

## Data Protection Declaration

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It is basically possible to use our internet pages without providing any personal data. However, if a data subject wishes to make use of our company's special services via our website, for example to order goods, it may be necessary to process personal data.

The processing of personal data of a data subject, is always carried out in accordance with the Basic Data Protection Ordinance and in compliance with the country-specific data protection provisions applicable to Neosteel GmbH.

We as the controllers responsible for processing, have implemented numerous technical and organisational measures to ensure the most complete possible protection of your personal data. Nevertheless, Internet-based data transmissions can always have security gaps, so that absolute protection cannot be guaranteed.

### I. Definitions

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Our data protection declaration should be easy to read and understand for the public as well as for our customers and business partners. To ensure this, we would like to explain the terms used in advance.

We use the following terms among others in this privacy policy:

- 1)** „Personal data“ is any information relating to an identified or identifiable individual (hereinafter referred to as the "data subject"). An identifiable person is a natural person who can be identified directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, online identifier or to one or more specific characteristics which are expressions of the physical, physiological, genetic, genetic, psychological, economic, cultural or social identity of that natural person.
- 2)** „Processing“ is any operation or series of operations involving personal data, whether or not carried out by automated means, such as the collection, organisation, organization, sorting, storage, adaptation or modification, retrieval, use, disclosure by transmission, dissemination or any other form of provision, reconciliation or linkage, restriction, deletion or destruction.
- 3)** „Restriction of processing“ is the marking of stored personal data in order to limit their future processing.
- 4)** „Profiling“ is any kind of automated processing of personal data that consists in the use of this personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects of the natural person's work performance, economic situation, health, personal preferences, interests, reliability, behaviour, place of residence or relocation.
- 5)** „Pseudonymisation“ is the processing of personal data in such a way that the personal data can no longer be attributed to a specific data subject without further information, provided that such additional information is kept separately and that technical and organisational measures are taken to ensure that the personal data are not attributed to an identified or identifiable natural person.
- 6)** „Responsible or controller“ is the natural or legal person, public authority, body or other body which alone or jointly with others decides on the purposes and means of processing personal data. Where the purposes and means of such processing are prescribed by Union Law or by the law of the Member States, the person responsible may, or may, in accordance with Union Law or the law of the Member States, lay down the specific criteria for his designation.
- 7)** „Applicant“ is a natural or legal person, authority, institution or other body that processes personal data on behalf of the controller.

8) „Recipient“ is a natural or legal person, public authority, body or other body to whom personal data is disclosed, whether or not it is a third party. However, authorities which may receive personal data in the context of a specific task under Union Law or Member State law shall not be considered to be recipients.

9) „Third party“ is a natural or legal person, public authority, institution or other body other than the data subject, the data subject, the data processor and those authorised to process the personal data under the direct responsibility of the data subject or the data subject.

10) „Acceptance“ is any declaration or other unequivocal affirmative action by the person concerned that he or she agrees to the processing of personal data concerning him or her in an informed and unequivocal manner.

11) "Injury of protection of personal data" an injury of safety, which, whether unintentional or illegitimate, leads to the destruction, to the loss, to the change or to the unauthorized disclosure of or to the unauthorized access to personal data which were transmitted, saved or processed otherwise.

## II. Controller

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Responsible within the meaning of the Basic Data Protection Regulation, other data protection laws in force in the Member States of the European Union and other provisions of a data protection nature is the:

Neosteel GmbH, Gehlerter Weg 5, 57627 Hachenburg, Germany  
Managers: Astrid Mende, Dr. Reinhold Mende

Trade Register: 6 HRB 6298 Montabaur, Germany

Tel./Fax 0049-2662-5078528  
e-mail: [info@neosteel.de](mailto:info@neosteel.de)

Websites:

<http://www.neosteel.de>

<http://shop.neosteel.com>

## III. Cookies

The websites of Neosteel GmbH use cookies. Cookies are text files that are stored and stored on a computer system via an Internet browser.

Numerous websites and servers use cookies. Many cookies contain a so-called cookie ID. A cookie ID is a unique identifier of the cookie. It consists of a string of characters through which Internet pages and servers can be assigned to the specific Internet browser in which the cookie was stored. This enables the websites and servers visited to distinguish the individual browser of the person concerned from other Internet browsers that contain other cookies. A specific Internet browser can be recognized and identified by the unique cookie ID.

Through the use of cookies, Neosteel GmbH can provide users of this website with more user-friendly services that would not be possible without the use of cookies.

