

Privacy policy

Our handling of your data and your rights

- Information in accordance with Articles 13, 14 and 21 of the General Data Protection Regulation (GDPR) -

Dear customer,

The protection of your data is very important to us. In the following, we inform you about the processing of your personal data by us and the claims and rights to which you are entitled according to the data protection regulations.

Which data is processed in detail and how it is used depends largely on the requested or agreed services.

1. Who is responsible for data processing and whom can I contact?

Responsible body is:

ADT Project Consulting GmbH
Adenauerallee 176
53113 Bonn
Phone: +49-228-9144730
Fax: +49-228-9144731
E-mail address: adtproject@adt.de

You can reach our data protection officer at:

Frick Data Security
Christian Frick
An der Gonzenburg 5
34637 Schreckensbach
Tel +496698269014
mail@frick-data-security.de

2. What sources and data do we use?

We process personal data that we receive from you in the course of our business relationship. On the other hand, we process personal data that we have obtained from publicly accessible sources (e.g. press, media) and are permitted to process.

The following personal data are collected and processed:

Name, first name, address, telephone numbers, e-mail address, IP address of the computer as well as other data comparable to the above categories.

3 What do we process your data for (purpose of processing) and on what legal basis?

We process personal data in accordance with the provisions of the European Data Protection Regulation (DSGVO) and the Federal Data Protection Act (BDSG-neu).

3.1 For the fulfilment of contractual obligations (Article 6 para. 1b DSGVO)

The processing of personal data (Article 4 No. 2 DSGVO) is carried out in particular for the fulfilment of enquiries and the implementation of our contracts or pre-contractual measures with you, as well as all activities necessary with the operation and administration of an advisory company.

The purposes of data processing primarily depend on the specific service and may include, among other things, needs analyses, advice and support as well as the execution of transactions.

Further details on the purpose of data processing can be found in the respective contract documents and terms and conditions.

3.2 Within the framework of the balancing of interests (Article 6 (1f) DSGVO)

Where necessary, we process your data beyond the actual performance of the contract to protect the legitimate interests of us or third parties, such as in the following cases:

- Consultation of and data exchange with credit agencies (e.g. SCHUFA) to determine creditworthiness or default risks
- Testing and optimisation of procedures for needs analysis and direct customer approach;
- advertising or market and opinion research, insofar as you have not objected to the use of your data;
- Assertion of legal claims and defence in legal disputes;
- Ensuring the IT security and operation of the company;
- Prevention and investigation of criminal offences;
- Building and facility security measures (e.g. access controls);
- Measures to ensure the right of domicile;
- Measures for business management and further development of services and products.

3.3 Based on your consent (Article 6 (1a) DSGVO)

Insofar as you have given us consent to process personal data for certain purposes (e.g. sending newsletters), this processing is lawful on the basis of your consent. Consent given can be revoked at any time. Please note that the revocation only takes effect for the future. Processing that took place before the revocation is not affected.

3.4 Because of legal requirements (Article 6 (1c) DSGVO) or in the public interest (Article 6 (1e) DSGVO)

In addition, as a company we are subject to various legal obligations, i.e. legal requirements (e.g. tax laws). The purposes of the processing include, among others, *the* fulfilment of control and reporting obligations under tax law as well as the assessment and management of risks.

4. Who gets my data?

Within our company, those offices that need your data to fulfil our contractual and legal obligations receive access to it. Processors used by us (Article 28 DSGVO) may also receive data for these purposes. These are companies in the categories, IT services, logistics, printing services, telecommunications, debt collection, advice and consulting as well as sales and marketing.

Further data recipients may be those bodies for which you have given us your consent to transfer data or for which there is a legal obligation.

5. How long will my data be stored?

Insofar as necessary, we process and store your personal data for the duration of our business relationship, which also includes, for example, the initiation and execution of a contract.

In addition, we are subject to various storage and documentation obligations, which result, among other things, from the German Commercial Code (HGB) and the German Fiscal Code (AO). The retention and documentation periods specified there are two to ten years.

Finally, the storage period is also assessed according to the statutory limitation periods, which, for example, according to §§ 195 et seq. of the German Civil Code (BGB), are usually three years, but in certain cases can be up to thirty years.

6. Is data transferred to a third country or to an international organisation?

No data is transferred to third countries (countries outside the European Economic Area - EEA) or only if this is necessary for the execution of orders, is required by law or you have given us your consent. We will inform you separately about the details, if required by law).

7. What data protection rights do I have?

Every data subject has the right to **information** under Article 15 of the GDPR, the right to **rectification under** Article 16 of the GDPR, the right to **erasure under Article** 17 of the GDPR, the right to **restriction of processing under Article** 18 of the GDPR and the right to **data portability under** Article 20 of the GDPR. With regard to the right to information and the right to erasure, the restrictions pursuant to

Sections 34 and 35 BDSG apply. In addition, there is a right of appeal to a data protection supervisory authority (Article 77 DSGVO in conjunction with Section 19 BDSG).

8. is there an obligation to provide data?

Within the scope of our business relationship, you only have to provide those personal data that are necessary for the establishment, execution and termination of a business relationship or that we are legally obliged to collect. Without this data, we will usually have to refuse to conclude the contract or execute the order or will no longer be able to perform an existing contract and may have to terminate it.

9. to what extent is there automated decision-making in individual cases?

As a matter of principle, we do not use fully automated decision-making pursuant to Article 22 DSGVO to establish and implement the business relationship. Should we use these procedures in individual cases, we will inform you of this separately, insofar as this is required by law.

Information about your right to object in accordance with Article 21 of the General Data Protection Regulation (GDPR)

You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data relating to you which is carried out on the basis of Article 6(1e) DSGVO (data processing in the public interest) and Article 6(1f) DSGVO (data processing on the basis of a balance of interests); this also applies to profiling based on this provision within the meaning of Article 4 No. 4 DSGVO which we use for credit assessment or advertising purposes.

If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

In individual cases, we process your personal data in order to carry out direct advertising. You have the right to object at any time to the processing of personal data concerning you for the purpose of such advertising; this also applies to profiling insofar as it is associated with such direct advertising.

If you object to processing for direct marketing purposes, we will no longer process your personal data for these purposes.

The objection can be made without formalities and should preferably be addressed to:

ADT Project Consulting GmbH
Adenauerallee 176
53113 Bonn
adtproject@adt.de