

DM-032-EN

General Information on Data Processing

2021-04-22

Version 1.2



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Information about the collection and processing of your personal data

Diligence and transparency form the basis of a trusting relationship with our customers. We are therefore informing you about how we process your data and how you can exercise the rights to which you are entitled under the General Data Protection Regulations. Which personal data we process and for what purpose depends on the contractual relationship concerned.



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1. Who is responsible for data processing?

For the data processing each of the following companies are independent responsible:

Elisa camLine Holding GmbH

Industriering 4a, 85238 Petershausen, Germany

Legal representatives: Heinz Linsmaier, Bernhard Jofer

camLine GmbH

Industriering 4a, 85238 Petershausen, Germany

Legal representatives: Heinz Linsmaier, Bernhard Jofer

camLine Dresden GmbH

An den Ellerwiesen 11, 01109 Dresden, Germany

Legal representatives: Frank Böstler, Andreas Strauch

camLine Solutions Srl

Aleea Tudor Neculai 132, 700713 Iasi, Rumanian

Legal representatives: Claudia Antici

camLine Hungary Kft

Semmelweis Ignac utca 2, 9700 Szombathely, Hungary

Legal representatives: Peter Horvath

camLine USA Inc

1170 Howell Mill, Road Suite 300 Atlanta, Atlanta GA 30318, USA

Legal representatives: Andrew Lu

camLine Pte Ltd

18, Kaki Bukit Road 3, #04-20 Entrepreneur Business Centre, 415978 Singapore, Singapore

Legal representatives: Chee Cheong Ng (Bryan Ng), Hong Sin Goh (Mitch Goh)

camLine Pte Ltd

No.43, Datong Street, Banqiao District, New Taipei City 220, Taiwan

Legal representatives: Hong Sin Goh (Mitch Goh)

camLine Pte Ltd

Waterplace Residence, Pakuwon Indah Lontar, Timur 3-5, Tokan B 08, Surabaya

Legal representatives: Sien Chang

camLine Sdn Bhd

2-3-3A One Square, Tingkat Mahsuri, 11950 Bayan Lepas, Penang, Malaysia

Legal representatives: Danny Yeoh Soon Kwang



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2. How can you contact the data protection officer?

You can contact our data protection officer at:

Data protection officer

camLine

Industriering 4a

85238 Petershausen

privacy@camline.com



3. Which of your personal data do we use?

We process your personal data as our business partner, i.e. as party with whom we have an active business relationship or with whom we are in the process of initiating business. In addition, we also process your personal data to fulfil legal obligations, support legitimate interests or on the basis of a consent provided by you.

Depending on the legal grounds for data processing, the following categories of personal data are concerned:

- First name, surname
- Address
- Company affiliation, function, sector
- Contact information (telephone, email address)
- Basic contract data, in particular the contract number, duration, notice period and type of contract
- Invoice data/sales data/VAT ID
- Information about creditworthiness
- Payment information/bank account details
- Account information, in particular registration and logins
- Videos or photographs

In the course of pre-contract negotiations, we also use data provided to us by third parties. Depending on the type of contract, this concerns the following categories of personal information:

- Information about creditworthiness (from credit rating agencies)
- Information about client companies (from sources accessible to the public)
- Contact and communications information for project team members involved in funding projects (e.g. EU sponsorship projects)



4. What sources does the data come from?

We process personal data that we receive from you when you use one or more of the following channels:

- in the context of business relationships
- as part of attending trade fairs or participating in events
- as part of the use via our homepage (www.camLine.com)

We also receive personal data from the following entities:

- Credit rating agencies (business registers, e.g. Schufa (a credit rating agency))
- Sources accessible to the public: commercial registers, register of associations, records of debtors, land registries



5. For what purposes do we process your data and on what legal basis?

We process your personal data in accordance with the General Data Protection Regulation (GDPR), the German Federal Data Protection Act (Bundesdatenschutzgesetz, BDSG) and all other relevant laws.

