

## Privacy policy PROMOT Automation GmbH

Dear Sir or Madam,

in fulfillment of the information obligations pursuant to the EU General Data Protection Regulation (Article 13 and Article 14), PROMOT Automation GmbH (hereinafter also referred to as “we”) hereby informs you about the processing of your personal data within the scope of our business relationship.

### General

The protection of your personal data is of particular concern to PROMOT Automation GmbH. Therefore, we process your data exclusively on the basis of the legal provisions (EU Data Protection Regulation “EU-DSGVO”, Data Protection Act DSG, Telecommunications Act “TKG”). In the following, we inform you as an existing or future business partner or interested party about the most important aspects of data processing in the context of our current and future business relationship.

When collecting and processing personal data, PROMOT Automation GmbH pays attention to purpose limitation, accuracy, data minimization, storage limitation, integrity and confidentiality.

PROMOT Automation GmbH uses numerous technical and organizational security measures in order to protect your data against manipulation, loss, destruction and against access by third parties. Our security measures are continuously being improved in line with technological developments on the Internet.

### Purpose and legal basis of data processing

PROMOT Automation GmbH stores and processes the data provided by you for the purpose of preparing and obtaining quotations, invoices, contract management, customer and supplier support and for marketing and advertising purposes.

The legal basis for the processing of your personal data is the performance of a contract, including the initiation of a contract (Article 6(1)(b) EU-DSGVO), the fulfillment of legal obligations (Article 6(1)(c) EU-DSGVO) and the protection of legitimate interests in the processing of your data (Article 6(1)(f) EU-DSGVO). If none of the aforementioned legal bases is applicable, we will ask you for consent to process personal data (Article 6(1)(a) EU-DSGVO).

### Information about the processing of your personal data

Normally, the legitimate interest of processing personal data is to ensure smooth business operations. The specific purposes for which your data is processed depend on your own area of activity and the specific relationship with PROMOT Automation GmbH.

The provision of your personal data is necessary for the fulfillment of the contract or the implementation of pre-contractual measures. Without this data, we cannot conclude a contract with you.

In general, the personal data collected is processed for the following legitimate business purposes:

- Providing products and services to you and to accommodate your requests
- Customer and supplier relationship management and communication
- Product development
- Improving the user experience of our website
- Marketing of our products or services

- Dissemination of advertising for (other) goods and services of the Company by way of direct marketing<sup>1</sup> (“Marketing Purposes”).
- Conducting customer surveys and product surveys
- Organization of events and fairs
- Contacting you to inform you about our new products and services and to send you related electronic direct marketing, unless you have indicated that you do not want to be contacted
- Customer management, accounting, logistics and bookkeeping
- Business relations with customers, suppliers, distributors, interested parties and partners in the course of carrying on a business, including systematic recording of all business transactions concerning income and expenses
- Compliance with laws or legal obligations

### **Website visit/Cookies/Web analytics service**

The following policies apply to our websites [www.promot-automation.com](http://www.promot-automation.com) and [www.promro.com](http://www.promro.com).

If our websites are only used for informational purposes (no registration and no transmission of other information), personal data is collected that is transmitted from your browser to our server. This is technically necessary in order to display our websites to you and to ensure the stability and security of the websites.

Our websites use so-called cookies. These are small text files that are stored on your terminal device with the help of the browser. They do not cause any damage. We use cookies to make our offer user-friendly. Some cookies remain stored on your terminal device until you delete them, and they enable us to recognize your browser on your next visit.

If you do not want this to happen, you can set up your browser so that it informs you about the setting of cookies and you only allow it in individual cases. When deactivating cookies, the functionality of our websites may be limited.

