

# Data Privacy Statements of GEZE Benelux B.V. | last updated June 2020

Thank you for visiting GEZE websites (hereinafter referred to as 'websites' or 'sites') and your interest in GEZE GmbH and our products. The services offered through our websites are designed to ensure that the information and content regarding GEZE that is delivered to you is of interest to you consequently, we need to collect and utilize your data to a certain extent in order to optimize our offerings and ensure that the aforementioned objective is met.

We take the protection of your privacy and your private data very seriously. Therefore, we will provide you with comprehensive information here so that you can feel comfortable when you visit our website, and so that you know that we take your privacy into consideration even when processing personal data. We treat data that is collected when you visit our website as confidential at all times and handle it in compliance with the valid data protection regulations. The protection of your personal data is one of our central objectives. Data privacy and information security are an integral part of our company policy.

The processing of data obtained from visits to the GEZE website is carried out centrally in Germany. The GEZE GmbH in Leonberg is responsible for this. An exception to this is the processing of data within the contact forms, in which case the GEZE Benelux B.V. (hereinafter referred to as 'GEZE Benelux') remains responsible.

# 1 CONDITIONS OF USE OF THE WEBSITES OF GEZE 1.1 Exclusion of liability

The details and pieces of information that appear on our websites have been carefully checked and researched by GEZE GmbH. We strive to keep expanding and updating this pool of information. However, GEZE GmbH is unable to assume any liability, guarantee or responsibility for correctness, completeness and topicality. This also applies to internet sites to which this website makes direct or indirect references. Our privacy policy does not apply to websites of other providers, even if our website links to these. Therefore, please note the specific privacy policies of the corresponding website providers when you leave our website. GEZE GmbH reserves the right to make changes or additions to the provided information without making any prior announcements regarding the same.

#### 1.2 Copyrights and protective rights

The contents and layouts of these websites are protected by copyright. The websites or their contents may be reproduced only with prior written consent from GEZE GmbH. This condition does not apply to press releases that appear in the 'Company' and 'Press' sections, and which serve to facilitate general and customary press work. Links directing towards the sites of <u>www.geze.de/.com</u> as well as GEZE GmbH websites, may be set. The following section contains information regarding the specific personal data that we collect when you use our websites or their services and functions, how we process said data, and for what purposes. GEZE GmbH, Reinhold-Vöster-Str. 21-29 in 71229 Leonberg, Germany (hereinafter referred to as 'we') is responsible for the operations in which these websites are used to collect and utilize data.

# 2 IN CASE OF VISITS TO GEZE WEBSITES

When you visit our websites, we automatically save certain pieces of data about your usage, such as the IP (Internet Protocol) address that was assigned to you by your internet service provider, and the date, duration and path of your visit. Information regarding the type of browser that you used to visit us is also collected and saved, along with information regarding the websites that you visited and the respective date and time. This is done anonymously.

We retain this information for a maximum period of four weeks for purposes related to the detection and tracking of misuse. If necessary, we use anonymous usage information to structure our website in a need-based manner, and to solve technical problems. Additional usage analysis operations pertaining to this data are only carried out as described in point 7. Furthermore, we delete or anonymize the usage data (including your IP address) after a period of four weeks; as soon as the said data is no longer necessary for the aforementioned purposes.

# **3 WHAT IS PERSONAL DATA?**

"Personal data" refers to all particulars about the personal or material circumstances of a specific or identifiable person. For example: name, address, e-mail address, etc.

# **4 COLLECTION AND PROCESSING OF PERSONAL DATA**

Beyond the processing described in section 2, personal data will be saved only if you actively and voluntarily share it with us and provide explicit consent for it to be used, for example in the context of a registration, survey, newsletter, competition/ contest, etc., or where you contact us in some other way, e.g. via e-mail or an online form. For example, if you register for the newsletter your personal profile will consist of information you provide voluntarily. To the extent that we obtain consent from the person in question for processing operations involving personal data, article 6 section 1 lit. a of the EU General Data Protection Regulation (GDPR) shall serve as the legal basis. The other legal bases of article 6 shall apply depending on the appropriation. Furthermore, we also store anonymized information regarding your usage behavior in order to improve our services. Other evaluations are also carried out in an anonymized form (user and click behavior).

