

Privacy Notice for Customers and Business Partners

The following sets out information pursuant to Articles 13 and 14 of the General Data Protection Regulation (GDPR) on the processing of your data in connection with your business relationship with our company:

Who is responsible for the data processing?

The controller within the meaning of data protection law is

Trasco Bremen GmbH
Zum Panrepel 24
28307 Bremen

Further information and contact details can be found on our website in the [Impressum](#).

Where did we obtain your data and which data do we use?

We process personal data of contact persons at our customers, prospective customers, suppliers, OEM partners and other business partners, in particular:

- Contact and communication data (e.g. form of address, name, position/function, company/authority, postal address, telephone number, email address)
- Contract and quotation data including personal details of contact persons (e.g. quotations, contracts, project data)
- Project, complaint and service data with a personal reference (e.g. responsibilities, communication histories, service histories)
- Billing and payment data with a personal reference (e.g. invoice information, bank and payment details, open items)
- Identification and screening data in the context of sanctions list, export control or customs checks (e.g. matching data, screening results, documentation of approvals)
- Log and metadata from IT and communication systems (e.g. email logs, CRM/ERP logs, telephone connection data, IT log data)

As a rule, we receive the data:

- directly from you or from your employer (e.g. through requests for quotation, orders, contract documents, emails, telephone calls, meetings)
- from joint projects with OEM partners or other cooperation partners who provide us with your contact details
- from publicly accessible sources in a B2B context (e.g. company websites, registers, directories, trade fair contacts)
- from external sanctions list and compliance tools as well as public lists issued by authorities (e.g. EU, UN) for export control and compliance checks

For what purposes do we process your data (purpose of processing) and on what legal basis?

We process personal data of customers, prospective customers, suppliers and other business partners in particular for the following purposes:

- initiation, conclusion and performance of contracts and projects (e.g. preparation of quotations, order processing, project management)
- maintaining the business relationship and supporting customers/suppliers (e.g. CRM, service, complaint handling)
- fulfilment of legal obligations (e.g. retention obligations under commercial and tax law, foreign trade and export control law, customs requirements)
- carrying out sanctions list, export control and compliance checks
- direct marketing in the B2B sector (e.g. newsletters, information on products, services and events, where permitted)
- ensuring IT and information security as well as documenting business processes

The processing is based in particular on the following legal grounds:

- Art. 6(1) subpara. 1 lit. b) GDPR (performance of a contract and steps taken prior to entering into a contract) for data processing in the context of quotation processes, contract and project execution
- Art. 6(1) subpara. 1 lit. c) GDPR in conjunction with commercial, tax and foreign trade law provisions (e.g. Section 257 German Commercial Code, Section 147 German Fiscal Code, Foreign Trade and Payments Act, Foreign Trade and Payments Ordinance, Union Customs Code and related regulations) for statutory documentation and retention obligations, customs clearance and export control requirements
- Art. 6(1) subpara. 1 lit. f) GDPR to safeguard our legitimate interests, in particular:
 - efficient organisation of our sales, project, service and purchasing processes
 - demonstrating compliance with legal obligations (e.g. documentation of contracts, checks and approvals)
 - ensuring network and information security
 - carrying out compliance and sanctions list checks
 - asserting, exercising or defending legal claims
- Art. 6(1) subpara. 1 lit. a) GDPR in conjunction with Art. 7 GDPR where we obtain your consent, e.g. for sending newsletters and other direct marketing, unless this is based on a legitimate interest in the B2B sector

Where legal bases are referred to in this notice, they apply to the processing of the personal data in their respective applicable version.

Automated decision-making within the meaning of Art. 22 GDPR does not take place. The matching procedures used in the course of sanctions list and export control checks serve preparatory purposes only. The final assessment and decision is always taken by a natural person.

To which recipients is the data disclosed?

Within our company, access to your data is granted to those units that require it for the initiation, performance and settlement of the respective business relationship and for the fulfilment of legal obligations (e.g. sales, project management, service, purchasing, accounting, management, IT). Possible further recipients are



- IT and cloud service providers (e.g. CRM/ERP/DMS/email/hosting providers)
- OEM partners and project partners in joint projects
- tax advisors, auditors, banks and insurance companies
- logistics and freight forwarding companies as well as customs brokers
- providers of sanctions list and screening tools or export control software
- public authorities, courts and other public bodies where we are obliged to do so (e.g. tax authorities, customs and export control authorities)

Where we engage service providers as processors, they are contractually obliged pursuant to Art. 28 GDPR to process your data only in accordance with our instructions and subject to appropriate technical and organisational measures.

