

Privacy Policy

This Privacy Notice provides information about the nature, scope and purpose of the processing of personal data (hereinafter abbreviated to “data”) in connection with our online services and the affiliated web pages, functions and content as well as external online services such as our social media profiles. (hereinafter jointly referred to as “online services”). As regards the terms used, e. g. “personal data” or their “processing”, please refer to the definitions in Art. 4 of the General Data Protection Regulation (GDPR).

Controller:

Name/co: AustroCel Hallein GmbH

Street: Salzachtalstraße 88, P.O. Box 62,

Postcode, city, country: 5400 Hallein – Austria

Commercial register no.: Salzburg Commercial Court, 184407m

Managing director: Dipl.-Ing. (FH) Jörg Harbring

Phone number: +43 (0) 6245 890-0

Email: office@austrocel.com

Data protection officer:

Name: Ing. Walter Kogler

T: [+43 6245 890 320](tel:+436245890320)

M: [+43 664 6208 320](tel:+436646208320)

F: +43 664 6208 11320

Email: walter.kogler@austrocel.com

Types of Processed Data:

- Inventory data (e. g. names, addresses)
- Contact data (e. g. email, phone numbers)
- Usage data (e.g. visited web pages, interest in contents, access times)
- Meta-/communication data (e.g. device information, IP addresses)

Processing of special categories of personal data (Art. 9, para. 1 GDPR):

- No special categories of data are processed.

Categories of data subjects affected by the processing:

- Customers / interested parties / suppliers
- Visitors and users of the online services

Purpose of the processing:

- Provision of the online offer, its functions and contents.
- Replying to contact requests and communication with users.
- Marketing, advertising and market research

Version: 13/11/2019

1. *Applicable legal bases*

In accordance with Art. 13 GDPR, we hereby inform you about the legal bases of our data processing activities. If the legal basis is not mentioned in the Privacy Policy, the following applies: The legal basis for obtaining consent is Art. 6 (1) Point a and Art. 7 GDPR; the legal basis for the processing of data to provide our services and implement contractual measures as well as replying to requests is Art. 6 (1) Point b GDPR; the legal basis for the processing of data to comply with our legal obligations is Art. 6 (1) Point c GDPR; and the legal basis for the processing of data to protect our legitimate interests is Art. 6 (1) Point f GDPR. If processing is necessary to protect the vital interests of the data subject or another natural person, Art. 6 (1) Point d GDPR serves as the legal basis.

2. Changes to and updates of the privacy policy

We kindly request you to refer to the content of our privacy policy on a regular basis. We will modify the privacy policy whenever this is required due to changes in our data processing methods. We will inform you if we need your cooperation (e.g. consent) to implement the modifications or if any other individual notification becomes necessary.

3. *Security measures*

- In accordance with Art. 32, GDPR and taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, we shall implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk; the measures shall include, in particular, ensuring the ongoing confidentiality, integrity and availability of the data by controlling the physical and digital access to the data and their use, input, disclosure, availability and separation. In addition, we have put procedures in place that ensure compliance with the rights of data subjects, the erasure of data and a reaction to hazards to data security. Furthermore, we take the

protection of personal data into account during the initial development and/or the selection of hardware, software and procedures in accordance with the principle of data protection by design and by default (Art. 25, GDPR).

- The safety measures include in particular the encrypted transfer of data between your browser and our server.

4. *Cooperation with processors and third parties*

- *If we disclose or transfer or make available any data to other persons and companies (processors or third parties) during processing, this will only occur based on statutory permission (e.g. if a transfer of data to third parties such as payment service providers is required for the performance of a contract in accordance with Art. 6 Par. 1 (b) GDPR), your consent, a legal obligation that requires it or our legitimate interests (e.g. if an agent, webhosting provider, etc. is used).*
- If we commission third parties with the processing of data in the context of a so-called “data processing agreement”, this will occur based on Art. 28 GDPR.

