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	Data Privacy Notice (GDPR)			

Applicable for **clients** of the entities named under point 1 hereunder.

May, 2018

The following information provides our **clients** with an overview of **how we process your personal data** and **your rights** under data protection law. The **personal data** are **used to provide you** with services and products in the context of automated connection and electrification systems.

1. Who is responsible for the data processing and who can I contact in this regard?

For clients of Cavotec SA	For clients of Cavotec Sverige AB	For clients of Cavotec Nederland BV	For clients of Cavotec Norge AS
Via Balestra 27 6900 Lugano, CH	Fagerstagatan 5 16353 Spanga	Poppmolenlaan 13 3447 GK Woerden	Strandveien 6A 3050 Mjøndalen
For clients of Cavotec Germany GmbH	For clients of Cavotec RMS France SA	For clients of Cavotec Specimas Spa	For clients of Cavotec Iberica SL
Gottlieb Daimler Strasse 7 63128 Dietzenbach, DE	16 Avenue du Fief 95310 Saint Ouen L'aumone, FR	Via Agnesi 3 20834 Nova Milanese, IT	Muelle Poniente sn CN Alicante 3001 Alicante, ES
For clients of Cavotec Finland OY	For clients of Cavotec Danmark AS	For clients of Cavotec UK Limited	
Olarinluoma 14B 2200 Espoo (Helsinki), FI	Sivmosevaenget 2K 5260 Odense S Denmark	32 Jay Avenue, Teesside Industrial Estate, TS17 9LZ Stockton-on-Tees, UK	
You can reach our Data Protection Officer (DPO) at:			
Giorgio Lingardi Via Balestra 27 6900 Lugano, CH			

2. What sources and data do we use and for which purpose?

We process personal data which we receive from you or from your employer in the context of our business relationship.

To the extent necessary in order to provide our service, we also process **personal data** which we lawfully (e. g., for executing orders, performing contracts or on the basis of your consent) receive from other entities within the Cavotec Group or other third parties.

We also process **personal data** from publicly available sources (e. g., debtor directories, land registers, commercial registers and registers of associations, press, media, Internet) which we lawfully obtain and are permitted to process.

Relevant **personal data** collected and processed in the context of our business relationship may be:

- Example: Identification data (name, phone number, address.)

3. What is the legal basis?

We process the aforementioned personal data in compliance with the provisions of the EU General Data Protection Regulation (GDPR) and the other data protections laws.

a. for the performance of contractual obligations (article 6 (1) b) GDPR)

If you (as an individual) are the contracting party, the processing of personal data is carried out in order to take steps necessary for entering into a contract or for the performance of said contract. For further details on the purpose of the data processing, please refer to the respective contractual documentation and terms and conditions.

b. for the purposes of safeguarding legitimate interests (article 6 (1) f) GDPR)

Where necessary, we process your personal data in order to safeguard the legitimate interests pursued by us or by a third party. Examples:

- Security of /within our products and services

- Performance or conclusion of contracts we have entered with your employer/our clients (B2B contracts)
- Improvement and development of our products and services
- To conduct further and necessary due diligence on customers and potential customers

c. on the basis of your consent (article 6 (1) a) GDPR)

Insofar as you have granted us consent to the processing of personal data for specific purposes, the lawfulness of such processing is based on your consent. Any consent granted may be revoked at any time. This also applies to the revocation of declarations of consent that are granted to us prior to the entry into force of the EU General Data Protection Regulation, i. e., prior to 25 May 2018. Please be advised that the revocation shall only have effect for the future.

Any processing that was carried out prior to the revocation shall not be affected thereby. You can request a status overview of the consents you have granted from us at any time or view some of them. Example:

- Newsletter subscription (website) for targeted clients

d. for compliance with a legal obligation (article 6 (1) c) GDPR) or in the public interest (article 6 (1) e) GDPR)

As a provider of innovative connection solutions, we are also subject to various legal obligations, i. e., statutory requirements. Examples:

- Customs law / obligations
- Security obligations

4. Who receives my data?

Within and **outside** Cavotec SA, those recipient are given access to your data which require them in order to perform our **contractual** and **statutory obligations**. Moreover, those recipients may be

given access to your data which **require them for the purpose of our legitimate interest** according to the “need-to-know-principle”.

Within Cavotec SA it may be the following recipients:

- Accounting
- Operations
- Sales
- Marketing

Outside Cavotec SA it may be the following recipients:

- Customs authorities
- Tax authorities

5. Is data transferred to a third country or to an international organization?

Data will only be transferred to countries outside the EU or the EEA (so called third countries) if this is required for the **execution of your contract**, prescribed by law (e. g. tax law, customs law) or if you have given us your **consent**.

6. How long will my data be stored?

We process and store your personal data as long as it is necessary for the performance of our contractual and statutory obligations.

If the data are no longer required for the performance of our contractual and statutory obligations, they are regularly deleted, unless their further processing (for a limited time) is necessary for the following purposes:

- Compliance with records retention periods under commercial and tax law

7. What data protection rights do I have?

Every data subject has a right of **access** (article 15 GDPR) to the processed data, a right to **rectification** (article 16 GDPR) a right to **erasure** (article 17 GDPR), a right to **restriction** of processing (article 18 GDPR), a right to object (article 21 GDPR) and a right to data portability (article 20 GDPR).

Data subjects also have a right to lodge a complaint with a supervisory authority (article 77 GDPR).

Federal Data Protection and Information Commissioner Feldeggweg 1 CH-3003 Bern Phone: +41 (0)58 462 43 95

If data processing is based on your consent, you have the possibility to revoke this at any time. This includes also consent, which was granted before the coming in force of the GDPR on 25th of May 2018. However, revocation of the consent has no retroactive effect. Any personal data that was processed before the revocation is not concerned.

8. Am I under any obligation to provide data?

Within the scope of our **business relationship**, you must provide personal data **which is necessary for the initiation and execution of a business relationship** and the **performance of the associated contractual obligations** or which we are **legally obliged to collect**. As a rule, we would not be able

to enter into any contract or execute the order without these data or we may no longer be able to carry out an existing contract and would have to terminate it.

9. To what extent is automated decision making (including profiling) carried out?

As a rule, we do not make decisions based solely on automated processing as defined in article 22 GDPR to establish and implement the business relationship. Provided that this is prescribed by law, we will inform you separately about automated decision making.

10. Is “profiling” used?

In some cases, we process your data automatically with the aim of evaluating certain personal aspects (profiling). For instance, we use profiling in the following cases:

- To analyse the behaviour of individuals using our engineering solutions (human operator interface)

Information on your right to object under article 21 of the EU GDPR

Note: Information on your right to object under article 21 of the EU General Data Protection Regulation (GDPR)

1. Ad hoc right to object

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on article 6 (1) e) GDPR (processing in the public interest) and article 6 (1) f) GDPR (processing for the purposes of safeguarding legitimate interests); this includes any profiling based on those provisions within the meaning of article 4 (4) GDPR. If you lodge an objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or unless the processing is for the establishment, exercise or defense of legal claims.

2. Right to object to the processing of data for marketing purposes

In certain cases, we process your personal data for direct marketing purposes. You have the right to object at any time to processing of personal data concerning yourself for such marketing, which

includes profiling to the extent that it is related to such direct marketing. If you object to processing for direct marketing purposes, we will no longer process your personal data for such purposes.

There are no formal requirements for lodging an objection; where possible it should be made via email: giorgio.lingiardi@cavotec.com.