In the context of email communication, your personal data is processed primarily in data centres within the European Union by Microsoft Corporation acting as a processor. A transfer of personal data to a third country, in particular to the USA, may take place in individual cases, for example in the context of support or security measures.

Where a transfer to the USA takes place, it is carried out on the basis of the EU-US Data Privacy Framework pursuant to Art. 45 GDPR. Microsoft Corporation is self-certified under the EU-US Data Privacy Framework and has undertaken to comply with the data protection principles set out therein. On this basis, such a data transfer is permissible under data protection law.

A transfer of personal data to recipients in countries outside the European Union (third countries) may additionally take place in the context of certain processing operations, e.g.:

- when using further cloud or communication services based in third countries, or group structures with access from third countries
- in the context of export and customs procedures involving authorities or partners in third countries

In these cases we ensure that either an adequacy decision of the EU Commission (e.g. the EU-US Data Privacy Framework) is in place, or that appropriate safeguards pursuant to Art. 46 GDPR (e.g. EU standard contractual clauses) are used, or that one of the derogations under Art. 49 GDPR applies.

How long is the data stored?

We generally store personal data of customers, prospective customers, suppliers and other business partners for the duration of the business relationship. In addition, the following principles apply:

- data on prospective customers and quotations is deleted or anonymised once there is no further contact or discernible interest, or at the latest 10 years after the last contact, unless longer statutory retention obligations apply
- customer master data, contract and project data is stored for the duration of the business relationship and, after it has ended, generally retained for 6 to 10 years in accordance with commercial and tax law requirements (e.g. Section 257 German Commercial Code, Section 147 German Fiscal Code). In the case of security-relevant projects or longer warranty and liability periods, longer retention may be necessary
- complaint and service data as well as customs and export-related documents are retained in accordance with the applicable statutory periods (e.g. 7–10 years under tax and customs law)

- records of sanctions list, export control and compliance checks are retained at least for the duration of the business relationship and for several years thereafter (typically 5–10 years), insofar as this is necessary to document compliance with legal obligations

Once the respective periods have expired, the data is deleted or anonymised, unless further purposes (e.g. asserting, exercising or defending legal claims) require longer storage.

Where is your data processed?

Your data is processed predominantly on IT systems within our company and in the systems of our IT and cloud service providers (e.g. CRM, ERP, DMS, email and collaboration systems). Only authorised persons have access to these systems on a need-to-know basis (e.g. sales, project management, service, purchasing, accounting, IT).

Your rights as a “data subject”

You have the right to obtain information about the personal data we process. In addition, you have the right to rectification, erasure or restriction of processing, insofar as this is provided for by law. You also have the right to data portability.

You may object to the processing of your data pursuant to Art. 21(1) GDPR on grounds relating to your particular situation, insofar as the processing is based on Art. 6(1) subpara. 1 lit. f) GDPR.

Right to object to direct marketing

You have the right to object at any time and without giving reasons to the processing of your personal data for the purposes of direct marketing (Art. 21(2) GDPR). If you object to processing for direct marketing purposes, we will no longer process your personal data for these purposes. You can send your objection informally to datenschutz@trasco-bremen.de.

You may withdraw any consent given at any time with effect for the future. The lawfulness of the processing carried out up to the withdrawal remains unaffected.

To exercise your rights, you may contact us at any time using the contact details stated in the Impressum or contact our data protection officer.

The provision of your data is necessary for the initiation, conclusion and performance of the business relationship. Without this data we cannot conclude or perform contracts and cannot carry out the legally required export, customs and sanctions list checks.

Right to lodge a complaint

You also have the right to lodge a complaint with a data protection supervisory authority if you consider that the processing of your personal data infringes data protection law. The authority responsible for us is the State Commissioner for Data Protection and Freedom of Information of Bremen (<https://www.datenschutz.bremen.de>).

**Our data protection officer**

You can reach our data protection officer using the contact details below, or by post at the above address of Trasco Bremen GmbH marked "Datenschutzbeauftragter"

Matthias Niehoff
Niehoff – Systemberatung
<https://niehoff-systemberatung.de>
Email: Datenschutz@trasco-bremen.de

Sergiy Lizun
Managing Director