5. Transfer to third countries

If we process data in a third country (i.e. outside the European Union (EU) or the European Economic Area (EEA)) or data is processed due to the use of third-party services or disclosure and/or transfer of data to third parties, this only occurs to fulfil our (pre)contractual obligations, based on your consent, due to a legal obligation or based on our legitimate interests. Subject to any legal or contractual authorisations, we only process data or have data processed in a third country if the special preconditions of Art. 44 et seq. GDPR apply. I. e. the processing is based on special guarantees such as the officially recognised assessment that the level of data protection corresponds to that of the EU (e. g. “Privacy Shield” in the US) or in compliance with officially recognised special contractual commitments (referred to as “standard contractual clauses”).

6. *Rights of the data subjects*

- You have the right to obtain confirmation as to whether or not personal data concerning you are being processed and access to these data as well as further information and a copy of the data in accordance with Art. 15 GDPR.
- According to Art. 16 GDPR, you have the right to request the completion or the rectification of inaccurate personal data concerning you.
- According to Art. 17 GDPR, you have the right to erasure of personal data without undue delay. Alternatively, you have the right to obtain a restriction of processing of the data according to Art. 18 GDPR.

- According to Art. 20 GDPR, you have the right to receive the personal data concerning you which you have provided to us and to have them transmitted to other controllers.
- Furthermore, you have the right to lodge a complaint with the competent supervisory authority pursuant to Art. 77 GDPR.

7. *Right of withdrawal*

You have the right to withdraw your consent with effect for the future in accordance with Art. 7 (3) GDPR.

8. *Right to object*

You have the right to object to the future processing of the personal data concerning you at any time according to Art. 21 GDPR. The right to object refers, in particular, to the processing for direct marketing purposes.

9. *Cookies and the right to object to direct marketing*

We use temporary and permanent cookies, i. e. small files which are saved on the users' devices (for an explanation of the term and function, please refer to the final section of this privacy policy). In part, the cookies are intended to ensure security or are required for the functionality of our online services (e. g. displaying of the website) or to save the user's decision regarding the confirmation of the cookie banner. In addition, we or our technology partners use cookies for coverage measurement and marketing purposes. In this privacy policy, the users are informed accordingly.

A general objection to the use of cookies for online marketing purposes is possible with a number of services, in particular regarding tracking, via the American website <http://www.aboutads.info/choices/> or the EU website <http://www.youronlinechoices.com/>. Furthermore, the saving of cookies can be prevented by disabling cookies in the browser settings. Please note that in this case, it may no longer be possible to use all functions of these online services.

10. *Erasure of data*

- The data which are processed by us are erased or their processing will be restricted in compliance with Art. 17 and 18 GDPR. Unless expressly stated in this Privacy Policy, the data we have saved will be erased as soon as they are no longer required for their purpose and the erasure does not conflict with any legal obligation to preserve records. If the data are not erased, since they are required for other purposes which are permitted by law, their processing will be restricted. I. e. the data is blocked and not processed for

any other purposes. This applies e.g. to data which has to be preserved due to commercial law or tax law.

- According to statutory provisions, data are retained in particular for 7 years as per sec. 132 para. 1 BAO [Austrian federal fiscal code] (accounting documents, receipts/bills, accounts, receipts, business documents, list of income and expenditure, etc.), for 22 years in connection with property and for 10 years in connection with electronically provided services, telecommunication, broadcasting and television services which are provided to nonentrepreneurs in EU member states and for which the Mini-One-Stop-Shop (MOSS) can be used.

11. *Contacting*

- If you contact us (via contact form or email), the user information shall be processed for the purpose of handling the contact request in accordance with Art. 6, para. 1 (b) GDPR.
- User information can be saved in our customer relationship management system (“CRM system”) or a comparable query organisation system.

