



BRIGHT MINDS,
BRIGHT LIGHTS.

DATA PRIVACY STATEMENT AND COOKIE PROVISIONS

Version: April 2019

ZKW Group GmbH, Rottenhauser Strasse 8, 3250 Wieselburg, is a controller within the meaning of the European Union's General Data Protection Regulation (GDPR) with a view to the processing of personal data within the scope of the online offer on this website.

By way of this information on data protection, we inform you about the processing of personal data by

- **ZKW Group GmbH**, Rottenhauser Str. 8, 3250 Wieselburg (office@zkw-group.com),
- **ZKW Elektronik GmbH**, Samuel Morse Str. 18, 2700 Wiener Neustadt (office@zkw-elektronik.at) as well as
- **ZKW Lichtsysteme GmbH**, Scheibbs Str. 17, 3250 Wieselburg (office@zkw.at).

Protecting your personal data is of special importance to us. We process your data exclusively on the basis of applicable legal provisions, in particular the General Data Protection Regulation of the EU (GDPR), the Austrian telecommunications act (TKG 2003), and the Austrian data privacy act (DSG), as amended.

1) Getting into contact with us

If you get into contact with us by using a form on the website or by e-mail, we will process personal data provided by you to respond to your request to carry out pre-contractual measures. If no contractual relationship is sought with us, processing will take place on the basis of our legitimate interest in processing your enquiry.

2) Social media activities

If you get into contact with us via our social media pages on Facebook, Twitter, LinkedIn, Xununu, YouTube or GoogleMyBusiness, we will process the data provided by you to answer your enquiry for carrying out pre-contractual measures or within the scope of our legitimate interest. We may equally process your data, to the extent it is available on these platforms, for the purpose of internal analyses or for marketing purposes to serve our legitimate interest.

For this purpose, we will transmit your personal data to the respective operator of the social media platform.

In that context, your data will also be transmitted to a third country outside the EEA. Facebook and Google dispose of a Privacy Shield certification; within that scope an adequate level of data protection was confirmed by the EU Commission for the USA. Detailed information in this respect is available through the following link: <https://eur-lex.europa.eu/legal-content/DE/TXT/PDF/?uri=CELEX:32016D1250&from=DE>

3) Supplier portal

Upon registration at our supplier portal, we will process the personal data provided by you for the purpose of contract performance and to carry out pre-contractual measures for the following purposes: processing of quotations and requests, management and settlement of contracts, current customer care and provision of information, management of master data and changes to contract information.



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The conclusion and performance of a contract with us are only possible if we process your personal data.

For this purpose and within the scope our legitimate interest, we will transmit your personal data to our group companies, to public authorities or courts (to the extent required), to lawyers, tax consultants and certified public accountants, to debt collection agencies.

Our group companies are also situated in third countries outside the European Economic Area. We will transmit your personal data to them, provided that the European Commission confirms an adequate level of data protection or if other appropriate data privacy guarantees exist. ZKW has agreed EU standard contract clauses with ZKW companies outside the EEA. Detailed information in this respect is available through the following link: <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:039:0005:0018:DE:PDF>. You may also request this information at the above-stated contact address.

4) Whistleblowing portal

Within the scope of the whistleblowing portal implemented on this website, we will process the personal data provided by you on the basis of our legitimate interest in solving and preventing criminal offences. For this purpose, we will transmit the data provided by you to the relevant company within our group. You may also request this information at the below-stated contact address.

5) IT security

Within the scope of our legitimate interest, we will process data relating to the use of our website to ensure IT security and the operation of our IT systems. For this purpose, we will transmit your personal data to our IT service provider.

6) Cookies

Like most websites, we use cookies for a number of purposes, in order to improve usage of our website by you, provided that you have given your consent in this respect (§ 96 (3) TKG 2003 in conjunction with Art 6 (1) (a) GDPR).

To this end, we use Google Analytics, a web analysis service provided by Google Inc. ("Google"). Google Analytics uses so-called cookies, text files that are stored on your computer, enabling your use of the website to be analysed. As a rule, the information generated by cookies regarding your use of the website is transferred to and stored on a server in the USA that is operated by Google.

Google disposes of a Privacy Shield certification; within that scope an adequate level of data protection was confirmed by the EU Commission for the USA. Detailed information in this respect is available through the following link: <https://eur-lex.europa.eu/legal-content/DE/TXT/PDF/?uri=CELEX:32016D1250&from=DE>.

The following information will be collected by Google Analytics: source (country and city), language, operating system, device (PC, tablet PC or smartphone), browser and all add-ons used, screen resolution (on mobile device), source of visitor (Facebook, search engine or referring website), which files were downloaded, which videos were viewed, were any banners clicked on, where did the visitor go to, pages visited on the website, duration of visit on the website.