By means of a cookie, the information and offers on our website can be optimised for the user's benefit. Cookies enable us, as already mentioned, to recognize the users of our website. The purpose of this recognition is to make it easier for users to use our website. For example, the user of a website who uses cookies does not have to re-enter his or her access data each time he or she visits the website, as this is done by the website and the cookie stored on the user's computer system. Another

example is the cookie of a shopping cart in the online shop. The online shop uses a cookie to remember the items that a customer has placed in the virtual shopping cart.

The person concerned can prevent the setting of cookies by our website at any time by means of a corresponding setting of the Internet browser used and thus permanently object to the setting of cookies. Furthermore, cookies that have already been set can be deleted at any time via an Internet browser or other software programs. This is possible in all current Internet browsers. If the person concerned deactivates the setting of cookies in the Internet browser used, not all functions of our website may be fully usable under certain circumstances.

#### **IV. Collection of general data and information**

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The website of Neosteel GmbH collects a number of general data and information each time a person or an automated system accesses the website. These general data and information are stored in the log files of the server:

- browser types and versions used,
- the operating system used by the accessing system,
- the Internet page from which an accessing system reaches our Internet page (so-called referrer), - the subwebsites accessed via an accessing system on our Internet page,
- the date and time of access to the Internet page,
- your Internet protocol address (IP address),
- your Internet service provider's IP address, and other similar data and information which serve the danger defense in the case of attacks on our IT systems.

When using this general data and information, Neosteel GmbH does not draw any conclusions about the person concerned. Rather, this information is required in order to (1) deliver the content of our website correctly, (2) to optimize the content of our website and advertising, (3) to ensure the long-term functionality of our information technology systems and the technology of our website, and (4) to provide law enforcement agencies with the information necessary for prosecution in the event of a cyber attack.

At the use of these general data and information we don't draw any conclusions about the person concerned. We save the anonymous data of the server box files separated from all persons obtained data.

The anonymous data of the server log files are stored separately from all personal data provided by an affected person.

#### **V. Contact via the website**

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Due to legal regulations, the website of Neosteel GmbH contains information that enables us to contact our company electronically and to communicate directly with us quickly, which also includes a general address of the so-called electronic mail (e-mail address). If a data subject contacts the controller by e-mail or by means of a contact form, the personal data provided by the data subject will be automatically stored. Any personal data provided on a voluntary basis by a data subject to the controller will be stored for the purpose of processing or contacting the data subject. These personal data are not passed on to third parties.

#### **VI. Legal basis of the processing**

Provided that we obtain a consent from you for a definite processing purpose Article 6 I lit. a DS-GVO serves us as legal basis for the processing.

Provided that the processing of personal data is required for the fulfillment of a contract the processing is based on Article 6 I lit. b DS-GVO. This is also valid for processing purposes which are required for the execution of pre-contractual measures, for example when making an enquiry about our products or other performances.

Provided that we are subject to a legal obligation by which processing of personal data gets required such as for the fulfillment of tax duties legal basis is Article 6 I lit. c DS-GVO for the processing.

Provided that the processing of personal data gets required to protect essential interests of the person concerned or another individual person the processing would be based on Article 6 I lit. d DS-GVO.

Article 6 I lit. f DS-GVO can be legal basis for a processing finally. This is the case if the processing is included by none of the aforementioned legal bases and the processing for preservation if required by a justifiable interest of our enterprise or a third party as far as the interests, fundamental rights and fundamental liberties of the affected person don't predominate. Is the processing of personal data based on Article 6 I lit. f DS-GVO is our justifiable interest the execution of our business activity in favor of the welfare of our employees/shareholders

## VII. Legal or contractual regulations for provision of personal data

The provision of personal data is partly stipulated legally (e.g. tax regulations) and also can arise from contractual settlements (e.g. details on the contracting party). In the case that you want to enter a contract with us it is required that you provide personal data which are processed by us in the consequence. A not provision of the personal data would have the consequence that we would not enter a contract with you.

## VIII. Routine of deletion and blocking of personal data

The controller shall process and store personal data of the data subject only for the period of time necessary to achieve the storage purpose or as provided for by the European guideline and regulation giver or by another legislator in laws or regulations to which the controller is subject.

If the storage purpose ceases to apply or if a retention period prescribed by the European guideline and regulation provider or another competent legislator expires, the personal data will be blocked or deleted routinely and in accordance with the legal regulations.

After expiry of the respective legal retention time the corresponding provided data are deleted routinely if they aren't required to the performance of a contract or contract initiation any more.

## IX. Automated decision-making

We do without an automatic decision-making or a profiling.

