

Data protection information for customers and partners

- Information in accordance with Article 13 of the Basic Data Protection Regulation (GDPR) -

The following data protection information provides you with an overview of the collection, processing and use (hereinafter referred to as "processing") of personal data in the context of the business relationship with J. P. Sauer & Sohn Maschinenbau GmbH.

1 Who is responsible for data processing and whom can I contact?

This data protection information applies to the following companies, which jointly exercise their responsibility in accordance with Art. 26 EU GDPR and have regulated it in a group agreement.

1. Dieter Murmann Beteiligungsgesellschaft mbH (DMB), Kiel
2. J. P. Sauer und Sohn Beteiligungsgesellschaft mbH (SMB), Kiel
3. J. P. Sauer & Sohn Maschinenbau GmbH (SMG), Kiel

You can reach the persons responsible (hereinafter referred to as "the person responsible" or "we" or "us") as follows:

J. P. SAUER & SOHN MASCHINENBAU GMBH
Brauner Berg 15
24159 Kiel, Germany
Telephone: +49 (0) 431/39 40-0
Telefax: +49 (0) 431/39 40-24
Internet: www.sauercompressors.com
E-Mail: info@sauercompressors.de

1.1 Data protection officer

Our data protection officer can be contacted at the above postal address with the words "To the data protection officer or at the e-mail address datenschutz@sauercompressors.de.

2 Security and protection of personal data

We take the protection of personal data very seriously and regard it as our primary task to maintain the confidentiality of the personal data provided to us and to protect it from unauthorized access. We therefore apply the utmost care and the most modern security standards to ensure maximum protection of personal data.

As a company under private law, we are subject to the provisions of the European Data Protection Basic Regulation (GDPR) and the regulations of the Federal Data Protection Act (BDSG). We have taken technical and organisational measures to ensure that the regulations on data protection are observed both by us and by our external service providers. In any case, we process personal data in a manner appropriate to the purpose and limited to what is necessary for the purposes of processing (data minimization).

3 Data processing, purpose and legal basis

3.1 What are personal data and what data do we process?

According to Art. 4 No. 1 GDPR, personal data is any information relating to an identified or identifiable natural person (hereinafter referred to as "**data subject**").

For the purposes of this Privacy Notice, Data Subjects are our customers or potential customers (hereinafter collectively referred to as "**Customers**"), or employees, agents or

other contact persons (hereinafter collectively referred to as "**Contact Persons**") of the Customer.

Unless otherwise stated in this privacy policy, we process the following personal data of the persons concerned:

- Name, first name, title, form of address
- Company
- Company address
- Other information relevant to the identification of the customer or the installation site (e.g. name and hull-, IMO-number of the vessel).
- Internet address, homepage
- Customer number (assigned internally)
- business phone number(s)
- business e-mail address,
- Function, Department.

When you visit the company, we also record

- Date, time and reason for the visit
- If applicable, data on the procurement and provision of travel services and VISA
- Video data from video surveillance, if applicable

3.2 Where does the data come from and what data do we process?

We process personal data that our customers transmit or hand over to us. This takes place among other things through:

- Inquiries
- Placing of orders, orders
- Personal contact, e.g. at trade fairs
- Forwarding by sales partners
- Inquiries via our website
- Registration for the newsletter via our website
- Registration for other services (e.g. Plotchart app)
- Our visitor database
- Our video surveillance system

We store the data in our internal systems (including e-mail, ERP, CRM, DMS/Retrieval, Plotchart-app) and add further data for administration purposes, e.g. a unique customer number.

In addition, we process personal data which we take from publicly accessible sources (such as telephone directory, commercial register, website of our customer) as permitted.

3.3 For what purpose and on what legal basis is the data processing carried out?

3.3.1 Performance of a contract and implementation of pre-contractual measures

We process personal data of the persons concerned for the execution of our contracts with our customers, for the execution of our customers' orders, as well as for the implementation of measures and activities within the framework of pre-contractual relations. This includes in particular - insofar as necessary for the above-mentioned purposes - the identification of our customers; correspondence with our customers; contract administration; processing of inquiries and orders of our customers; dispatch of goods; invoicing and payment

management; preparation and execution of service assignments; processing of possible product liability or other claims of our customers.

The legal basis for data processing is Art. 6, Paragraph 1, Letter b, GDPR in the case of data subjects who are our customers. In the case of data subjects who are the customer's contact persons, the legal basis for data processing is Art. 6 para. 1 letter f GDPR. Our legitimate interest is to be able to communicate with our customers and to fulfil our contracts.

3.3.2 Contract and contact management

For the purposes of efficient contract and contact management, we collect and store contract and customer data in our CRM system and maintain a digital telephone directory in which we store the business telephone number of our customers or the contact person of our customers.

The legal basis for data processing is Art. 6 Para. 1 letter f GDPR. Our legitimate interest is to be able to communicate more efficiently with our customers and to fulfil our contracts more efficiently.