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Additionally, your IP address will be captured, but pseudonymised immediately by deleting the last 8 bits. Accordingly, only a rough determination of the locality will be possible. No connection will be established either between the IP address sent by your browser within the scope of Google Analytics and any other Google data.

You can prevent the storage of cookies through a corresponding setting in your browser software; please note, however, that in this case you may not be able to use all functions of this website to their full extent. You can also prevent Google from collecting and processing the data relating to your use of the website and generated by the cookie by simply downloading and installing the following browser plug-in by clicking on the following link: <http://tools.google.com/dlpage/gaoptout?hl=de>

7) Use of Google reCAPTCHA

We also use Google's "reCAPTCHA" tool to prevent spam and data abuse and to protect the website from bots. The mode of operation is based on advanced risk analysis technology in order to separate humans from bots. We use this tool in particular to protect forms – in this respect, data are processed based on our legitimate interests to protect our website.

The information recorded by cookies with regard to your use of this website (including your IP address) will be transmitted to and stored by Google servers (usually in the USA or in other countries outside the EU). However, the IP address shall be truncated by Google beforehand within the Member States of the European Union or in other countries that are signatories of the treaty on the European Economic Area. Only in exceptional cases shall the full IP address be sent to a Google server in the USA to be truncated there.

In particular the following information is being collected by Google reCAPTCHA: browser, browser history, type of device, model of device, country, service provider, access date, CSS information, duration of visit, behaviour and clicks on the website, language, operating system, Google cookies already installed, other Google Account details, plug-ins, JavaScript objects.

For more information on Google reCAPTCHA, please refer to <https://developers.google.com/recaptcha/>

For more information on the use of data by Google, please refer to <https://policies.google.com/privacy?hl=en-UK>

8) Contracting partners

As a general rule, personal data of contracting partners (esp. names and contact details of customers and suppliers) will be processed by the ZKW company that the contractual relationship was established with, for the purpose of contract performance.

ZKW Group GmbH processes personal data of contracting partners of its affiliates in a "processor" capacity. Moreover, we will transmit your personal data to the following processors for the provision of services: ZKW Group GmbH as well as external service providers for the purposes of IT administration, IT services, IT support, and IT maintenance.

Any processing/transmission to other ZKW companies shall only take place if this is required for the purpose of contract performance or in individual cases based on a legitimate interest. EU standard contract clauses have been agreed between ZKW and ZKW companies outside the EEA. Detailed information in this respect is



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available through the following link: <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:039:0005:0018:DE:PDF>

Transmission to third parties shall only take place if and to the extent that this is required for contract performance. We will transmit your personal data to them, provided that the European Commission confirms an adequate level of data protection or if other appropriate data privacy guarantees exist.

If a legal dispute occurs during an active contractual relationship or after its termination, the data reasonably required for the litigation will be transferred to legal representatives and courts on the basis of our legitimate interest in establishing, exercising or defending any legal claims.

9) Storage period

For the purpose of processing enquiries (and in case of follow-up enquiries) received through our website or social media pages, we will store the data provided by you for a period of six months. In individual instances (e.g. in case of complaints), we shall keep the personal data for the period during which claims may be asserted against us (statutory period of limitation of 3 or up to 30 years).

Personal data of business partners as well as those that you indicate on our supplier portal will be stored by us on the basis of the retention obligations that we are subject to, for at least seven years after performance of the contract, to the extent that claims may be asserted against us (statutory limitation period of 3 or up to 30 years) or until the resolution of any legal disputes during which the data are needed as evidence.

The user data collected through cookies and for the purpose of IT security that we process will be stored for a period of 2 years.

10) Your rights and contact details

Your rights:

Basically, you are entitled to access your personal data, to rectification, erasure, restriction of processing, and to data portability. If processing is based on your consent, you may revoke such consent, e.g. by e-mail, at any time with future effect.

**As a data subject, you may object to the use of your data at any time, if data processing serves any direct marketing purposes.
You also have the right to object at any time, if relevant reasons arise in this respect from your particular situation.**

To exercise your rights, please contact our data protection coordinator.

If you believe that the processing of your personal data is in violation of data protection legislation or that your data protection rights have been infringed in any other way, you may lodge a complaint with our data protection coordinator or the Data Protection Authority.

You can reach us at the following contact details:

- ZKW Group GmbH, Rottenhauser Str. 8, 3250 Wieselburg (office@zkw-group.com)
- ZKW Elektronik GmbH, Samuel Morse Str. 18, 2700 Wiener Neustadt (office@zkw-elektronik.at)
- ZKW Lichtsysteme GmbH, Scheibbs Str. 17, 3250 Wieselburg (office@zkw.at)



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Our data protection officers are available at datenschutz@zkw-group.com

10) Final provisions

As the Internet evolves, we will continuously adjust these data protection provisions as well. Any changes will be announced on the website in good time. Therefore, you should call up these data protection provisions regularly, in order to bring yourself up to date.