12. *Collection of access data and log files*

- We will collect data on each access to the server where the service is hosted (referred to as server log files) based on our legitimate interests as defined by Art. 6 Par. 1 (f) GDPR. Access data include the name of the visited web page, file, date and time of access, the transferred volume of data, notification of successful access, browser type including version, the user’s operating system, referrer URL (previously visited web page), IP address and the requesting provider.
- Log file information shall be saved for a maximum of seven days for security reasons (e. g. clarification of acts of misuse or fraud) and shall be erased afterwards. Data which must be retained for longer periods for the purpose of providing proof are exempted from erasure until the incident has been clarified definitively.

13. *Online presence in social media*

- We have an online presence in social networks and platforms to communicate with customers, interested parties and users who are active there and to be able to inform them about our services. Regarding the use of these networks and platforms, the relevant operator’s terms and conditions as well as their data processing regulations apply.
- Unless otherwise indicated in our privacy policy, we shall process the data of users if they communicate with us via social networks and platforms, e. g. write contributions in our online presence or send us messages.

14. *Cookies & coverage measurement*

- Cookies are information which is transmitted to the users' web browsers by our web server or the web servers of third parties and is stored there for later access. Cookies may be small files or other types of stored information.
- We use “session cookies” which are only stored for the duration of the current visit to our online presence (e. g. to save your log-in status or the shopping cart function, i. e. to make the use of our online service possible). In a session cookie, a randomly generated unique identification number is stored which is referred to as session ID. In addition, a cookie contains information on its origin and storage period. These cookies are not able to store any other data. Session cookies will be erased as soon as you have finished using our online services and e. g. log off or close the browser.
- The users shall be informed in the present privacy policy about the use of cookies within the scope of pseudonymous coverage measurement.
- If users do not wish to have cookies stored on their computer, they are asked to disable the relevant option in the system settings of their browser. Stored cookies can be deleted in the system settings of the browser. The disabling of cookies may lead to restrictions regarding the functionality of the online services.
- You can object to the use of cookies for coverage measurement and marketing purposes via the deactivation page of the network advertising initiative (<http://optout.networkadvertising.org/>) and also the US web page (<http://www.aboutads.info/choices>) or the European website (<http://www.youronlinechoices.com/uk/your-ad-choices/>).

15. *Google Analytics*

- Based on our legitimate interests (i.e. interest in the analysis, optimisation and economic operation of our online services in accordance with Art. 6 Par. 1 (f) GDPR), we use Google Analytics, a web analytics service by Google LLC (“Google”). Google uses cookies. Information which is generated by the cookie on the usage of the online services by users is generally transferred to Google servers in the USA where it is saved.
- Google is certified according to the Privacy Shield Agreement and thus guarantees compliance with the European Data Protection Legislation (<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>).
- Google will use this information on our behalf to analyse the usage of our online services by the users, compile reports on the activities within these online services and to provide further services to us which are connected to the usage of these online services and internet usage. In this connection, pseudonymous usage profiles of users may be created.

- We use Google Analytics to show ads which are provided by Google web services and their partners only to those users who have shown interest in our online services or have certain characteristics (e. g. interest in certain topics or products which is determined based on visited web pages) which we transmit to Google (referred to as “remarketing” or “Google Analytics audiences”). With the help of remarketing audiences, we would also like to ensure that our ads correspond to the potential interest of the users and do not constitute an annoyance.
- We only use Google Analytics with enabled IP anonymisation. This means that the users’ IP address is abbreviated by Google within Member States of the European Union or in other states that are a party to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there.
- The IP address which is transmitted by the user’s browser will not be combined with other data from Google. The users can prevent cookies being saved by setting their browser software accordingly; in addition, the users can prevent the transmission of the data which are generated by the cookie and refer to the usage of the online services to Google and the processing of these data by Google by downloading and installing the browser plug-in available under the following link: <https://tools.google.com/dlpage/gaoptout?hl=de>.
- Further information on the data usage by Google, settings and objection options is available on the Google web pages: <https://www.google.com/intl/de/policies/privacy/partners> (“Data usage by Google if you use the websites or apps of our partners”), <https://policies.google.com/technologies/ads> (“Data usage for marketing purposes”), <https://adssettings.google.com/authenticated> (“Manage the information that Google uses to display ads”).
- If you want to know which Cookies we could use, please follow the link: <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