## X. Rights of the data subject

### 1) Right of confirmation and information

Every data subject has the right granted to request confirmation from the controller whether or not personal data relating to him/her are being processed. If a data subject wishes to exercise this right of confirmation, he/she may at any time contact us.

Every person affected by the processing of personal data has the right, granted by the European guideline and regulation provider, to receive at any time from the controller free of charge information about the personal data relating to his person and a copy of this information. In addition, the European guideline and regulatory body has granted the data subject access to the following information:

- the processing purposes,
- the categories of personal data processed,
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations,

- if possible, the planned duration for which the personal data will be stored or, if this is not possible, the criteria for determining this duration,

- the existence of a right to rectify or delete personal data concerning him/her or to restrict the processing by the controller or to have a right of objection to such processing,

- the existence of a right of appeal to a supervisory authority,

- if the personal data are not collected from the person concerned: All available information about the origin of the data,

- the existence of automated decision-making, including profiling in accordance with Article 22 (1) and (4) DS-GVO (basic data protection regulation) and, at least in these cases, meaningful information on the logic involved and the scope and intended impact of such processing on the data subject.

Remember, the data subject has a right to know whether personal data have been transferred to a third country or to an international organisation. Where this is the case, the data subject shall otherwise be entitled to obtain information on the appropriate guarantees in connection with the transmission.

If a data subject wishes to exercise this right of access, he/she may contact us at any time.

## **2) Right of rectification**

Every person affected by the processing of personal data has the right, granted by the European guideline and regulatory body, to demand the immediate correction of inaccurate personal data concerning him/her. Furthermore, the data subject has the right to request that incomplete personal data be completed, including by means of a supplementary declaration, taking into account the purposes of processing.

If a data subject wishes to exercise this right of rectification, he/she may contact us at any time.

## **3) Right of deletion (right to be forgotten)**

Every person affected by the processing of personal data has the right, granted by the European guideline and regulation provider, to demand that the person responsible delete the personal data concerning him/her immediately, provided that one of the following reasons applies and insofar as the processing is not necessary:

- Personal data have been collected or otherwise processed for such purposes, for which they are no longer necessary,

- the data subject withdraws his or her consent, on which the processing is based pursuant to Article 6 (1)(a) DS-GVO or Article 9 (2)(a) DS-GVO, and there is no other legal basis for processing,

- the data subject submits an objection to the processing in accordance with Article 21 (1) DS-GVO and there are no primordial legitimate grounds for processing, or the data subject submits an objection to the processing in accordance with Article 21 (2) DS-GVO,

- personal data have been processed illegally,

- the deletion of personal data is necessary to fulfil a legal obligation under Union law or the law of the Member States to which the data controller is subject,

- personal data were collected in relation to the information society services offered in accordance with Art. 8 (1) DS-GVO.

If one of the above-mentioned reasons applies and a data subject wishes to have the personal data stored by Neosteel GmbH deleted, he/she can contact us at any time. Neosteel GmbH will ensure that the deletion request is promptly complied with.

If the personal data have been made public by Neosteel GmbH, our company is the person responsible pursuant to Art. 17 (1) DS-GVO is obliged to delete personal data, we shall take appropriate measures, taking into account the available technology and the implementation costs, including technical measures, to inform other data controllers who process the published personal data, that the data subject has requested the deletion of all links to or copies or replications of these personal data from these other data controllers, insofar as the deletion of all links to these personal data is obligatory, taking into account the available technology and implementation costs. We will make the necessary arrangements in individual cases.

#### **4) Right to restrict processing**

Every person affected by the processing of personal data has the right, granted by the European guideline and regulation provider, to require the data controller to restrict the processing if one of the following conditions is met:

- the accuracy of the personal data is denied by the person concerned for a period of time that allows the person responsible to verify the accuracy of the personal data,
- processing is unlawful, the person concerned refuses to delete personal data and instead demands that the use of personal data be restricted,
- we no longer need personal data for the purposes of processing, but the data subject needs it to assert, exercise or defend legal claims,
- the data subject has lodged an objection against the processing in accordance with Art. 21 (1) DS-GVO and it is not yet clear whether the legitimate grounds of us outweigh those of the data subject.

If one of the above conditions is met and a data subject wishes to request the restriction of personal data stored at Neosteel GmbH, he/she can contact us at any time. We will initiate the restriction of processing.

