

PRIVACY POLICY

- **Holder:** THIELMANN UCON GmbH (hereinafter referred to as "THIELMANN").
- **Tax Identification Number:** DE 112 589 766
- **Registered office:** Gustav-Rivinius-Platz 2, 77756 Hausach, Germany
- **Telephone:** +49 7831/ 77-0
- **E-mail:** sales@thielmann.com

2.- INFORMATION

By accepting this Privacy Policy, the user (hereinafter, the "**Distributor**") is informed that the data it provides through the website located at the URL spareparts.thielmann.com (hereinafter, the "Website"), will be processed by THIELMANN, as well as the data derived from the Distributor's navigation and any other data it may provide in the future.

The Distributor should read this Privacy Policy carefully, as it has been drafted in a clear and simple manner to facilitate its understanding. The Distributor may determine, freely and voluntarily, whether or not it wishes to provide its data to THIELMANN.

3.- OBLIGATION TO DISCLOSE DATA

The data requested in the forms of the Website are generally mandatory (unless otherwise specified in the required field) to meet the purposes for which they are being collected.

Therefore, if they are not provided or are not provided correctly, the Distributor's requests cannot be met, but the user may still freely view certain contents of the Website.

4.- FOR WHAT PURPOSE WILL THIELMANN PROCESS THE DISTRIBUTOR'S DATA?

The Distributor's data will be processed by THIELMANN according to the following purposes:

a) To manage the product purchase process: To manage the purchase process and process the delivery of the products selected by the Distributor, as well as to view the Distributor's purchase history.

b) Respond to the questions raised by the Distributor through the authorized contact channels: Manage, process and respond to requests, applications, incidents, complaints or queries of the Distributor submitted through the various communication channels made available to it.

c) Sending commercial communications to the Distributor: Sending commercial communications to the Distributor about THIELMANN brand products and services, by electronic and/or conventional means, unless you have expressed your opposition to it.

d) To comply with legally established obligations: When the processing is necessary to comply with a legal obligation derived from European Union law and may be applicable to THIELMANN (tax regulations, for example).

5.- WHAT DATA WILL THIELMANN PROCESS?

THIELMANN may process the following Distributor's data:

a) Manage the product purchase process:

- **Identification data**: name and surname.
- **Contact details**: e-mail address, telephone number and postal address.

b) To answer the questions raised by the Distributor through the authorized contact channels:

- **Identification data**: name and surname.
- **Contact details**: e-mail address, telephone number and postal address.

c) Send commercial communications to the Distributor:

- **Identification data**: name and surname.
- **Contact details**: e-mail address, telephone number and postal address.

d) To comply with legally established obligations: Any data that may be legally required.

When the Distributor provides third party data, it states that it has the consent of the same and/or sufficient legitimacy and, it undertakes to transfer them the information contained in the Privacy Policy, exempting THIELMANN from any responsibility in this regard.

However, THIELMANN may carry out the appropriate verifications to ascertain this fact, adopting the corresponding due diligence measures, in accordance with data protection regulations.

6.- WHAT IS THE LEGAL BASIS OF THIELMANN'S PROCESSING OF THE DISTRIBUTOR'S DATA?

The processing of the Distributor's data by THIELMANN has as legal basis the fulfilment of the contract between the parties, as well as, if applicable, the legitimate interest, the fulfilment of legal obligations and the consent requested, which can be withdrawn at any time. In particular, THIELMANN processes the Distributor's data according to the following legal bases:

a) Manage the product purchase process: The processing of data derived from this purpose will have as a basis of legitimacy the fulfillment of the contractual relationship.

b) To answer the questions raised through the contact channels enabled: The processing of data derived from this purpose is the consent that the Distributor may withdraw at any time. In case the Distributor withdraws the consent, the consultation or question raised cannot be processed.

c) Sending commercial communications: The processing derived from this purpose will have as a basis of legitimacy the legitimate interest.

d) To comply with the obligations established by law: All the processing derived from this purpose will be based on the compliance of a legal obligation

The consents obtained for the above-mentioned purposes are independent and the Distributor may revoke only one of them without affecting the others.

7.- DATA RETENTION

The Distributor's data will be kept by THIELMANN during the following periods:

a) Data provided to manage the purchase process: the data provided to manage the purchase process and the order history will be kept during the execution of the contractual relationship. Once this period has expired, the data will be kept blocked during the period of prescription of the legal actions that can be derived from it.

b) Data used to respond to the questions raised through the authorized contact channels: the data will be kept for the period necessary to process and respond to your request and, once this period has expired, for the period of prescription of the legal actions derived from the aforementioned request.

c) Data used for sending commercial communications: the data will be processed in accordance with this purpose until the Distributor objects to the processing.

d) To comply with the legally established obligations: The data provided in order to comply with the obligations derived from the services offered by will be kept for the legally established periods of time.

8.- WITH WHICH RECIPIENTS WILL THE DISTRIBUTOR'S DATA BE SHARED?

The data of the Distributor may be communicated to:

- Public Administrations, in the cases provided for by law, based on the fulfillment of a legal obligation.

- Courts and Tribunals, in the cases provided for by law, based on the fulfilment of a legal obligation.
- The companies of the business group to which THIELMANN belongs, for administrative and business management purposes, on the basis of the legitimate interest recognised in recital 48 of the RGPD.

9.- COMMERCIAL AND PROMOTIONAL COMMUNICATIONS

One of the purposes for which THIELMANN processes the data provided by the Distributors is to send them commercial communications with information regarding products, services, promotions, offers, events or news, relevant to the Distributors, as well as THIELMANN's Newsletter.

In case the Distributor wishes to stop receiving commercial or promotional communications from THIELMANN, he may request to be removed from the service by clicking on the link that will appear at the bottom of the commercial communications sent.

10.- DISTRIBUTOR LIABILITY

The Distributor guarantees that he or she is over eighteen (18) years old and that the information he or she provides to THIELMANN is true, accurate, complete, and up-to-date. To this end, the Distributor is responsible for the truthfulness of all the data it communicates and will keep the information provided suitably updated so that it corresponds to your real situation.

Likewise, it guarantees that it has informed the third parties of which it provides its data, if it does so, of the aspects contained in this document. Likewise, you guarantee that you have obtained their authorisation to provide your data to THIELMANN for the aforementioned purposes.

In any case, the Distributor shall be responsible for any false or inaccurate information provided through the Website and for any direct or indirect damage caused to THIELMANN or to third parties.

11.-RIGHTS

As owner of the data, the Distributor may send a letter to THIELMANN, at the address indicated in the header of this Privacy Policy, or by e-mail to: sales@thielmann.com, attaching a copy of a document proving identity, at any time and free of charge, to exercise the rights of access, rectification, erasure, limitation of treatment, revocation of consent and total or partial opposition to treatment and data portability.

12.- SAFETY MEASURES

THIELMANN shall treat the Distributor's data at all times in an absolutely confidential manner and keeping the mandatory duty of secrecy with respect to them, in accordance with the provisions of the applicable regulations, adopting to that effect the necessary technical and organizational measures that guarantee the security of your data and avoid their alteration, loss, treatment or unauthorized access, taking into account the state of technology, the nature of the stored data and the risks to which they are exposed.

13.- UPDATES

THIELMANN reserves the right to revise its Privacy Policy at any time, in which case the Distributors will be informed. For this reason, please check this privacy statement regularly to read the most recent version of THIELMANN's Privacy Policy.

14.- ACCEPTANCE AND CONSENT

The Distributor declares that he has been informed of the conditions regarding the protection of personal data, accepting the content of this Privacy Policy.

Last updated: May 7th, 2020.