This website uses Google Analytics, a web analytics service provided by Google Ireland Limited, Barrow Street, Dublin 4, Ireland. („Google“). Google Analytics uses cookies to help the website analyze how users use the site. The information generated by the cookie about your use of this website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google’s behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

#### [Terms of use for Google Analytics](#)

Our website also contains links to other websites that are completely independent of our website. We cannot make any contractual representation or warranty as to the accuracy, completeness or authenticity of the information contained in any of these links or any other website. Access to any other websites linked to our website is at your own risk and is therefore not covered by the provisions of this privacy policy. The content of linked websites is the sole responsibility of their operators.

However, should you activate a link, it is possible that the operator of this website will collect data about you and process it in accordance with the website’s privacy policy, which may differ from ours.

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<sup>1</sup> Direct marketing is the direct approach of the data subject for advertising purposes, such as sending letters or brochures, by telephone calls or electronic messages.

Please always also inform yourself about the current data protection regulations on the websites linked by us.

### **ManageWP**

We only manage the website [www.promot-automation.com](http://www.promot-automation.com) using the tool ManageWP. The provider is GoDaddy.com WP Europe, Trg republike 5, 11000 Belgrade, Serbia (hereinafter ManageWP). ManageWP allows us to, among other things, monitor the security and performance of our website and make automatic backups. ManageWP thus has access to all website content, including our databases. ManageWP is hosted on the provider's servers.

The use of ManageWP is based on Art. 6 para. 1 lit. f DSGVO. The website operator has a legitimate interest in the most effective and secure operation of its website(s). If a corresponding consent has been requested, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a DSGVO and § 25 para. 1 TTDSG, insofar as the consent includes the storage of cookies or access to information in the user's terminal device (e.g. device fingerprinting) as defined by the TTDSG. The consent can be revoked at any time.

### **Wordfence**

We have only integrated Wordfence on the website [www.promot-automation.com](http://www.promot-automation.com). The provider is Defiant Inc, Defiant, Inc, 800 5th Ave Ste 4100, Seattle, WA 98104, USA (hereinafter "Wordfence"). Wordfence serves to protect our website from unwanted access or malicious cyberattacks. For this purpose, our website establishes a permanent connection to Wordfence's servers so that Wordfence can compare its databases with the accesses made to our website and block them if necessary.

The use of Wordfence is based on Art. 6 para. 1 lit. f DSGVO. The website operator has a legitimate interest in protecting its website as effectively as possible against cyberattacks. If a corresponding consent has been requested, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a DSGVO and § 25 para. 1 TTDSG, insofar as the consent includes the storage of cookies or access to information in the user's terminal device (e.g. device fingerprinting) as defined by the TTDSG. The consent can be revoked at any time. Data transfer to the USA is based on the standard contractual clauses of the EU Commission. Details can be found here:

<https://www.wordfence.com/help/general-data-protection-regulation/> .

### **Storage duration**

The personal data will be retained for as long as is necessary to fulfill the aforementioned purposes and, in addition, for as long as legal retention periods exist and as long as legal claims can be asserted by or against PROMOT Automation GmbH (within the applicable statutory limitation periods).

### **Data security and data sharing//Recipients**

In order to fulfill a processing purpose, a transfer of the data relevant in the respective individual case to third parties, possibly also outside the EU/EEA, may be necessary.

PROMOT Automation GmbH uses a variety of structural, infrastructural, organizational and IT security measures to ensure the confidentiality and integrity of customer data. Any data disclosure or data transfer is carried out exclusively on the basis of legal regulations.

The data processed by us will not be transferred to recipients in third countries or international organizations. As a matter of principle, your data will not be transferred to third parties unless we are legally obliged to do so, the transfer of data is necessary for the performance of a contractual relationship concluded between us or you have previously given your express consent to the transfer of your data. External order processors or other cooperation partners will only receive your data if this is necessary for the execution of the contract or if we have a legitimate interest in doing so, which will always be disclosed separately in the event of an incident. If one of our order processors comes into

contact with your personal data, PROMOT Automation GmbH will ensure that it complies with the provisions of data protection laws in the same way as PROMOT Automation GmbH.