# **5 DISCLOSURE OF PERSONAL DATA AND EARMARKING**

We shall use your personal data for the purpose of the technical administration of our website, for customer management, for our own surveys and for marketing, to the necessary extent. Our employees and external service providers/data processors which are entrusted with the processing of your data shall, of course, be bound by us to confidentiality, the currently-applicable EU – GDPR and the corresponding new Federal Data Protection Act (BDSG). We will not forward your data to third parties outside GEZE Benelux without your consent. However, this does not apply to situations involving point 8 ('Transfer of data'), or situations in which personal data is transferred to state institutions and authorities on the basis of mandatory national legislation.

If you have already given your consent in advance, we shall also use the data to advertise our own products and services/data processors, and/or to conduct market and attitude research. We may also need to forward your data to certified external service providers in order to process orders, but only where this is permissible under the applicable provisions of data protection legislation. GEZE GmbH always obliges its service providers to comply with the applicable data protection regulations (currently EU – GDPR and BDSG). Your data will not be sold to third parties or marketed in any other way. You may withdraw your consent for the use of your personal data for purposes related to advertising or the improvement of our services and/or website at any time via e-mail, fax or by sending a letter to our head office in Leonberg. Your personal data will then immediately be rendered unusable.

# 6 COOKIES

GEZE uses so-called "cookies" when you visit certain areas of our websites. These cookies enable us to customize our services to you. Cookies are small text files that a web server can send to your computer in order to identify it. Since they are stored on your hard drive, they make it possible to simplify navigation and ensure that the websites are more user-friendly.

We use such cookies in order to recognize the preferences of visitors, be able to design the web pages optimally, and identify particularly popular areas of our website. This makes it possible for us to tailor our website more specifically to the needs of users and improve our offer for you. We also use cookies to establish whether you have visited out web pages from your device in the past, whereby only the cookie stored on your device is identified.

Personal data can be saved in cookies if you have actively entered this. For example, this is the case in the event of a password protected online access, in which your user ID and the password are automatically retained. You can also use our websites without cookies or object to their use, or delete cookies that have already been set. This is done using your browser settings, in which you can refuse to accept cookies, or delete cookies. You can also completely deactivate the cookie function in your internet browser. Approval of cookies is not absolutely necessary in terms of the navigation and functionality of the website. Instructions for allowing, rejecting, viewing and deleting cookies can be found in your internet browser's help function. Please note that, in this case, some functions of the website may no longer be available. If links lead you to third-party websites, you should be mindful of the fact that the data privacy statements of the third parties in question shall apply.



# 7 GOOGLE ANALYTICS

We use Google Analytics, a web analysis service of Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; hereinafter referred to as "Google") on the various websites of GEZE GmbH. Google Analytics uses so-called 'cookies' (as described in point 6), i.e. text files that are stored on your computer, and which make it possible to analyze your use of the website. The information about your use of this website which is generated by the cookie is usually transferred to a Google server in the USA, where it is stored. However, the so-called IP anonymization facility has been activated on our website. This means that Google shall shorten your IP address beforehand, and this shall be done within member states of the European Union or other signatories to the treaty on the European Economic Area. Only in exceptional cases (servers not located in a European Union member state or outside of the contracting states to the convention or the European Economic Area) is the full IP address transmitted to a server in the USA and shortened there. On our instructions, Google shall use this information to analyze your use of the website, compile reports regarding website activities and provide us with other services associated with the use of the website and the internet. The IP address transmitted by your browser within the framework of Google Analytics operations shall not be combined with other Google data. By using GEZE websites, you are agreeing to the processing of the data collected about you by Google in the manner described above and for the aforementioned purpose.

If you do not want us to collect and analyze information about your visit, you can opt out at any time with future effect. You can stop cookies from being saved via your browser software settings; please note, however, that this may limit your use of all the functions of this website. Downloading the browser add-on for deactivating Google Analytics, which is available via the following link, prevents Google from collecting and processing the data (including your IP address) that is generated by the cookie and which relates to your use of our website: https://tools.google.com/dlpage/gaoptout. Please note that this browser add-on can be used only on one specific device. If you delete cookies or use another device or another browser, you will have to re-download and re-execute the browser add-on.

