



DATA PRIVACY DECLARATION PAPIER UNION GROUP



Information on data protection in the companies of the Inapa Deutschland GmbH

(Papier Union GmbH, Complott Papier Union GmbH, Inapa Packaging GmbH).



Data Protection Declaration

We attach great importance to compliance with data protection regulations. Therefore we inform you below according to the legal regulations, in particular the GDPR (General Data Protection Regulation) about the processing of your personal data

- I. when visiting our website or our web shop and using the functionalities offered there
- II. in the establishment, execution and termination of a contractual relationship with you as a sole trader.
- III. in the establishment, execution and termination of a contractual relationship with your employer as our contractual partner.

Responsible in the sense of the data protection laws:

Papier Union GmbH
Osterbekstraße 90 a
D-22083 Hamburg Germany
datenschutz@papierunion.de
www.papierunion.de
www.e-papierunion.de

I.

Collection of general information when you visit our website

When you access our website, information of a general nature is automatically collected. This information (server log files) includes the type of web browser, the operating system used, the domain name of your Internet service provider and similar information. This is exclusively information which does not allow any conclusions to be drawn about your person. This information is technically necessary in order to correctly deliver the content you have requested from websites and is mandatory when using the Internet. Anonymous information of this kind is statistically evaluated by us in order to optimize our Internet presence and the technology behind it.

Cookies

Like many other websites, we also use so-called "cookies". Cookies are small text files that are transferred from a website server to your hard drive. This automatically provides us with certain data such as IP address, browser used, operating system via your computer and your connection to the Internet. Cookies cannot be used to start programs or to transmit viruses to a computer. Based on the information contained in cookies, we can make navigation easier for you and enable the correct display of our web pages. Under no circumstances will the data we collect be passed on to third parties or linked to personal data without your consent. Of course, you can also view our website without cookies. Internet browsers are regularly set to accept cookies. You can deactivate the use of cookies at any time via the settings of your browser. Please use the help functions of your Internet browser to find out how you can change these settings. Please note that some functions of our website may not work if you have deactivated the use of cookies.

Registration on our website

When registering to use our personalised services, some personal data is collected, such as name, address, contact and communication data such as telephone number and e-mail address. If you are registered with us, you can access content and services that we only offer to registered users. Registered users also have the option of changing or deleting the data provided during registration at any time if required. Of course, we will also provide you with information about the personal data we have stored about you at any time. We will be happy to correct or delete them at your request, provided that there are no legal storage obligations to the contrary. To contact us in this context, please use the contact details given at the end of this data protection declaration.

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Provision of chargeable services

We are asked for additional data on the provision of chargeable services, e.g. payment details.

SSL encoding

To protect the security of your data during transmission, we use state-of-the-art encryption methods (e.g. SSL) via HTTPS.

Newsletter

When registering to receive our newsletter, the data you provide will be used exclusively for this purpose. Subscribers may also be notified by e-mail of circumstances relevant to the service or registration (e.g. changes to the newsletter offer or technical circumstances). For an effective registration we need a valid e-mail address. In order to verify that a registration is actually made by the owner of an e-mail address, we use the "double opt-in" procedure. For this purpose we log the order of the newsletter, the sending of a confirmation e-mail and the receipt of the requested answer. Further data will not be collected. The data will be used exclusively for sending the newsletter and will not be passed on to third parties. You can revoke your consent to the storage of your personal data and their use for the newsletter dispatch at any time. In each newsletter you will find a corresponding link. You can also unsubscribe directly from this website at any time or inform us of your request by using the contact option at the end of this data protection notice.

Contact form

If you contact us by e-mail or contact form, the information you provide there will be stored for the purpose of processing the enquiry and for possible follow-up questions.

Deletion or blocking of data

We adhere to the principles of data avoidance and data economy. We therefore only store your personal data for as long as is necessary to achieve the purposes stated here or as provided for by law. After the respective purpose or expiry of these periods, the corresponding data will be blocked or deleted routinely and in accordance with legal regulations.

Only for our webshop e-papierunion.de: Use of Google Analytics

Our webshop uses Google Analytics, a web analysis service of **Google Inc.** (following: Google). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how users use the site. The information generated by the cookie about your use of this website is usually transferred to a Google server in the USA and stored there. However, due to the activation of IP anonymisation on these websites, your IP address will previously be reduced by Google within member states of the European Union or in other signatory states to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. We have commissioned Google to use this information for the purpose of evaluating your use of the website, compiling reports on website activity and providing us with other services relating to website activity and internet usage, which serve to improve our range of goods and services. The IP address transmitted by your browser in the context of Google Analytics is not merged with other Google data.

You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. You can also prevent Google from collecting the data generated by the cookie and relating to your use of the website (including your IP address) and from processing this data by Google by downloading and installing the browser plug-in available under the following link: [Browser add-on to disable Google Analytics](#).

In addition or as an alternative to the browser add-on, you can prevent tracking by Google Analytics on our pages by clicking this link. An opt-out cookie is installed on your device. This will prevent Google Analytics from collecting data for this website and for this browser in future as long as the cookie remains installed in your browser.

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II. + III.

Use of your data to establish, implement and terminate a contractual relationship (Art. 6 para. 1 letter b GDPR) or in our legitimate interest (Art. 6 para. 1 letter f GDPR)

In order to conclude, execute or terminate a contract with you or your employer, we also process personal data, in particular

- Your name,
- Your business address,
- Your business contact data such as function/position, telephone number and e-mail address.

