

PRIVACY POLICY FOR CUSTOMERS

This privacy policy applies to our business customers or the designated contact persons of our business customers.

Who we are:

- Landbell Aktiengesellschaft für Rückhol-Systeme, Rheinstraße 4 L, 55116 Mainz
- Landbell Gesellschaft für nachhaltige Kreislaufwirtschaft mbH, Rheinstraße 4 L, 55116 Mainz
- DS – Entsorgungs- und Dienstleistungs-GmbH, Rheinstraße 4 L, 55116 Mainz
- Green Alley Investment GmbH, Rheinstraße 4 L, 55116 Mainz
- Click & Comply GmbH, Rheinstraße 4 L, 55116 Mainz
- Topengi Deutschland GmbH, Rheinstraße 4 L, 55116 Mainz
- European Recycling Platform (ERP) Deutschland GmbH, Charlottenburger Allee 41, 52068 Aachen

The companies mentioned above belong to the Landbell Group.

This privacy policy explains how the companies of the Landbell Group ("we", "our" or "us") process the personal data of their business customers.

In individual cases, we will provide you with additional information when collecting your personal data, if we consider this to be helpful or necessary.

Which personal data are collected by us

In relation to our activities for you or your company, the following types of personal data are processed by us to the extent that this is required/permitted by the (locally) applicable legal regulations:

- **Contact and Identification Information:** such as your name, preferred language, address, telephone number, email address, and business contact information (telephone number, email address, and physical address).
- **Data (if applicable) on your use of IT tools:** Computer and connection data, including statistical data regarding the use of our platforms, referral URL, IP address, unique device ID and web protocol data. When you visit our website, a separate privacy policy applies, which you can access directly on our website.
- **Other information that you send us (including in the course of your correspondence with us):** such as signatures, photographs, expressions of opinion and other personal data provided by you.

Why we collect, use and store this personal data

- We collect, use and store your personal data on the basis of Art. 6 (1b), (1c) and, if applicable, (1f) GDPR: **To the extent that this is necessary to administer the Service Agreement or in connection with the services we provide to you or your business.**
- **To the extent that this is necessary to comply with a legal requirement.**
- **To the extent that this is necessary to protect our legitimate interests, provided that your interests do not take precedence over our interests.**
 - Protection of our legitimate business interests and statutory rights: This includes, but is not limited to, the use of personal data in connection with legal claims, compliance, regulatory, auditing or investigative and other ethical and compliance-related reporting and disclosure obligations.
 - Ensuring the security and integrity of our facilities, equipment and electronic platforms: This includes **managing access rights, monitoring compliance with IT security protocols** and related investigations, to the extent permitted by local legislation and relevant regulations.
 - Sending newsletters to the email address you provide to us in connection with the sale of services or products for similar products or services you have purchased from us (you can also unsubscribe from these newsletters at any time using the link in each newsletter).

The processing of the data takes place within the EU. We do not carry out any automated decision making or profiling.

How long is your data stored?

Like all other companies governed by private law, we must comply with various data retention requirements. This includes above all the storage periods according to the German Fiscal Code, e.g. for delivery notes, damage reports, liability records, invoices and balance sheets. In addition, for security reasons, we store customer data for each platform in different ways from 30 to 180 days after the end of the contractual period.

How we transmit your personal data

We use and process your personal data only within the **Landbell Group**.

In addition, your personal data will be exchanged, to the extent necessary in each specific case (in accordance with the need-to-know principle), **with companies that provide services for us and are bound by the provisions of the GDPR (Art. 28) or other legal provisions on data protection**, such as subcontractors, auditors or consultants, as well as with help desk providers and providers of IT hosting and/or IT maintenance services or companies that monitor our IT tools or are involved in the maintenance or development of our IT tools.

How do we protect your data?

We take appropriate technical and organizational measures to ensure the security of the personal data processed by us. The data is diligently protected against loss, destruction, falsification, manipulation and unauthorized access or unauthorized disclosure. Our employees and partners are obliged to maintain data protection and to treat personal data confidentially and are informed about how they are treated. The security of the IT systems used is regularly monitored.

Your rights

You have the right of **information** (Art. 15 GDPR), **correction, deletion or restriction regarding the processing of your personal data** (Art. 16-18 GDPR) by us. You further have the right to be provided with your personal data, which you have made available to us within the framework of a contract with you or your company or with your consent, in a structured, machine-readable format or to request the transmission of this data to another responsible party (Art. 20 GDPR).

Under certain circumstances (if we do not (have to) process the data in order to fulfil a contractual or legal obligation, if we process your data on the basis of our legitimate interests or if we use the data for direct marketing), **you can object to the processing of your personal data** (Art. 21 GDPR).

If we process your data based on **your consent**, you can **revoke this consent at any time**. If you revoke your consent, this revocation of consent does not affect the processing that has taken place up to that point in time.

These rights may be limited, for example, if the fulfillment of your rights would result in the disclosure of personal information about another person or if you request us to delete information or data that we are required to retain by law or by compelling legitimate interests.

To exercise any of the above rights, you may contact us as indicated below. When contacting us, we will always ask you to provide your name, address and/or e-mail address, as well as precise information on the applications/rights/wishes you are claiming.

How to contact us and your rights of complaint

If you have any questions about this privacy policy or if you wish to contact us for any reason in connection with our processing of your personal data, please send an e-mail to our data protection officer at dataprivacy@landbellgroup.com. If you have any concerns about our processing of your personal data, you have the right to complain to the data protection authority (in the country) of your usual place of residence, your place of work or the place where the alleged violation occurred (Art. 77 GDPR). The data protection supervisory authority responsible for us is: Der Landesbeauftragte für den Datenschutz und die Informationsfreiheit Rheinland-Pfalz, Hintere Bleiche 34, 55116 Mainz, www.datenschutz.rlp.de.

It may be necessary to adapt and modify the content of this privacy policy from time to time. We therefore reserve the right to amend this privacy policy.