# **8 TRANSFER OF DATA**

Information that we collect and use with regard to your use of this website may also be processed by other companies, such as external service providers and/or other companies that are part of GEZE GmbH and GEZE Benelux, however only to the extent necessary for the purposes specified in this data protection declaration, or to the extent that the other company is bound by its instructions as a service provider/data processor. If and when data is forwarded in such a manner, we shall use contractual agreements pertaining to the protection of your personal rights (which could, for example, arise as a result of contract clauses) to ensure that protection that is sufficient in terms of the legal data protection regulations is guaranteed.

#### **9 CONSENTS PERTAINING TO RECEIPT OF ADVERTISEMENTS**

When using the various services associated with our websites, you have the option of consenting to us sending you advertising. If you have given such consent, we will use the information you have provided to send you advertising either by post, or via any other communication channels you have selected (e-mail, telephone, agreed personal appointments). You may revoke such consent at any time with future effect. In case you want to opt out of one (or more) of our services, this can be done at any time through <u>unsubscribe@geze.com</u>. If you receive an e-mail from us, you can opt out of the particular service at any time by using the "Unsubscribe" button at the bottom of the e-mail. You can choose from the following services (as of April 2019):

#### 9.1 Subscriptions to newsletters and other mailings

You can use our websites to sign up for and subscribe to our monthly newsletter or other communications that are sent via e-mail. We collect your name and e-mail address and use the said data to e-mail you the newsletter or, as the case may be, the other communications that you have subscribed to. We use the so-called 'double opt-in procedure' to verify your willingness to receive our newsletter or other communications via e-mail. This means that we first send an e-mail to the e-mail address that you specified during the subscription procedure in order to request you to actively confirm your willingness to receive the newsletter or other communication; this is done before we start sending the respective items. The information regarding this confirmation is used to document and (if necessary) verify your consent. Your willingness to receive the newsletter or other associated utilization of your personal data can be revoked for the future at any time.

### 9.2 Invitations to events (print and e-mail)

You can use our websites to log your interest in invitations to GEZE events. If we have received your consent for this (see double-opt-in procedure in previous point), we will send you invitations to events by post or electronic mail, such as trade fair dates or architectural events, etc. Your consent to receive the newsletter or other notifications and for the associated use of your personal data may be revoked at any time with future effect.

#### 9.3 Discount campaigns, customer campaigns and contests

Discount campaigns, customer campaigns and/or contests are offered through our websites from time to time. The details pertaining to the specific campaigns shall be disclosed on the company's websites in a timely manner, communicated through our social media channels and/or sent via e-mail through the monthly newsletter. If you wish to participate in such schemes, we shall request you to provide your name and contact details (e.g. name, address, e-mail address etc.), along with any other information that might be necessary for you to be able to participate in the contest (e.g. answers to prize questions, photos of you or other people, proofs of purchase etc.). We shall only use such information to execute the specific campaign in question; your data shall then be rendered unusable. More detailed information can also be found in the participation conditions for the specific campaign. If you have given your consent within the framework of your participation, we shall also have the option of using the information for the purposes specified in the declaration of consent (e.g. if you wish to sign up for the monthly newsletter within the framework of the contest). If a prize is acquired as the result of a violation of the conditions of use or other manipulative actions on the part of a user, GEZE GmbH shall be entitled to revoke the prize; this can also be done at a subsequent stage. If the prize has already been handed over, the winner shall be obligated to return it in the same condition. As a matter of principle, winners are notified via an e-mail from GEZE GmbH and GEZE Benelux.

GEZE reserves the right, over the course of its communications, to compile additional textual, visual and auditory information regarding the prizes and winners; it also reserves the right to publish the said information, provided that the specific winners have given their consent for such publication. As a matter of principle, prizes cannot be handed over in the form of cash. The judges' decision is final. GEZE also reserves the right to modify announced or ongoing campaigns, prizes and contents; this can also be done on short notice. In such cases, the users shall be informed accordingly. The availabilities of the prizes shall be explicitly specified within the framework of the specific campaign (e.g. while stocks last).