16. Google re-/marketing services

- Based on our legitimate interests (i. e. interest in the analytics, optimisation and economical operation of our online services in accordance with art. 6 para. 1 (f) GDPR), we use the marketing and remarketing services (in short “Google Marketing Services”) by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA, (“Google”).
- Google is certified according to the Privacy Shield Agreement and thus guarantees compliance with the European Data Protection Legislation

(<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>).

- The Google marketing services allow us to display ads for and on our website in a more targeted manner to present only ads to users which potentially correspond to their interests. If e. g. ads are displayed for products in which a user has shown interest on other webpages, this is called “remarketing”. For this purpose, a Google code is executed directly by Google when our web pages and other web pages on which Google Marketing Services are active are accessed and so-called (re)marketing tags (invisible graphics or code, also referred to as “web beacons”) are embedded. With the help of these tags, an individual cookie, i.e. a small file, is saved on the user’s device (instead of cookies other comparable technologies may also be used). Cookies can be set by various domains including google.com, doubleclick.net, invitemedia.com, admeld.com, googlesyndication.com or googleadservices.com. The web pages visited by the user, the content they are interested in, the offers they clicked on as well as technical information on browser and operating system, referring web sites, duration of the visit and other information regarding the usage of the online services are stored in this file. In addition, the user’s IP address is recorded. In this regard, we inform you within the scope of Google Analytics that the IP address is abbreviated in EU member states or other states in the European Economic Area and is only transmitted as a whole to a Google server in the USA and abbreviated there in exceptional cases. The IP address will not be matched with data of the user within other services provided by Google. Google may connect the above information to corresponding information from other sources. If the user subsequently visits other web pages, ads which are adjusted to their interests can be displayed.
- The data of the users will be processed pseudonymously within the scope of Google Marketing Services. This means that Google saves and processes e. g. not the user’s name or email address but the relevant data based on cookies in pseudonymous user profiles. This means that from Google’s point of view, the ads are not managed and displayed for an actually identified person but for cookie owners independent of the identity of the cookie owner. This does not apply if a user has expressly allowed Google to process data without pseudonymisation. The information which Google Marketing Services has collected on the user are transmitted to Google and saved on Google servers in the USA.
- Google Marketing Services we use include the online advertising program “Google AdWords” and others. In case of Google AdWords, each AdWords

customer receives a different “conversion cookie”. Cookies can therefore not be tracked via the websites of AdWords customers. The information which was obtained with the help of the cookie is used to create conversion statistics for AdWords customers who opted for conversion tracking. AdWords customers receive information on the total number of users who clicked on their advertisement and were referred to a page with a conversion tracking tag. They do, however, not receive any information which can be used for the personal identification of the users.

- Based on the Google Marketing Service “DoubleClick”, we are able to embed the ads of third parties. DoubleClick uses cookies which help Google and their partner websites to place ads based on the visits of users on this website or other websites on the Internet.
- In addition, we can use the “Google Optimizer” service. Google Optimizer allows us to understand through so-called “A/B testings” which effects various changes to a website have (e. g. changes to input fields, design, etc.).
For the purpose of these tests, cookies will be saved on user devices. Only pseudonymous data of the users will be processed.
- Furthermore, we can use the “Google Tag Manager” service to embed and manage the Google analysis and marketing services on our website.
- For further information on data use for marketing purposes by Google, please refer to the overview page:<https://policies.google.com/technologies/ads>, the privacy policy of Google is available at <https://policies.google.com/privacy>
- If you would like to object to the interest-related advertising by Google marketing services, you can use the setting and opt out options provided by Google: <https://adssettings.google.com/authenticated>.