3.3.3 Marketing

We process personal data within the scope of sales and marketing activities in order to promote the economic success of our company and customer loyalty. This includes in particular the following activities:

- Evaluation and storage of contacts generated at trade fairs (leads) or via our website [link],
- Evaluation of contact data (leads) from our CRM system,
- Selection, organisation and other processing of contact data for the dispatch of advertising and information material (e.g. customer magazine and similar materials),
- Selection, organisation and other processing of contact data for sending invitations to trade fairs and events,
- Event management (organisation and implementation) and travel organisation (it may be necessary for us to request additional personal data from the participants (e.g. date of birth, nationality, possibly private address, passport number, etc.) and process this data for the purposes of travel organisation),
- Selection and other processing of contact data for the purpose of conducting customer satisfaction surveys, possibly by a commissioned agency.

The legal basis for data processing is in principle Art. 6 para. 1 lit. f GDPR. Our legitimate interest is to acquire new customers, market our products and promote customer loyalty.

In certain cases, however, data processing is only permitted with the consent of the data subjects (e.g. sending e-mail newsletters to potential customers, conducting customer satisfaction surveys). **In such cases, we obtain the explicit consent before interviewing the data subjects.** Insofar as the data subject has given us consent to process personal data for specific purposes, the processing is carried out on the basis of Art. 6 Para. 1 letter a GDPR. Data subjects have the right to revoke their consent at any time, even verbally, and without giving reasons. In order to exercise the right of revocation, data subjects may contact us or our data protection officer at the contact details given at the beginning of this data protection notice. The revocation does not affect the legality of the processing carried out on the basis of the consent up to a possible revocation.

3.3.4 Fulfilment of service contracts

For the fulfilment of service contracts, which are concluded and fulfilled depending on the operating time of compressors, we require operating data that are transmitted to us via e-

mail or online systems (e.g. Plotchart app). To authorise the transmission, we create a personal user account using your business contact details. We store the business data together with the personal user name in our service database.

The legal basis of the data processing is Art. 6 (1) lit. b DSGVO in the case of data subjects who are our customers. In the case of data subjects who are the customer's contact persons, the legal basis of the data processing is Art. 6 (1) lit. f DSGVO. Our legitimate interest is to protect our systems from unauthorised access as well as to communicate with our customers and to be able to fulfil our contracts.

3.3.5 Visitor management

For the planning and administration of visits to our company premises we operate a visitor management program (Lotus Notes database). When customers or contact persons visit us, the internal employee responsible for the visit enters their name and business contact details into the database. Central services and the central reception use the database to plan and manage the visit. The reason for the visit, the date and time of the visit, the internal person responsible for the visit, meeting rooms and hospitality are recorded. If necessary, the database is also used for the administration of travel resources, hotels, pick-up and delivery service, etc. Furthermore, the database is used to prove the access of external persons and to control the visits for the purpose of providing evidence in case of possible offences.

The legal basis for data processing is Art. 6 Para. 1 letter f GDPR. Our legitimate interest is to be able to plan and control the visits and to guarantee operational safety.

3.3.6 Security

To prevent and detect theft, provide evidence in the event of offences and for the protection and security of our company, our employees and visitors, we carry out video surveillance both outdoors and indoors. Those affected will be informed of this by means of an information sign upon entry.

3.3.7 Operation of the website

When visiting our website, personal data is processed in accordance with the website's data protection information (<https://www.sauercompressors.com/>).

3.3.8 Other purposes

It may happen that the processing of personal data is necessary to protect our other legitimate interests or the other legitimate interests of a third party (e.g. to assert legal claims or to defend in legal disputes). In such cases, we process the personal data of the persons concerned on the basis of Art. 6 para. 1 lit. f GDPR.

If the processing of personal data is necessary to fulfil a legal obligation to which we are subject, we process the personal data of the persons concerned on the basis of Art. 6 para. 1 lit. c GDPR.

3.4 How long will my data be stored?

As soon as the storage of personal data is no longer necessary to pursue the above-mentioned processing purposes and there are no statutory retention periods (e.g. from the German Commercial Code and the German Fiscal Code), the personal data will be deleted immediately, unless the person concerned has expressly consented to the further use of his or her data or we have no legitimate interest in storing the data (e.g. for purposes of defence in a court case).

As a rule, we delete the personal data - in the case of customers - 3 years after the end of the calendar year in which the customer relationship was terminated (i.e. the contract with the customer was terminated or the customer's contract was fulfilled). Due to legal retention

periods, we delete commercial letters (including e-mails) 6 years after the end of the calendar year in which the commercial letter was received or sent. We store booking vouchers until 10 years after the end of the calendar year in which the booking voucher was created.

4 Information disclosure

4.1 Data transfer within the Group

Within the Sauer Compressors Group, the personal data of the persons concerned is forwarded on the basis of our legitimate interest (Art. 6 Para. 1 lit. f GDPR) for the purposes of

- Contact and processing of inquiries in new sales and service
- Execution of service orders in case of need
- Preparation and execution of marketing activities

The transfer and processing of data are regulated in a mutual contract.