# 9.4 Contact forms

Our website offers different forms that you can use to contact us, in order to, for example, ask questions about the product promoted on the websites or request (product) information. We shall only use the data provided by you (e.g. name, address, telephone number, e-mail address etc.) in order to be able to process and answer your question.

#### 9.5 Collection of personal data through social media channels

GEZE GmbH and its different subsidiaries have a presence on various social media channels, and they also occasionally use these channels to offer various campaigns such as competitions. The participation conditions of the specific campaign shall apply. If a user wins a prize, he or she shall, within the framework of the specific social media channels in question, be approached through his user name and notified about his or her win. This communication shall be accompanied by a request to transfer his or her personal data to GEZE GmbH for the sole purpose of facilitating the handover of the prize. The data that has been received through the social media channels is only used within the framework of the said channels, and is not handed over to third parties.

GEZE Group currently has a presence on Facebook ("@GEZE.Group"), Twitter ("GEZE\_ GmbH" and "GEZE\_Int"), LinkedIn ("GEZE GmbH", "GEZE Benelux", "GEZE South Africa", "GEZE France", "GEZE Italia", "GEZE Scandinavia", "GEZE India Pvt Ltd"), various Instagram campaign profiles like "GEZE ActiveStop" from GEZE Benelux and Xing ("GEZE GmbH"). You are solely responsible for the protection of your privacy, data and settings. The data privacy statements of <u>Facebook</u>, Twitter, LinkedIn and Xing apply. Apart from this, GEZE GmbH also operates its own channel ('GEZE GmbH', hereinafter referred to as 'channel') on the YouTube video platform. GEZE GmbH', hereinafter referred to as 'channel') on the YouTube video platform. GEZE GmbH as geDW channel. GEZE GmbH assumes no liability for GEZE products that are shown and/or used in other videos that have not been produced by us. YouTube users have sole responsibility for videos that they upload to a/their channel . The respective users are also solely responsible for any and all comments, images and



opinions that appear in the comments field. Where content is inappropriate (for example glorification of violence, SPAM etc.), GEZE GmbH reserves the right to delete the respective comments and/or images. Here too, you have sole responsibility for the protection of your privacy, data and settings In such a case, the <u>conditions of use</u> and data privacy statements of <u>YouTube</u> or <u>Google</u> shall apply.

GEZE GmbH is able to evaluate personal data using personalized Facebook Insights data. These Insights are analyzed regularly to improve the efficiency of and optimize our Facebook page. We (the "controller") are responsible alongside Facebook for processing Facebook Insights data. GEZE GmbH does not transmit these Insights to third parties, except for to service providers with which we collaborate in the social media area. With respect to Facebook Ireland Limited ("Facebook Ireland"), Facebook Ireland is solely responsible for processing the Insights data; we accept no liability for such processing. You can read the Facebook Page Insights supplementary agreement here: https://www.facebook.com/legal/terms/page\_controller\_addendum

# 10 ADDITIONAL USAGE OF PERSONAL DATA 10.1 For applicants to GEZE Benelux

GEZE uses personal data in a variety of ways. For example, the formulation of the contact form can vary and/or be presented for a specific purpose depending on the campaign. You alone shall decide upon the purpose for which you give us your consent. You can opt out of any and all services at any time.

You can send applications for open positions to us through our <u>Careers page</u>, either by e-mail or using our online application portal. We process the data you send to us along with your application to evaluate your suitability for the advertised positions (or any other open positions at GEZE) and carry out the application process. After your application is received, your applicant data is inspected in house by the HR department and our department managers. Within the company, only individuals who require access to your data to carry out the application process receive such access.

The legal basis for processing your personal data in an application process is Sec. 26 BDSG, in particular. According to this Section, data may be processed if necessary in conjunction with a decision regarding the initiation of an employment relationship. Any additional information provided voluntarily by you is saved on the basis of Art. 6 para. 1 lit. f) GDPR, since we have a legitimate interest in processing additional information process.