17. Facebook, Custom Audiences and Facebook Marketing Services

- We use the so-called “Facebook Pixel” by the social network Facebook which is operated by Facebook Inc., 1 Hacker Way, Menlo Park, CA 94025, USA, or, if you are an EU resident, Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland (“Facebook”) within the scope of our online services based on our legitimate interests in the analysis, optimisation and economical operation of our online services and for these purposes.
- Facebook is certified according to the Privacy Shield Agreement and thus guarantees compliance with the European Data Protection (<https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active>).

- With the help of the Facebook Pixel, Facebook is able to identify visitors of our online services as a target group for the display of ads (so-called “Facebook Ads”). We therefore use the Facebook Pixel to show Facebook Ads which are provided by us only to those Facebook users who have shown interest in our online services or have certain characteristics (e. g. interest in certain topics or products which is determined based on visited web pages) which we transmit to Facebook (referred to as “Custom Audiences”). With the help of Facebook Pixels, we would also like to ensure that our Facebook Ads correspond to the potential interest of the users and do not constitute an annoyance. With the help of the Facebook Pixel, we can also track the effectiveness of Facebook ads for statistical and market research purposes since we can see whether a user was transferred to our website after clicking on a Facebook ad (so-called “conversion”).
- Facebook processes data based on their data use policy. General information on the presentation of Facebook ads can therefore be found in their data use policy: <https://www.facebook.com/policy.php>. For dedicated information and details on the Facebook pixel and its function, please refer to the Facebook help area: <https://www.facebook.com/business/help/651294705016616>.
- You can object to the data collection by the Facebook Pixel and to the use of your data for the displaying of Facebook ads. To adjust your settings regarding the type of advertising you would like to see on Facebook, you can access the corresponding page provided by Facebook and follow the instructions on the settings for usage-based advertising: <https://www.facebook.com/settings?tab=ads>. The settings are independent of the platform, i. e. they are applied to all devices such as desktop computers or mobile devices.
- In addition, you have the right to object to the use of cookies for coverage measurement and marketing purposes via the opt out page by the network advertising initiative (<http://optout.networkadvertising.org/>) and also the US website (<http://www.aboutads.info/choices>) or the European website (<http://www.youronlinechoices.com/uk/your-ad-choices/>).

18. *Use of third-party services and content*

- As part of our online services, we use content or services which are provided by third parties to embed their content and services such as videos or fonts (hereinafter uniformly referred to as “content”) based on our legitimate interests (i. e. interest in the analysis, optimisation and economical operation of our online services in accordance with Art. 6(1) point (f) GDPR). As a prerequisite, the third-party providers of this content need to know the

user's IP address since they would otherwise not be able to send the content to the user's browser. The IP address is therefore required to display such content. We will attempt to only use content whose provider uses the IP address for the delivery of the content only. Furthermore, third parties can use so-called pixel tags (invisible graphics, also referred to as "web beacons") for statistical or marketing purposes. With the "pixel tags", information such as the visitor traffic on the pages of this website can be analysed. The pseudonymous information can also be saved as cookies on the user's device; among other data, they may contain technical information on the browser and operating system, referring web pages, access time and other information on the use of our online services and it can be linked to such information from other sources.

- The following list provides an overview of third-party providers and their content including links to their Privacy Notices which contain further information on the processing of data and options to object (referred to as opt out), some of which have already been mentioned here: External fonts by Google, LLC., <https://www.google.com/fonts> ("Google Fonts"). Google Fonts are embedded by a server call at Google (usually in the USA). Privacy Notice: <https://policies.google.com/privacy>, opt out: <https://adssettings.google.com/authenticated>.
- Maps provided by the "Google Maps" service of the third party provider Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. privacy policy: <https://www.google.com/policies/privacy/>, Opt-Out: <https://www.google.com/settings/ads/>.
- Videos provided by the "YouTube" platform of the third party provider Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Privacy Notice: <https://policies.google.com/privacy>, opt out: <https://adssettings.google.com/authenticated>.