#### **5) Right to transfer data**

Every person affected by the processing of personal data shall have the right, granted by the European guideline and regulatory body, to receive personal data concerning him/her in a structured, established and machine-readable format. It also has the right to transfer these data to another controller without hindrance by us to whom the personal data have been made available, provided that the processing is based on consent in accordance with Art. 6 (1)(a) DS-GVO or Art. 9 (2)(a) DS-GVO or on a contract pursuant to 6 (1)(b) DS-GVO and the processing is carried out by means of automated procedures, provided that the processing is not necessary for the performance of a task which is in the public interest or in the exercise of official authority which has been delegated to us.

In the exercise of its right to transfer data pursuant to Art. 20 para. 1 of the EU-DSGVO the data subject has the right to obtain that the personal data be transferred directly from us to another person responsible, insofar as this is technically feasible and insofar as this does not affect the rights and freedoms of other persons.

In order to assert the right to transfer data, the data subject may at any time contact us.

#### **6) Right to revocation**

Any person affected by the processing of personal data shall have the right to object at any time to the processing of personal data relating to him/her on the basis of Article 6 (1)(e) or f DS-GVO, for reasons arising from his particular situation. This also applies to profiling based on these provisions.

We will no longer process personal data in the event of an objection, unless we can prove compelling grounds worthy of protection for processing that outweigh the interests, rights and freedoms of the data subject, or the processing serves to assert, exercise or defend legal claims.

If we process personal data in order to carry out direct advertising, the person concerned has the right to object at any time to the processing of personal data for the purpose of such advertising. This also applies to profiling insofar as it is associated with such direct advertising. If the data subject objects to the processing of personal data by us for direct advertising purposes, we will no longer process the personal data for these purposes.

In addition, the data subject has the right to object, for reasons arising from his particular situation, to the processing of personal data concerning him/her which is carried out at Neosteel GmbH for scientific or historical research purposes or for statistical purposes in accordance with Article 89 (1) DS-GVO, unless such processing is necessary for the fulfilment of a task in the public interest.

In order to exercise the right of objection, the data subject may us directly. The person concerned is also free to exercise his right of objection in connection with the use of information society services, notwithstanding Directive 2002/58/EC, by means of automated procedures using technical specifications.

### **7) Automated decisions in individual cases including profiling**

Every person concerned by the processing of personal data shall have the right, granted by the European guideline and regulatory body, not to be subject to a decision based solely on automated processing, including profiling, which has legal effect on him/her or similarly significantly impairs him/her, provided that the decision is not necessary for the conclusion or performance of a contract between the person concerned and the data controller, or by virtue of Union law.

If the decision is necessary for the conclusion or performance of a contract between the person concerned and us or is made with the express consent of the person concerned, we shall take appropriate measures to protect the rights and freedoms as well as the legitimate interests of the person concerned, for which purpose at least the right to have a person intervene on the part of the person responsible, to explain their own standpoint and to be informed of their own position.

If the data subject wishes to exercise his or her rights with regard to automated decisions, he or she may at any time contact us.

### **8) Right to revoke consent under data protection law**

Every person affected by the processing of personal data has the right to revoke consent to the processing of personal data at any time, granted by the European guideline and regulation provider. If the data subject wishes to exercise his or her right to revoke consent, he or she may at any time contact our data protection officer or another employee of the controller.

### **9) Right to complain with the supervisory authority**

You have the right to complain in accordance with Article 77 DS-GVO with the supervisory authority, if you consider that the processing of your personal data hasn't been carried out lawfully.

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## **XI. Website hosting**

Neosteel GmbH uses the web hosting provider *Konstantin Filtschew* to operate the above mentioned websites. A web hosting provider provides the technical infrastructure, such as servers, databases, web space, FTP access and the like, which are required to run a website. This means that personal data directly collected by us is stored in databases as described above, the infrastructure of which Konstantin Filtschew makes available to us.

The web hosting provider has its registered office in Germany with the address:

Konstantin Filtschew

Rudolf-Dietz-Str. 4,

65550 Limburg, Germany

Mobile: +49 177 / 675 10 53

Fax: +49 6431 / 479 42 08

e-mail: konstantin@filtschew.de

## **XII. Form data**

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The forms provided on the above-mentioned web pages use a secure transfer of data between the client (browser) and the server. Neosteel GmbH use the service provider Konstantin Filtschew to distribute the data by e-mail if necessary. He acts as an e-mail server and sends the data entered in the form by e-mail to the defined recipient addresses.

## **XIII. Third party payment services**

If you use the payment services of third parties (e.g. PayPal or money transfer to our bank account) for the payment of products you ordered at Neosteel GmbH, the conditions and the data protection regulations of the respective third parties are valid. These are available within the respective websites.

Last changes April 27, 2018

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