Furthermore, we collect from our contractual partners for the purpose of establishing, implementing and terminating the contractual relationship

- your bank details

If we have not received the above data from you, we obtain it from publicly available sources. We do not sell personal data to third parties, nor do we market them in any other way. Your personal data will be processed in accordance with the applicable data protection regulations.

Provisions on credit information (legitimate interest - Art. 6 para. 1 lit. f GDPR)

When establishing a contractual relationship, we carry out the following checks on our contractual partners under certain conditions:

- Determining whether the establishment of the business relationship violates the EU sanctions lists under EU Regulations 2580/2001 and 881/2002. This determination is required by law and without this determination, we may not provide any services to you;
- Your creditworthiness.

Before concluding the contract, we obtain information on creditworthiness relevant characteristics of credit agencies for the credit assessment. The credit agencies are currently the following companies: **CreditSafe Deutschland GmbH; Creditreform Association, Hamburg; CrifBürgerl GmbH, Munich**. In certain constellations it is possible to include other or further credit agencies, which we can inform you of on request.

Before granting trade credits, we obtain information on credit-relevant features from credit insurers. Currently this is **Atradius Kreditversicherung, Cologne**.

We may conclude a contract with you or reject it if the information provided by the credit agencies or the credit insurer reveals negative characteristics about you that are relevant to your creditworthiness.

Information on creditworthiness or credit-relevant characteristics can be hard negative characteristics (insolvency, affidavit, arrest warrant), soft negative characteristics about non-contractual conduct on your part (e.g. non-payment of claims in the cases referred to in Section 31 (2) BDSG (Bundesdatenschutzgesetz neu) and probability values for assessing the credit risk (so-called scoring). The credit agencies or insurance companies store data that they receive from banks or companies, for example. This data includes surname, first name, date of birth, address as well as information on outstanding debts and non-contractual behaviour. The credit agencies make this data available to their partner companies so that they can check their creditworthiness. Credit insurers make them the basis of your insurance commitment. The transfer of data from credit agencies depends on the existence of a legitimate interest of the partner. A legitimate interest can be, for example, a planned contractual relationship. If you wish to receive information on the data stored by you, you can obtain this directly from the credit agencies or the credit insurer.

Observation of insolvency proceedings (legitimate interest - Art. 6 para. 1 lit. f GDPR)

To avoid bad debt losses, we are observing the opening of insolvency proceedings.

Duration of data storage

For employees of our contractual partners: The personal data provided by your employer will be stored and used by us in a database for as long as the business relationship exists between us and your employer.

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With our contractual partners: After termination of the contractual relationship, the data relevant to this contractual relationship is stored for the duration of statutory retention obligations and deleted after expiry of the period. Exceptions are personal data provided by you, which we store in a data bank and use for the purpose of placing possible further orders with us until you or we are no longer interested in a further business relationship. You inform us if there is no longer any interest in a further business relationship with us.

Recipients and categories of recipients

If necessary, we pass on personal data to companies in our Group or to external service providers (e.g. for invoicing, logistics services and IT services) within the scope of order processing. Other recipients of your data may be public authorities due to legal regulations (e.g. social insurance carriers, tax authorities, customs, police, public prosecutors, supervisory authorities).

Data transfers to third countries

Data transfers to countries where an adequate level of data protection does not exist ("third countries") take place within the framework of the administration, development and operation of IT systems and only to the extent that a) the transfer is in principle permissible and b) the special conditions for a transfer to a third country exist, in particular the data importer guarantees an adequate level of data protection in accordance with the EU standard contractual clauses for the transfer of personal data to data processors in third countries. The EU standard contractual clauses are available at the following link: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:039:0005:0018:EN:PDF>. Furthermore, data transfers to data processors in the USA only take place if they are registered in accordance with the "Privacy Shield" agreement. You can find the rules here: <https://www.privacyshield.gov/EU-US-Framework>

Your rights

You have the right to object to the advertising or other use of your data at any time, insofar as this use of this data is based on Art. 6 Para. 1 lit. f GDPR (to protect the legitimate interest of the person responsible). A simple message to us is sufficient for this. Furthermore, you may at any time request information from us about the data stored about you, the correction of such data in the event of errors or, if the data is no longer required, the deletion or restriction of the processing of your data.

You have the right to receive your data in a structured, common, machine-readable and interoperable form and to transmit it to another person in charge if you have provided the data with your consent or if processing is necessary to fulfil a contract. This does not apply if we process the data because we are legally obliged to process them. Upon your request, we will also transfer your data to a third party or other company named by you.

To do this, please contact our

Data Protection Officer

Mr. Wolfgang Mengel
Da.S Consulting
Email: w.mengel@das-beratung.de
Phone: 040 -761 01 907
Beerentalweg 76
D-21077 Hamburg

In addition, you can contact the local supervisory authority responsible for you or our company at any time with a complaint of your choice.

The Hamburg Commissioner for Data Protection and Freedom of Information
Prof. Dr. Johannes Caspar
Klosterwall 6 (Block C)
D-20095 Hamburg Tel.: 040 / 428 54 - 4040
E-Mail: mailbox@datenschutz.hamburg.de

Changes to our data protection regulations

We reserve the right to occasionally adapt this data protection declaration so that it always complies with current legal requirements or to implement changes to our services in the data protection declaration, e.g. when introducing new services. The new data protection declaration will then apply for your next visit.