

**Our privacy statement
-not applicable to job applications-**

A. General Provisions

I. In the following, we provide information about the collection of personal data

- (a) when you visit and use our website for information purposes (Section B. below)
- (b) when you contact us by e-mail, telephone, post or fax.

In case (a), the server of our provider collects the technical data transmitted by the website visitor's device, in case (b) we collect and store data of the message sender and, at the same time, the personal (contact) data of the person working for the sender in the specific case (sender's employee).

II. Pursuant to Art. 4 of the GDPR [EU General Data Protection Regulation], personal data includes all information relating to a specific natural person that is suitable for identifying such person. This includes, among other things, first and last name, address, telephone number, e-mail address or IP address and any accompanying technical data. Corresponding data from commercial enterprises in the organisational form of a general partnership or limited partnership is also included here, but not the data from companies with their own legal personality (corporations [AG, SE, GmbH], cooperatives).

The contact data of the natural persons (employees) acting at the companies in the specific case, which are usually also disclosed, always constitute personal data (individual company e-mail address, employee name, individual telephone number and, if applicable, fax number). However, we do not store these data in a separate order structure that enables them to be retrieved (e.g. alphabetically ordered by name), but rather as associated ancillary data of the corresponding data record relating to the company, which in turn is managed and stored in a file collection alphabetically ordered by company name ("filing system" as defined in Art. 4 point 6 GDPR).

III. The controller responsible under data protection law (Art. 4 (7) GDPR) for the processing of personal data in the aforementioned contexts is:

Rickertsen Produktionsgesellschaft mbH,
Halskestraße 3, 21465 Reinbek, Germany,
Telephone: +49 (40) 727 607-0; Fax: +49 (40) 727 607-25
E-mail: service@rickertsen-hamburg.de,
legally represented by the (sole) Managing Director, Rolf Dietz

B. Collection of personal data when visiting our website

I. Even if our website is only used for information purposes, our provider's server regularly collects the data which the visitor's browser transmits to the server by means of server log files. This is a technically indispensable process for the requested screen contents of our website to be able to be displayed and technical stability and security to be ensured by the server (legal basis for data collection and processing: Article 6(1) sent. 1 point (f) GDPR; legal basis with regard to the purpose of data collection: Article 5(1) point (b) GDPR). The collected visitor data usually includes the following:

- domain from the log file of the visitor to our website;
- IP address of the visitor; this is stored for seven (7) days and then anonymised; for us as the provider's customer, the IP address can only be viewed in anonymised form from the time of collection;
- request line from the log file: content of the request (specific page of the website);
- date and time of the visit;
- access status/HTTP status code;
- volume of data requested and downloaded;
- Internet page from which the visitor came (e.g. Google etc.);
- browser type and version as well as operating system used by the visitor.

Due to the technically compelling necessity of collecting this data, the visitor of our website has no rights against this, in particular no right of objection.

II. Use of cookies and analysis tools: When visiting and using our website, no cookies or analysis tools are used to register and monitor visitor behaviour.

III. Storage duration: After the end of your visit to our website, the data listed above under I. will be stored by our provider's server for purposes of preservation of evidence; the data will be erased six (6) months after storage, unless there are compelling legal reasons to the contrary.

C. Collection of personal data when contacting us for business purposes
-with the exception of job applications-

I. If we are contacted for business purposes (by e-mail, telephone, fax or post), the sending party will usually disclose the following data which we will collect and store:

- company name, first and last name of the employee acting in the specific case
- address and telephone and fax numbers of the company
- individual e-mail address of the acting employee
- individual telephone and fax number of the acting employee
- if applicable, tax data and bank details of the company.

Almost without exception, the business contact partners of our company are commercial enterprises with their own legal personality (AG, SE, GmbH, cooperative), which is why their data is not relevant in terms of data protection when it is transmitted to us. Although the employee data included in the data transmission in each case are personal data, we do not store them separately and in a structured manner in a separate filing system, as explained above in the second paragraph of Section A. II., but as ancillary data with a respective allocation to the company data.

The explanations given below from point II. of this section C. therefore only apply in the special case that, in the context of business contact activities with us, data of the external enterprise organised as a partnership or of the specific company employee involved are stored in a structured manner in a filing system.