4.2 Transfer of data to processors

In some cases, we use external service providers (so-called contract processors) to process personal data. These are carefully selected and commissioned by us in accordance with the requirements of Art. 28 GDPR; they are bound by our instructions and are regularly checked. These are companies in the following areas

- IT and telecommunications services,
- Implementation of customer surveys,
- Administration of registrations for events and procurement of travel services and VISA
- Shipping of advertising and information material

4.3 Transfer of data to other recipients

In connection with travel events, the data of the persons concerned are transmitted to travel agencies, tour operators, taxi companies and hotels.

For shipping purposes, your data may be passed on to shipping companies and customs.

For sales and marketing purposes, the data of those concerned may be transferred to our partners outside the Sauer Group.

In such cases, we transmit the personal data of the persons concerned on the basis of Art. 6 Para. 1 letter f GDPR. Our legitimate interest is to make our activities more effective with the help of external service providers and to be able to meet specific customer requirements.

In addition, personal data will only be passed on if this is permitted or required by law in individual cases (this applies in particular to data that must be passed on to the tax office or authorities), or if the person concerned has given us his or her specific consent to the transfer of data.

A list of the data recipients known to us at the time of data collection will be provided upon request.

4.4 Will data be transferred to a third country or to an international organisation and if so, on what legal basis is the transfer based?

A transfer of personal data to a third country (a state outside the European Economic Area) or to an international organisation will only take place if the legal requirements according to Art. 44 ff. GDPR.

These are among others

- Data transfer on the basis of an adequacy finding (Art. 45 GDPR),
- Data transmission subject to appropriate guarantees (Art. 46 GDPR),
- Exceptional circumstances for data transmission (Art. 49 GDPR, e.g. for the execution of a contract).

5 Rights of data subjects

In order to assert their rights, data subjects can contact us or our data protection officer at any time using the contact details given at the beginning of this data protection notice.

5.1 Revocation of consent (Art. 7 para. 3 GDPR)

If the processing of personal data is based on a granted consent, the persons concerned have the right to revoke their consent at any time. Revocation of consent shall not affect the lawfulness of the processing carried out on the basis of the consent until revocation.

5.2 Right to information (Art. 15 GDPR)

Data subjects have the right to obtain confirmation from the data controller as to whether we are processing personal data concerning them.

If personal data are processed, data subjects have the right at any time to obtain information about these personal data and to the information listed in Art. 15 para. 1 letters a-h GDPR (such as the purposes of the processing; the recipients or categories of recipients of the data, etc.).

If personal data are transferred to a third country or to an international organisation, data subjects have the right to be informed of the appropriate guarantees in accordance with Art. 46 GDPR in connection with the transfer.

We provide a copy of the personal data that is the subject of the processing. For all further copies requested, we may charge a reasonable fee based on administrative costs.

5.3 Right of rectification (Art. 16 GDPR)

Those affected have the right to demand that we correct incorrect personal data concerning them without delay. Taking into account the purposes of the processing, data subjects have the right to request the completion of incomplete personal data, also by means of a supplementary declaration.

5.4 Right of cancellation (Art. 17 GDPR)

Data subjects have the right to demand that the data controller delete personal data relating to them without delay, and we are obliged to delete personal data without delay if one of the reasons listed in Art. 17 para. 1 letters a-f GDPR applies and we are not entitled to further data processing (within the meaning of Art. 17 para. 3 GDPR).

5.5 Right to restrict processing (Art. 18 GDPR)

Data subjects have the right to ask us to limit the processing of their personal data if one of the conditions in Art. 18 para. 1 GDPR is met.

Where processing has been restricted in accordance with the above condition, such personal data, apart from being stored, shall only be processed with the consent of the data subject or for the purpose of pursuing, exercising or defending legal claims or protecting the rights of another natural or legal person or on grounds of an important public interest of the Union or a Member State.

5.6 Right to data transferability (Art. 20 GDPR)

Data subjects shall have the right to obtain the personal data concerning them which they have provided us with in a structured, common and machine-readable format and they shall have the right to have such data communicated to another data controller, without interference from the data controller to whom the personal data has been provided, provided that

- the processing is based on a consent pursuant to Art. 6 para. 1 lit. a or Art. 9 para. 2 lit. a or on a contract pursuant to Art. 6 para. 1 lit. b GDPR and
- the processing is carried out by means of automated procedures.

5.7 Right of objection (Art. 21 GDPR)

Data subjects have the right to object at any time, for reasons arising from their particular situation, to the processing of personal data concerning them that is carried out pursuant to Article 6, paragraph 1, letters e or f of the GDPR.

Where personal data are processed for the purpose of direct marketing, data subjects shall have the right to object at any time to the processing of personal data relating to them for the purpose of such marketing.

5.8 Right of appeal to a supervisory authority (Art. 77 GDPR)

Data subjects have the right to complain to the supervisory authority if they believe that their personal data are being processed unlawfully, in particular in breach of the GDPR.