



BRIGHT MINDS,  
BRIGHT LIGHTS.

## DATA PRIVACY STATEMENT AND COOKIE PROVISIONS

Version: August 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](mailto:office@zkw-group.com)),
- **ZKW Elektronik GmbH**, Samuel Morse Str. 18, 2700 Wiener Neustadt ([office@zkw-elektronik.at](mailto:office@zkw-elektronik.at)) as well as
- **ZKW Lichtsysteme GmbH**, Scheibbs Str. 17, 3250 Wieselburg ([office@zkw.at](mailto: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) Contracting parties (inc. supplier portal)

Personal data of contracting parties (in particular names and contact data of customers and suppliers) are generally processed by the ZKW company with which a contractual relationship exists for the purpose of fulfilling the contract.



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When registering in our supplier portal, we process the personal data provided by you for fulfilling the contract and implementing pre-contractual measures for the following purposes: processing offers and applications, contract administration and processing, ongoing support and information, administration of master data and contract data changes. The conclusion and fulfilment of a contract with us is only possible if we process your personal data.

In addition, we use data processors in the following areas: IT administration, service, support and maintenance, order processing including delivery and dispatch of goods, contact and appointment management, legal & compliance (including whistleblowing), marketing.

We transmit personal data to our group companies (<https://zkw-group.com/home/unternehmen/standorte/> and LG Electronics Inc.) only if this is necessary for the fulfilment of the contract or in individual cases due to a justified interest. We have agreed EU standard contract clauses with those companies that are located outside the EEA. Detailed information can be found here: <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:039:0005:0018:DE:PDF>.

If a legal dispute arises during or after the contractual relationship, the data necessary for the appropriate prosecution will be transmitted to legal representatives and courts on the basis of our legitimate interest in asserting, exercising or defending legal claims.

In addition, we transfer your personal data on the basis of legitimate interests to authorities, tax consultants, auditors and debt collection companies. In light of liability risk and the observance of due diligence, audits are carried out in our companies by those responsible themselves or by external independent auditors.

### **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.



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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.

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) 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



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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.

The data registered in the context of the Whistleblowing Portal will be deleted at the latest 2 months after completion of the investigation, personal data collected in the course of audits will be stored until the creation of the audit report. In both cases, however, the following shall apply: if they are further required for the conduct of judicial or administrative proceedings or for further disciplinary or other official proceedings, the registered/collected data shall be stored for as long and to the extent necessary for the conduct and conclusion of such proceedings.

### 9) 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.**

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 officer or the Data Protection Authority. In Austria this is the Austrian Data Protection Authority, Barichgasse 40-42, 1030 Vienna. Before you submit a complaint to the data protection authority or if you wish to exercise your rights or have any other questions, please contact our data protection officer (available at: [datenschutz@zkw-group.com](mailto:datenschutz@zkw-group.com)).

#### You can reach us at the following contact details:

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

Our data protection officers are available at [datenschutz@zkw-group.com](mailto: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.