II.1 Purpose and legal basis of the data processing: As a general rule, we collect and store the data for the preparation, implementation or handling of business transactions between the contact partner and us. The legal basis for data processing is Art. 6(1) sent. 1 point (b) GDPR, Art. 6(1) sent. 1 point (f) GDPR with regard to existing legitimate interests on our part where they are not overridden by third-party interests; if consent is given, the additional legal basis for data processing is Art. 6(1) sent. 1 point (a) GDPR. Consent to the collection and processing of data is given with each individual communication process from the contact partner to us with regard to all personal data and data relevant under data protection law collected in the process.

II.2 Storage period: Stored data will be erased as soon as it is no longer required for the purpose of its processing. Irrespective of this, a longer storage period applies if this is stipulated by statutory provisions, in particular provisions of commercial or tax law according to HGB (*Handelsgesetzbuch* – German Commercial Code) and AO (*Abgabenordnung* – German Tax Code). If such storage obligations exist, we will erase the data only at the end of the longest applicable period of time, but will block them as soon as their operational necessity no longer applies.

II.3 Rights of data subjects: Data subjects [i.e. persons from whom we process personal data concerning them] have the following rights vis-à-vis us:

- right to information about the data subject's personal data stored by us (Art. 15(1) GDPR);
- right to withdraw at any time any consent given under Art. 6(1) sent. 1 point (a) GDPR;
- right to rectification of inaccurate personal data of the data subject stored by us, if and to the extent that the conditions of Art. 16 GDPR are met;
- right to erasure of personal data of the data subject stored with us, provided that the request for erasure is justified by one of the grounds defined in Art. 17(1) GDPR;
- right to restrict the processing (blocking) of personal data of the data subject collected and processed by us, provided that one of the legal grounds described in Art. 18(1) GDPR applies;
- subject to the requirements of Art. 21 GDPR: right to object to the processing of personal data of the data subject after withdrawal of consent previously given pursuant to Art. 6(1) sent. 1 point (a) GDPR;
- right to data portability subject to the requirements of Art. 20(1) GDPR and in the forms and procedures provided therein.

Data subjects also have the right to lodge a complaint with a data protection supervisory authority about the processing of their personal data by us.

II.4 Transfer of data to third parties: We only pass on personal data to third parties where

- a)** we have been given express prior consent from the data subject(s) (Art. 6(1) sent. 1 point (a) GDPR),
- b)** this is legally permissible and necessary for the performance of a contract to which the data subject(s) is/are party or in order to take steps at the request of the data subject(s) prior to entering into a contract (Art. 6(1) sent. 1 point (b) GDPR),
- c)** the transfer of data is necessary for compliance with a legal obligation under objective law to which we are subject (Art. 6(1) sent. 1 point (c) GDPR),
- d)** we are required by law to transfer data to public bodies such as tax authorities, regulatory authorities, law enforcement agencies,
- e)** the transfer is necessary to safeguard legitimate corporate interests and to assert, exercise or defend legal claims, and there is no reason to assume that the data subject has an overriding interest worthy of protection in the data not being transferred (Art. 6(1) sent. 1 point (f) GDPR)
- f)** or if, in accordance with Art. 28 GDPR, we assign certain processing activities in the context of data processing to a so-called processor as an external service provider who has been obliged by us to handle the data of the data subject(s) with care and to maintain confidentiality and who is regularly monitored by us for compliance with these requirements.

We practice the **transfer of data** to logistics companies which transport goods produced by us for customers to these customers according to our instructions on our behalf, if necessary after intermediate storage at the logistics company, and which must receive the necessary customer and goods data (customer name and address, contact data; logistics goods data) required for the fulfilment of their order.

Furthermore, **data is disclosed** to a company that provides comprehensive technical support and maintenance of our operational IT system on a contractually regulated basis. This necessarily includes, among other things, data processing activities. For this reason, an additional contract for order processing under data protection law has been concluded with this company in accordance with Art. 28 GDPR as an accompanying basis for cooperation. This contract contains and complies with all the requirements of Art. 28 GDPR. Compliance with these requirements is monitored by us. The company in question is Hermann Pfanner Getränke GesmbH, A-6923 Lauterach, with which we are affiliated within the meaning of § 15 of the German Stock Corporation Act (*Aktiengesetz*) and which operates in the manner described on a group-wide basis.

We do not practice and do not intend to transfer data to third parties in countries outside the EU.

II.5 Data Security: We protect data transmitted to us and processed by us against manipulation and unauthorised access by technical and organisational measures. When messages are sent electronically, we protect the contents by means of state-of-the-art encryption to the extent that the transmission is under our responsibility and control.