

PRIVACY POLICY FOR EVENTS

September 2019

We attach great importance to your privacy and your personal data. We therefore process your data exclusively on the basis of the applicable statutory regulations, in particular the Austrian Data Protection Act - **DPA**, the EU General Data Protection Regulation (**GDPR**) as well as the Austrian Telecommunications Act (**TCA**).

This privacy policy informs you how we process your personal data when you register for one of our internal or external events or when pictures (photos or film shots) are taken during our events, and what your corresponding rights are. This privacy policy may be complemented by additional information, terms or hints we provide to you.

1. CONTROLLER

STARLIM Spritzguss GmbH, Muehlstrasse 21, 4614 Marchtrenk, Austria, T +43 (7243) 58596-0, F +43 (7243) 58596-5, office@starlim-sterner.com (referred to below as „starlim-sterner“, “we“ or “us“).

2. PROCESSING OF PERSONAL DATA, PURPOSE AND LEGAL BASIS

If you wish to attend an event for which prior registration is necessary for organizational reasons, we will process the data provided to us in the course of registration, e.g.:

- Contact information, such as name, company, function, company, telephone number, email;
- Event-depending individual information, such as name, place and date of the event.

In general, you have provided this data to us. However, we may have lawfully received this data from the company for which you are working for (e.g. from your colleagues or superiors) or from your family members. You are not obliged to submit us personal data, but it may be necessary for your registration for certain events. If you do not provide us personal data in this case, we will not be able to process your registration and you will therefore not be able to participate the event.

Moreover, we usually take

- pictures (photos or film shots)

during our events on which you can be shown as a participant.

Please note that the concrete data processed by us depends on the individual case (e.g. depending on the event).

Purpose of the processing:

In the course of events, your personal data may be processed for the following purposes:

- Planning and organization of the event;
- Documentation, reporting, public relations and information about the event. Selected photos and/or film shots will be stored and – as the case may be, with other personal data you have provided to us (e.g. name, company, function in the company) – published on our website, social media channels (Facebook, Instagram, YouTube), in the starlim-sterner employee magazine, on our info-screens in the company building and/or in online and print media for the purpose of documentation of the event and presentation of our activities. Any use of images for advertising purposes is subject to your prior consent.

Please note that we do not process all above listed personal data in each case. The processing of data depends on the respective individual case (e.g. the respective event).

Legal basis:

The processing is based on the implementation of pre-contractual measures and performance of a contract in accordance with Art. 6(1)(b) GDPR as well as on our legitimate interests pursuant to Art. 6(1)(f) GDPR (where appropriate, in conjunction with § 12(2)(4) DPA, or § 9 DPA). Our legitimate interests lie in the organization and documentation of events, reporting of events, public relations work and information about our events and, where applicable, in the establishment, exercise or defence of legal claims. Only in exceptional cases, if none of the mentioned legal basis is eligible, the processing is based on your consent pursuant to Art. 6(1)(a) GDPR (e.g. in the case of minors or any advertising use of photos/film recordings in individual cases, in conjunction with § 12(2)(2) DPA).

3. DO WE SHARE YOUR DATA?

Provided this is necessary and permitted to fulfill the above stated purposes, we may share personal data with other departments or companies of our group (<https://www.starlim-sterner.com/en/contact/company-sites/>) or with third parties such as business partners. Personal data may also be submitted to our data processors (e.g. service provider who are responsible for organizing and performance of events or IT-provider).

Except where otherwise stated in this Privacy Policy, we will not disclose your personal data to other recipients, unless this is necessary for the assertion, exercise or defence of legal claims or for the fulfilment of our obligations or this is legally or officially

obligatory. Possible recipients in this case may be legal representatives, competent authorities, offices and courts. In the case of social media channels, the respective social media service may be granted exploitation rights to the published data.

If the above-mentioned recipients are located in countries outside of the European Union (in so-called "third countries"), the local data protection laws may not offer the same data protection level as in your country of residence. A transfer will therefore only take place in accordance with the statutory provisions if the European Commission has adopted an adequacy decision for the third country, if appropriate safeguards have been agreed with the recipient (e.g. EU Standard Contractual Clauses), the recipient participates in an approved certification system, binding corporate rules according to Art. 47 GDPR exist or there is a derogation for specific situations according to Art 49 GDPR (e.g. the transfer is necessary for the performance of a contract between you and us or you have explicitly consented to the proposed transfer).

4. HOW LONG DO WE STORE YOUR DATA?

As soon as your personal data is no longer required for the fulfillment of the abovementioned purposes, your data will be deleted, unless there are longer statutory retention periods or other (legally justified) purposes, which require a continued storage of your data.

5. YOUR RIGHTS

Under the GDPR, you have the following rights:

- Right to **access** the personal data concerning you that is being processed by us (Art. 15 GDPR);
- Right to **rectification** of inaccurate data (Art. 16 GDPR);
- Right to **erasure** (Art. 17 GDPR), where appropriate;
- Right to **restriction of processing** of your data (Art. 18 GDPR), where appropriate;
- Right to **object** to the data processing at any time on grounds relating to your particular situation (Art. 21 GDPR); we will respect your wish not to be photographed or filmed. Please inform the photographer on site when you do not wish to be photographed or filmed. In case the rights and freedoms of the data subject are violated in exceptional circumstances, we will take proper measures in order to refrain from any further processing activities because of the objection. Please note that an obliteration in already published media is not possible. A deletion in social media (Facebook, Instagram, YouTube) will take place within technical feasibility.
- Right to **receive** the personal data concerning you in a structured, commonly used and machine-readable format (Art. 20 GDPR), where appropriate;

- Right to **withdraw consent declarations** at any time without a reason in order to hinder further processing of your personal data that has been collected and used based on a consent declaration;
- Right to lodge a complaint with the supervisory authority.

In case of any questions concerning your personal data, contact us at privacy@starlim-sterner.com.

6. MISCELLANEOUS

We may adjust this Privacy Policy if necessary. In case of significant amendments, we will inform you separately.