's privacy policy by clicking on [this link](#).

Processing is on the basis of Art. 6 Par. 1 lit. a DSGVO (= your consent).

You can opt-out to the creation of a user profile, Hotjar's storing of data about your usage of our site and Hotjar's use of tracking cookies on other websites by following this [opt-out link](#).

6. WHAT ARE MY RIGHTS?

6.1. Your rights

As a party affected by data processing, the DSGVO affords you various rights (in the following collectively referred to as the "rights of affected parties") which include:

6.2. Right to know (acc. to Art. 15 DSGVO)

You have the right to know whether or not we are processing your personal data. If we are processing your personal data, you have the right to know:

- why we are processing your data (see also 4.1);
- what type of data we are processing;
- who is receiving or will be receiving your data (see also 4.5);
- how long we will store your data; in the event that it is impossible to specify the exact duration, we must inform you of the reasons for prolonged storage (e.g. periods required by law) (see also 4.7);
- that you have the right to correct or delete all data concerning your person, including the right to restrict processing and/or to opt out (see also 6.3 following, 6.4 and thereafter);
- that you have the right to complain to a regulatory body;
- where your data came from, in the event that we did not receive this information directly from you;
- whether your data are used for automated decision-making and, if not, to know which logic underlies the decision-making process, as well as how far-reaching the impact of the automated decision-making process can be for you;
- that, if your personal data should ever be transferred to a country outside the EU, you have the right to know whether the data recipient can ensure an appropriate level of data protection and with what level of guarantee;
- that you have the right to demand a copy of all your personal data. Copies of data are always issued in digital form.

The first copy is free of charge, any additional copies can be made available at a reasonable rate. A copy can only be made available if this does not violate the rights of other persons.



6.3. Right to correct data (acc. to Art. 16 DSGVO)

You have the right to demand that we correct your data if information should be incorrect or incomplete. This also includes the right to supplement data with additional explanations or comments. Any correction and/or supplementation must be performed without culpable delay.

6.4. Right to delete personal data (acc. to Art. 17 DSGVO)

You have the right to demand that we delete your personal data if:

- the data are no longer required for the purposes for which they were originally collected and processed;
- the data processing took place on the basis of consent given by you and you have since withdrawn that consent; this does not apply, however, if legal permission for the data processing has been granted from another source;
- you have objected to data processing as permitted by the so-called "legitimate interest" clause (acc. to Art. 6 Par. 1 letters e or f); deletion is not compulsory, however, should higher-ranking reasons for further data processing exist;
- you have objected to data processing for the purpose of direct advertising;
- your personal data have been processed unlawfully;
- the data belong to a child and were collected for the information society (= electronic service) on the basis of consent (acc. to Art. 8 Par. 1 DSGVO).

A right to delete personal data does not exist if:

- the wish for deletion directly opposes the right to freedom of opinion and information;
- the processing of personal data is required
 - to fulfil a legal obligation (e.g. legally stipulated storage periods),
 - to fulfil public tasks and interests in accordance with current legislation (including "public health"),
 - for archiving and/or research purposes
- the personal data are required in order to assert, pursue or defend a legal claim.

Deletion must be immediate (without culpable delay). If personal data have been published by us (e.g. online), it is our duty to inform other data processors about the request for deletion, including the deletion of links, copies and/or replications, within the realms of technical possibility.

6.5. Right to restrict data processing (acc. to Art. 18 DSGVO)

You have the right to restrict the processing of your personal data in the following cases:

- if you are disputing the accuracy of your personal data, you can demand that we cease to use your data and thus restrict further processing until the case has been reviewed;
- if data processing has been unlawful, you can demand that data use is restricted instead of demanding that data be deleted;
- if you need your personal data to assert, pursue or defend a legal claim, but we no longer require your data, then you can demand that processing be restricted to the purposes of preparing your claim;
- if you have objected to data processing (acc. to Art. 21 Abs. 1 DSGVO) (see also 6.7) and if it is still under review whether our interests in processing are higher-ranking than your interests, then you can demand that your data not be used for other purposes during the review procedure, thus restricting further processing.

Personal data subject to restricted processing at your request may only – with the exception of storage – be processed:

- with your consent;
- to assert, pursue or defend legal claims;
- to protect the rights of other natural or legal persons;
- in the event of an important public interest.

If restricted processing should be overturned, you will be informed in advance.