1. The following are processed and saved to fill positions within the application process: \*First name

- \*Last name
- \*E-mail address

 $^{\ast}\mbox{The personal details that you have provided in the application documents and the subsequent process$ 

2. So-called session cookies are saved to facilitate usage of the website (if the application is submitted online):

GEZE only uses "first party" cookies, which are required to ensure the function and security of the application and make user guidance easier for you. Personal data is neither recorded nor saved for this purpose. The cookies are deleted as soon as you log out or close the browser. You will not be able to use the application generator if you do not accept any cookies. In this event, you must submit you application via e-mail or post.

3. So-called \*log files are created to avoid duplicate applications:

GEZE stores internet protocol addresses (IP addresses) in the log files for a limited period where necessary for tracking purposes (to prevent double applications).

We compare personal data (name, date of birth, birthplace, nationality and voluntarily provided data) of those applicants we specifically intend to hire during the application process with names on sanctions lists, in particular the EU terror list according to the EU anti-terror ordinances. We do so first to prepare to conclude an employment agreement with those applicants, and secondly to fulfil a legal obligation (Art. 6 para. 1 lit. c) GDPR), since legal regulations prohibit providing financial benefits, including paying wages, to persons listed on such sanctions lists. Finally, this comparison with sanctions lists is also carried out on the basis of our legitimate interest in the sense of Art. 6 para. 1 lit. f) GDPR, namely to maintain our AEO certification.

If you agree that your personal data remain saved in our applicant pool after – unsuccessfully – completing the application process, the legal basis for the associated further processing is your consent in accordance with Art. 6 para. 1 lit. a) GDPR. You can revoke your consent any time with future effect in written form, without providing

grounds. Please send such revocations to GEZE GmbH HR department; Reinhold-Vöster-Straße 21-29 in D-71229 Leonberg, or via e-mail to <u>data-protection@geze.com</u>. We regularly delete the personal data of applicants if they are rejected after four months, or after six months at the latest. If you have agreed to the further processing of your personal data in our applicant pool, data will be deleted once it is no longer required for the purposes for which it was collected and processed, typically after 2 years from the time you were included in the applicant pool. If you are selected for a position during the application process, your data is included in our personnel management system and processed there insofar as it is necessary to initiate and carry out the employment relationship.

Further details regarding the selection procedure or the reimbursement of travel cost can be found on our Careers page. The data used therein shall be used only in the context of the application procedure and/or the reimbursement of travel costs (at your request).

## 10.2 Other uses and deletion of data

As a matter of principle, your personal data shall only be processed and used in a further-reaching manner if a legal regulation permits such a course of action, or if you have given your consent for the said processing or usage of the data. Unless explicitly mentioned in the previous section, we shall not forward your personal data to third parties. However, we reserve the right to forward the data to instruction-bound service providers/data processors. In general, we delete or anonymize your personal data as soon as we reach a situation in which the said data is no longer necessary for the purposes for which we have used it (as described in the previous section). This has no effect on statutory provisions related to the retention and deletion of personal data for a longer period of time (as described above).

# **11 SUPPLEMENTARY DATA PRIVACY STATEMENTS**

Certain offers appearing on our websites require a registration. The specified data is saved by us (until revocation) for the purpose of managing your registration. This does not apply to campaigns such as competitions, however, where point 9.3 applies. GEZE GmbH and GEZE Benelux hereby undertakes not to transmit the saved data to third parties, except for in the cases described in point 10.2. Other users cannot view the e-mail address that you have provided. Where applicable, you can also use our websites to register with and log in to a password-protected domain (e.g. a retailer portal, Media Pool, etc.). Data collection and data usage in this regard are subject to specific data privacy statements or the respective portal, which are available in the specific login-protected domain in question. Additional usage instructions for GEZE Media Pool can be found in the General Terms and Conditions of our online portals.