5.1 On the basis of a consent provided by you (Art. 6 (1) (a) GDPR)

If you have voluntarily provided your consent to the collection, processing or transmission of particular personal data, this consent forms the legal basis for processing this data.

We process your personal data on the basis of a consent provided by you in the following cases:

- Sending a newsletter email
- Pseudonymised newsletter tracking
- Market research (e.g. customer satisfaction surveys)
- Marketing and advertising to create customer profiles
- Publication of customer references (name, picture and video)

5.2 To perform a contract (Art.6 (1) (b) GDPR)

We use your personal data to carry out your customer order (e.g. purchase contract, service contract, etc.). Within this contractual relationship we process your data to carry out the following particular activities:

To make contact in relation to the contract, for contract management, to provide on-going customer support, to observe warranty claims, to manage receivables, to manage contract termination.

You can find further information about data processing purposes in the relevant contractual documents and the standard terms and conditions of business.

5.3 To fulfill legal obligations (Art. 6 (1) (c) GDPR) or in the public interest (Art. 6 (1) (e) GDPR)

As a company, we are subject to various legal obligations. It is sometimes necessary to process personal data to fulfill these obligations:

- Monitoring and notification obligations
- Verification of credit, age and identity
- For the prevention of/to defend against criminal actions



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5.4 On the basis of a legitimate interest (Art. 6 (1) (f) GDPR)

In particular cases we process your data to support our legitimate interests or the legitimate interests of a third party:

- Direct advertising, market research or opinion polls
- Customer data management
- Measures to secure buildings and facilities
- Video surveillance to maintain compliance with house rules
- Consultation of and exchanging information with credit rating agencies
- To establish creditworthiness or the risk of loss
- To guarantee IT security and IT operations



6. To whom is your data given?

To fulfill our contractual and statutory obligations, your personal data are disclosed to various public and internal entities, as well as to external service providers.

Companies within the group:

If you have made a contact request via our contact form, you have been informed of this at the appropriate point and have given your consent to the processing of your personal data, such as your name, email address or telephone number, within the Elisa group.

If you used our contact form to make a contact request, you were made aware of this at the relevant time and consented to the processing of the personal data provided by you (such as your name, email address and telephone number) within the Elisa group. The personal data we received in the contact form are used exclusively for the purpose of your contact request. They are not disclosed to third parties outside the Elisa group. An exception to this is the affiliate companies of the Elisa group.

Personal data that we have received from you in the context of an offer, the conclusion of a contract or a contract processing are only used for the purpose of contract processing, customer administration and customer care on the basis of a legitimate interest (Art. 6 Paragraph 1 f GDPR) in affiliates of the Elisa Group passed on.

External service providers:

We work together with selected external service providers (e.g. service providers for the destruction of files and data, telecommunications, payment service providers, contract negotiators, service providers for telephone support, (web) hosting providers, tax consultants, auditors, newsletter service providers) to fulfill our contractual and statutory obligations. To guarantee the security and confidentiality of your data, the service providers contracted by camLine are subject to a Data Processing Agreement in accordance with the provisions of the GDPR. In this way we ensure that your data is subject to confidentiality and will not be passed on to third parties.

Public entities:

We may also be obliged to disclose your personal data to other recipients, e.g. to authorities in order to fulfill statutory reporting obligations:

- Tax authorities
- Customs authorities
- Social insurance agencies

If you have any further questions relating to the individual recipients, please contact us at:
privacy@camline.com



7. Is your data transferred to countries outside the European Union (so-called “third countries”)?

Countries outside the European Union (and the European Economic Area “EEA”) deal with the protection of personal data differently to the countries within the European Union. To process your data, we also use service providers located outside the European Union. There is currently no decision by the EU Commission that these third countries generally provide a suitable level of protection.