6.6. Right to transfer of data (acc. to Art. 20 DSGVO)

You have the right to demand that we transfer to you in a known electronic format (e.g. a PDF or Excel document) your personal data collected by us.

You can also demand that data are sent directly to another company (specified by you), provided that this is within the realms of technical possibility.

You have this right provided that processing is performed on the basis of consent, or in order to fulfil a contract (see 4.2.) and with the aid of automated procedures.

Exertion of the right to transfer of data must not violate the rights and freedoms of other persons. Should you exert the right to transfer of data, you still retain the right to delete data acc. to Art. 17 DSGVO.

6.7. Right to opt out of certain types of data processing (acc. to Art. 21 DSGVO)

If your data are processed in order to fulfil tasks in the public interest or to fulfil legitimate interests (see 4.2), you can opt out of this procedure. To do this you must inform us of the reasons for your objection resulting from your individual situation. Reasons could include e.g. private circumstances or a need for secrecy worthy of protection.

Should you choose to opt out, we are bound to refrain from processing your data for the purposes listed under 4.1 unless:

- there are reasons worthy of protection for processing your data which are higher-ranking than your interests, rights and freedoms, or
- processing is necessary in order to assert, pursue or defend a legal claim.

You can object to use of your data for the purpose of direct advertising at any time; this also applies to profiling if it is linked to direct advertising. Should you choose to opt out, we are bound to refrain from using your data for direct advertising purposes.

⇒ In no cases do we initiate or perform direct advertising and/or profiling.

6.8. Prohibition of automated decision-making/profiling (acc. to Art. 22 DSGVO)

Decisions made by us which have legal consequences for you or which could burden you considerably must not be based exclusively on automated processing of personal data. This includes profiling. This prohibition does not apply if an automated decision:

- is required for the completion or fulfilment of a contract with you;
- is permissible due to legal stipulations, provided that these stipulations contain appropriate measures to protect your rights and freedoms, as well as your legitimate interests; or
- is reached with your express consent.

Decisions which are based exclusively on automated processing of *particular categories of personal data* (= sensitive data) are only permissible if:

- they are reached with your express consent; or
- there is considerable public interest in the processing of data; and
- appropriate measures have been taken to protect your rights and freedoms, as well as your legitimate interests.

6.9. Exertion of rights as an affected party

In order to exert your rights as an affected party, please apply to the bodies named in Section 3. Requests submitted electronically will generally be replied to electronically. The information, correspondence and measures which we must provide and take acc. to DSGVO, including those pertaining to the exertion of rights as an affected party, are fundamentally free of charge. Only in cases where requests are obviously unjustified or excessive are we permitted to



levy an appropriate charge for our administrative costs, or to refuse to comply with the request (acc. to Art. 12 Par. 5 DSGVO).

If legitimate doubts exist about your identity, we are permitted to demand additional information from you for identification purposes. If it is not possible for us to identify you, we have the right to refuse to comply with your request. We shall inform you separately should identification prove impossible – provided it is within our power to do so (see Art. 12 Par. 6 and Art. 11 DSGVO).

Requests for disclosures and information will usually be managed immediately, at the latest within one month after receipt of the request. This period can be extended by a further two months if necessary due to the complexity and/or number of requests; in the event of a delay, we will inform you of this and give reasons for the delay, at the latest within one month of receiving your request. If we should fail to comply with a request, we will inform you of the reasons for this immediately, at the latest one month after receiving the request, as well as inform you about your options regarding a complaint to a regulatory body and/or the claiming of legal aid (see Art. 12 Par. 3 and Par. 4 DSGVO).

Please note that you can only exert your rights as an affected party within the framework of restrictions and limitations stipulated by the European Union or its member states (Art. 23 DSGVO)

6.10. Must I grant access to my data?

In order for us to fulfil the conditions laid out in Section 4.1, it is necessary that you grant us access to your personal data.

In order to finalise and implement a contract with you, it is crucial for us and also a legal requirement. If you do not grant us access to your data, we cannot enter into a contract with you.

Should you have a complaint, you can apply to the appropriate regulatory body at any time. The regulatory body named in Section 3.3. is responsible for our company.

You have the right to go to court against a regulatory body acc. to Art. 78 DSGVO, and against our company acc. to Art. 79 DSGVO.

6.11. Automated decision-making/ profiling

We perform no automated decision-making or profiling.