Your personal data is also retrieved if you sign up for one and/or more of our GEZE training programmes and seminars. In such a case, you must first use your data to register with us. Once again, other users will not be able to view your data. Your registration data allows you to sign up for our various seminars. Under such circumstances, your personal data shall only be used with regard to GEZE seminars and training programmes; it shall not be used for advertising. This means that the said data shall be used for your participation in the seminar/training programme, confirmations, reminders associated with certificate extensions etc. Your personal data can be de-registered at any time via post, telephone or e-mail.

The same conditions apply to GEZE customer portal and GEZE supplier portal. You are responsible for your login details, as well as for the contents uploaded by you (e.g. comments or images). We reserve the right to promptly block content that violates the prevailing law, as well as offensive content. GEZE GmbH and GEZE Benelux may exclude users who violate the conditions of use from further participation and/or campaigns.

#### **12 SAFETY**

GEZE has implemented various organizational and technical security measures to protect all the managed data (including the information that you have stored with us) from manipulation, loss, destruction and access by unauthorized persons. Our security measures are always up-to-date, and we are continuously working on further technological developments in order to protect your data as well as possible.



# **13 CHILDREN**

Children should not send us any personal data unless their parents or legal guardians have approved of such a course of action. We would therefore like to clearly emphasize that children's online activities should always be supervised by their legal guardians. We do not request personal data from children.

## **14 RIGHTS OF DATA SUBJECTS**

14.1 Your rights as a data subject

As a data subject whose data we process, you have the following rights:

- ightarrow The right to information according to Art. 15 GDPR
- $\rightarrow$  The right to rectification according to Art. 16 GDPR
- $\rightarrow$  The right to deletion ("right to be forgotten") according to Art. 17 GDPR
- ightarrow The right to restrict processing according to Art. 18 GDPR
- → The right to transmit your data in a structured, commonly used and machinereadable format according to Art. 20 GDPR
- ightarrow The right to submit complaints to a supervisory authority according to Art. 77 GDPR

#### 14.2 Contact address

Please address your claims or declarations to the following address: GEZE Benelux B.V. Hoofdvestiging Steenoven 36 5626 DK Eindhoven

or via e-mail to: data-protection@geze.com

#### 14.3 Complaints

If you believe the processing of your personal data by GEZE GmbH or GEZE Benelux violates statutory provisions, we would greatly appreciate notification of this via e-mail to <u>data-protection@geze.com</u>. In addition, you have the right to submit complaints to a responsible data privacy supervisory authority (Art. 77 GDPR).

#### 15 OBJECTION AND REVOCATION 15.1 Your right to object

If we process your personal data on the basis of our legitimate interest, you have the right to object to this processing. Furthermore, you have a right to object to any processing of data for the purpose of direct advertising. If you would like to exercise your right to object, a notification in text form is sufficient. You are also welcome to write to us, send a fax, or contact us by e-mail. Our contact information is provided under point 14.2 in these data privacy statements.

#### 15.2 Your right to revocation

If we carry out processing of your personal data for certain purposes based on your consent, you have the right to revoke that consent at any time according to Art.7 para. 3 GDPR. After receiving your revocation, we will cease data processing for the purposes for which you granted us the consent. The legality of processing carried out before your consent was received shall remain unaffected.

### 16 AMENDMENTS AND UPDATES TO GEZE DATA PRIVACY STATEMENTS

Further technological development of the website can also affect the handling of personal data. We therefore reserve the right to amend this GEZE Data Privacy Declaration in the context of the applicable data protection laws, and (if necessary) to adapt it to changed data processing realities. We therefore recommend you to visit our website from time to time, in order to familiarize yourself with any potential updates pertaining to this matter.

If GEZE GmbH and/or GEZE Benelux launches new products or services or changes the respective internet procedure, or if the security technology pertaining to the internet and EDP evolves, these GEZE Benelux data privacy statements will be updated. We shall always publish the latest version at this location. This means, however, that any consent that you have previously granted will not automatically extend to potentially different purposes, and we will require you to give your explicit consent again. You can use our data protection form to request a complete disclosure of data; such a disclosure shall contain information regarding how GEZE saves and uses your data internally. Please note that we cannot process enquiries that are not accompanied by a copy of your proof of identity.

### GEZE GmbH

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