We have therefore taken special measures to ensure that your data is processed as securely in the third countries as it is within the European Union. We enter standard data protection clauses (as provided by the European Commission) with service providers in third countries. These clauses provide appropriate guarantees for the protection of your data by service providers in third countries.

If you would like to view the existing guarantees you can contact us at privacy@camline.com.



8. For how long is my data saved?

We save your personal data for as long as is necessary to fulfill our statutory and contractual obligations.

If your data is no longer required for the fulfillment of contractual or statutory obligations then it will be deleted, unless further processing of the data is necessary for the following purposes:

- To fulfill an obligation to retain it pursuant to commercial and tax laws. As a rule, the retention period pursuant to the German Commercial Code (Handelsgesetzbuch (HGB)) is 10 years.
- To preserve evidence for the statutory periods of limitation. The German Civil Code (Bürgerliches Gesetzbuch (BGB)) prescribes limitation periods of up to 30 years in some cases. The usual limitation period is three years.



9. What rights do you have in connection with the processing of your data?

Every data subject has a right to information pursuant to Art. 15 GDPR, a right to correction pursuant to Art. 16 GDPR, a right to deletion pursuant to Art. 17 GDPR, a right to restrict processing pursuant to Art. 18 GDPR, a right to object pursuant to Art. 21 GDPR and a right to have data transferred under Art. 20 GDPR. The right to information and deletion are subject to the restrictions contained in §§ 34 and 35 of the German Data Protection Act.

9.1 Right of objection

You can object to the use of your data for commercial purposes at any time without incurring any costs other than transmission costs in accordance with the basic tariffs.

9.1.1 What rights do you have in the event that processing is based on a legitimate or public interest?

Pursuant to Art. 21 (1) GDPR, you have the right to object to the processing of your personal data on the basis of Art 6 (1) (e) (data processing in the public interest) or Art. 6 (1) (f) (data processing to support a legitimate interest) for reasons relating to your particular situation at any time. This also applies to profiling carried out on the basis of this provision.

We will stop processing your personal data if you raise an objection, unless we can prove that there are compelling legitimate grounds for processing the data that outweigh your interests, rights and freedoms or unless processing serves the assertion, exercise or defense of legal rights.

9.1.2 What rights do you have if data is processed for the purpose of direct advertising?

If we process your data for the purpose of direct advertising, you have the right to object to your personal data being processed for the purpose of such advertising in accordance with Art. 21 (2) GDPR. This also applies to any profiling in connection with such direct advertising.

If you raise an objection, we will no longer process your personal data for this purpose.

9.2 Withdrawal of consent

You can withdraw your consent to the processing of personal data at any time. Please note that this withdrawal will only be effective for the future.



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9.3 Right to information

You can demand information about whether we have saved any of your personal data. If you wish, we will inform you what data we have, for what purposes it is processed, to whom it is disclosed, how long the data are saved for and what further rights you have in relation to this data.

9.4 Further rights

You also have the right to demand that inaccurate data is corrected and that your data is deleted. If there is no reason why your data should continue to be saved we will delete your data. Otherwise we will restrict its processing. You can also demand that all the personal data you have provided to us is given to you or to a person or company chosen by you in a structured, common and machine-readable format.

Furthermore, a right to complain to the responsible data protection supervisory authority exists (Art. 77 GDPR in conjunction with § 19 BDSG).

9.5 Exercising your rights

To exercise your rights, you can contact the data controller or data protection officer using the contact details provided above.

We will deal with your requests promptly in accordance with the statutory provisions and inform you what measures we have taken.



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10. Is there an obligation to provide your personal data?

In order to enter into a business relationship, you need to provide those personal data that are necessary for the contract to be performed or which we are compelled to collect on the basis of legal requirements. If you do not provide us with this data, it is not possible for us to perform the contract.



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11. Changes to this information

If the purpose or the manner in which your data is processed materially changes we will update this information and inform you about the changes in good time.