

## Data Protection Information

### 1. Contact Information for the Controller as well as for the Data Protection Officer of the Company

Controller:

Veritas Treuhand GmbH & Co. KG Wirtschaftsprüfungsgesellschaft  
Langenstraße 10-12 · 28195 Bremen · Germany  
T +49 421 223087-0 · F +49 421 223087-60  
Email: veritas@veritastreuhand.de

Data Protection Officer:

einfach. effizient. Treuhand  
Unternehmensberatung GmbH & Co. KG  
Data Protection Officer  
Langenweg 55 · 26125 Oldenburg · Germany  
T +49 441 9710-254 · F +49 441 9710-225  
Email: datenschutz@treuhand.de

### 2. Purposes and Legal Bases of Data Processing

We process Personal Data, which we receive within the scope of our business relations from our customers. This also covers the use for the purpose of reviewing, whether a client relationship will be allowed as well as the regular client management and quality assurance.

In addition, we process - insofar as this is required to render our services - Personal Data, which we permissibly collect from publicly accessible sources (e.g. debt directories, land registers, trade and association registers, press, internet) or which are legitimately submitted to us by other companies of the Treuhand Group or by other third parties (e.g. from a credit agency).

The collection of these data is carried out

- to be able to identify you as our client
- to adequately consult and represent you
- for the correspondence with you
- for the invoicing
- for the processing of any possible liability claims as well as for the enforcement of possible claims against you

The purposes of data processing will mainly depend on the concrete contract (e.g. annual audit, financial accounting, payroll accounting) and may, inter alia, cover the consulting, the auditing as well as the preparation of tax returns and payroll accounting. The details of the data processing purposes are included in the relevant contract documents and terms of business.

The processing of Personal Data will be carried out in accordance with the EU General Data Protection Regulation (GDPR) and the Federal Law on Data Protection (new):

#### For the fulfilment of pre-contractual obligations (Art. 6 para. 1 lit. b GDPR)

The processing is carried out to render services within the scope of the performance of our contracts with our clients or for the performance of services prior to entering into a contract carried out upon inquiry.

#### Within the scope of the assessment of interests (Art. 6 para. 1 lit. f GDPR)

Insofar as necessary, we process data to maintain legitimate interests of us or of third parties. Examples:

- Advertising, insofar as you did not object to the use of your data
- Enforcement of legal claims and defence in case of legal disputes
- Ensuring IT security as well as building security (e.g. access controls)
- Insofar as the processing based on a contract requires the processing of data of third parties

#### On the basis of legal requirements (Art. 6 para. 1 lit. c GDPR)

We are subject to legal requirements legally obliging us to process Personal Data (e.g. Money Laundering Act). The purposes of processing cover, inter alia, the identity verification and the money laundering prevention as well as the fulfilment of notification obligations under tax law.

#### On the basis of a consent granted (Art. 6 para. 1 lit. a GDPR)

The purposes of the processing of Personal Data result from the granting of a consent (e.g. the sending of a newsletter, release from the professional obligations for confidentiality etc.). The consent granted may be revoked at any time becoming effective for the future. Also consents granted before the date of effectiveness of the GDPR (May 25, 2018) may be revoked. Any processing carried out before the revocation will not be affected by the revocation.

### 3. Categories of Personal Data

- Title, first name, family name
- Date and place of birth and citizenship
- Identification data
- Authentication information
- A valid email address
- Address
- Phone number (landline and/or mobile)
- Information required to fulfil the contract such as
- Marital status;
- Information on children
- Information on health insurance
- Information on tax class
- Information on working hours
- Information on social security insurance
- Bank details

### 4. Recipients of Personal Data

Within the organization, those departments will have access to data, which require such data to fulfil the contractual and statutory obligations. The companies of the Treuhand Group work together according to division of labor. A transfer of personal data to other companies of the group of companies takes place only if there is a legal basis and this is necessary for one of the stated purposes.

It should be pointed out with respect to the data transfer to recipients outside of the organization, that we are obliged to professional confidentiality as an auditing company and that we also fulfil the requirements of the valid data protection regulations. We are only entitled to transfer Personal Data, if this is required by statutory regulations, if you have consented or if we are authorized to supply information.

Possible recipients of Personal Data under these conditions, e.g.:

- Public bodies and institutions (e.g. tax authorities, social insurance carriers, courts) in case a statutory or administrative obligation exists
- Contract processors engaged within the scope of the services rendered by us contributing to the fulfilment of contractual obligations, e.g. data centre service providers, EDP partners, document shredders etc.. Contract processors engaged by us are contractually obliged by us to fulfil the data protection requirements as well as to meet the professional confidentiality obligations.

Further recipients of data may be those bodies/institutions, for which you have granted to us the consent for data transmission.

### 5. Transfer of Data to a Third Country

A data transfer to bodies/institutions etc. in countries outside the European Union (so-called third countries) will be made, insofar as

- it is required to execute your orders
- it is required by law (e.g. obligation for notification under tax law) or
- if you had given us your consent

## 6. Data Storage

We will process and store Personal Data as long as this is required to fulfil our contractual and statutory obligations, in general as long as the contractual relationship exists. It should be taken into account, that our business relations are usually continuing obligations lasting for several years.

Furthermore, we are subject to various different obligations for retention and documentation requirements resulting, inter alia, from the HGB (German Commercial Code) and the AO (German Tax Code). The periods of retention specified in these laws for retention and documentation amount to two to ten years.

Finally, the period of retention will also be subject to the statutory limitation periods, which may amount, according to the BGB (German Civil Code) to up to thirty years, whereby the regular statutory limitation period amounts to three years.

Upon the expiration of the statutory limitation periods and/or the cessation of our legitimate interests, the data will be erased.

## 7. Data Protection Rights

Each data subject has the right to information, the right to correction, the right to erasure, the right to the restriction of processing, the right for objection as well as the right to data portability. In addition, the data subject has the right to lodge a complaint with a data protection authority.

A consent granted to us for the processing of Personal Data can be revoked towards us at any time. Such a revocation will, however, only become effective for the future. Any processing carried out before the revocation will not be affected.

## 8. Obligation to Provide Information

Within the scope of the business relations, those Personal Data must be provided, which are required for the start and performance of the business relations as well as for the fulfilment of the relevant contractual obligations or for which a statutory obligation for collection exists. We will usually not be able without such data to conclude the contract with you or to perform such contract.

In particular, we are obliged in accordance with the regulations of the Money Laundering Act to carry out an identity check by way of your identity document before establishing the business relations and to thus collect and record name, place of birth, date of birth, citizenship, address as well as the data of the identity document. In order to be able to fulfil these statutory obligations, you are obliged to provide to us the required information and documents pursuant to the Money Laundering Act and to immediately notify to us any changes in the course of the business relations.

## 9. Automated Decision-Making

We generally do not use any fully automatic decision-making. If we should use such procedures in individual cases, we will inform you separately, if this is required by law.

### Information about your right to object pursuant to Article 21 GDPR

You have the right to object, on grounds relating to your particular situation, at any time to the processing of personal data concerning you, which is based on data processing in the public interest, or on the basis of the balancing of interests; this also applies for profiling as defined in GDPR.

If you do object, we will no longer process your personal data unless we have compelling justified reasons for such processing that take precedence over your interests, rights and freedom or, alternatively, such processing serves to assert, exercise or defend legal claims.

Such objection should be addressed to the Controller mentioned above.