If our contractual partners or order processors are based in a third country, i.e., a country outside the European Economic Area (EEA), PROMOT Automation GmbH will inform you about the consequences of this circumstance in the description of the offer.

Possible recipients may include:

- Competent authorities, offices, institutions and courts (e.g. tax authorities, security authorities, labor inspectorate, patent office)
- Banks
- Interest groups
- Legal representatives, lawyers, tax advisors, auditors
- Customers, (sub-)suppliers, interested parties and other contractual or business partners of PROMOT Automation GmbH (e.g. experts, surveyors, consultants, research institutions, universities, forwarding agents, insurance brokers) who participate or are to participate in the delivery or service
- Funding source
- Classification societies, certification bodies and auditors
- Insurances

Insofar as this is necessary to fulfill the processing purposes, personal data is also passed on to order processors, e.g., IT service providers.

### **Data subject rights/Right of objection and revocation/Right of appeal**

As a data subject, you have the following rights with regard to the personal data concerning you:

Right of Access by the data subject (Article 15 EU-DSGVO):

As a data subject of the data processing described above and other data processing, you have the right to request information about whether – and if so, which – personal data about you is being processed. For your own protection – so that no unauthorized person receives information about your data – PROMOT Automation GmbH will verify your identity in an appropriate form before providing information.

Right to rectification (Article 16) and erasure (Article 17 EU-DSGVO):

You have the right to request without undue delay the rectification of inaccurate personal data concerning you or – taking into account the purposes of the data processing – the completion of incomplete personal data, as well as the erasure of your data, provided that the criteria pursuant to Article 17 EU-DSGVO are met.

Right to restriction of processing (Article 18 EU-DSGVO):

You have the right to restrict the processing of all collected personal data under the legal conditions. As of the restriction request, this data will only be processed with your individual consent or for the assertion and enforcement of legal claims.

Right to data portability (Article 20 EU-DSGVO):

You may request the unimpeded and unrestricted transfer of personal data that you have provided to us to you or to a third party.

Right to object (Article 21 EU-DSGVO):

You may object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you, which is necessary for the purposes of protecting our legitimate interests or those of a third party. Your data will no longer be processed after objection, unless there are compelling legitimate grounds for processing that override your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims. You may object to data processing for the purpose of direct marketing at any time with effect for the future.

In principle, you have the rights to access, rectifications, erasure, data portability, revocation and objection. To exercise the rights listed, you must inform us personally and in writing at [datenschutz@promot.at](mailto:datenschutz@promot.at).

Please note that PROMOT Automation GmbH can only provide you with information if you can identify yourself perfectly.

If you believe that the data processing violates applicable data protection law or that PROMOT Automation GmbH is violating your data protection rights, please get in touch with your point of contact at PROMOT Automation GmbH or our data protection officers ([datenschutz@promot.at](mailto:datenschutz@promot.at)) so that we can take remedial action. You also have the right to lodge a complaint with the relevant supervisory authority. In Austria, this is the data protection authority based in Vienna:

Austrian Data Protection Authority  
Barichgasse 40–42, 1030 Vienna  
Phone: +43 1 52 152 0  
E-mail: [dsb@dsb.gv.at](mailto:dsb@dsb.gv.at)

### **Changes to this privacy policy**

As this information is subject to the current legal situation, we reserve the right to update this data protection declaration accordingly in the future. We at PROMOT Automation GmbH recommend that you read this privacy policy regularly to stay informed about the protection of the data we collect. By continuing to use our websites or by maintaining a business relationship with us, you consent to the data privacy policy and its revised terms.

### **Contact information/Person responsible for data processing**

PROMOT Automation GmbH  
Erich-Weickl-Straße 1  
4661 Roitham am Traunfall  
AUSTRIA  
E-Mail: [datenschutz@promot.at](mailto:datenschutz@promot.at)