



## **DATA PROTECTION NOTICE**

### **of Jung Papier GmbH**

Jung Papier GmbH takes the protection of your personal data very seriously. Your personal data will be kept confidential and be processed in accordance with legal data protection requirements—in particular Regulation (EU) 2016/679 (General Data Protection Regulation) (“**GDPR**”), the German Federal Data Protection Act (“**BDSG**”) and the German Telecommunications Telemedia Data Protection Act (“**TTDSG**”).

### **1. CONTROLLER**

This data protection notice applies to the processing of personal data by Jung Papier GmbH as the controller.

#### **1.1. Contact details of the controller**

Jung Papier GmbH  
Kappeler Straße 51  
40597 Düsseldorf  
Germany

Tel: (0211) 9966-165 / +49 211 9966-165  
Email: [info@hakle.de](mailto:info@hakle.de)

#### **1.2. Contact details of the data protection officer**

Jung Papier GmbH  
Attn: Data Protection Officer  
Kappeler Straße 51  
40597 Düsseldorf  
Germany

Tel.: (0211) 9966-153 / +49 211 9966-153  
Email: [datenschutz@hakle.de](mailto:datenschutz@hakle.de)

### **2. PURPOSES, ORIGIN AND LEGAL BASIS**

Your personal data will be processed for the following purposes:

#### **2.1. Website**





When you access our website, your computer automatically sends information to our server, in particular the IP address of your computer/internet connection, browser type and version, etc. This information is only used to provide the website and is not normally retained.

However, we reserve the right to retain data, including the IP address, if there is a specific reason, such as in particular a suspected ongoing or imminent cyberattack, for the purpose of ensuring the operability of the website and for the assertion, exercise or defence of legal claims, including the involvement of law enforcement authorities. In this case, data that is not relevant for the aforementioned purposes will normally be deleted after seven days at the latest.

The legal basis is our legitimate interest (Article 6(1)(f) of the GDPR) in being able to provide you with information on the internet. The use of the data is also in accordance with the TTDSG.

If you do not want your IP address to be processed by the website, you can use an anonymisation services or VPN services.

Except as stated above, the general use of our website is generally possible without providing personal data. Insofar as personal data (e. g., name, address or e-mail addresses) are collected, this is done as indicated below for the below purposes.

## **2.2. Suppliers, service providers and customers**

We use personal data from suppliers, service providers, and customers to enter into and perform contracts and orders. We also use personal data to initiate new business relationships and to send advertisements for our company.

We usually receive the data from yourself or from the company you work for. In order to perform the contract, it may also be necessary to process personal data that we have received from other companies or other third parties, e. g., tax offices, your business partners or similar sources for the respective purpose. Furthermore, we may process personal data from publicly accessible sources such as websites, which we may use in accordance with data protection laws and only for the respective purpose of the contract.

If you are the supplier, service provider or customer, the legal basis is that the processing is necessary for entering into or performing a contract with you (Article 6(1)(b) of the GDPR). If you are a contact person for the supplier, service provider or customer, the legal basis is our legitimate interest (Article 6(1)(f) of the GDPR) in being able to communicate with our contract partners.

We store the data for as long as is necessary for the performance of the contract or during an ongoing business relationship, and beyond that six months until six months after the expiry of the statutory limitation period. This is usually three years at the end of the calendar year. Insofar as further statutory retention obligations exist, data is also



stored until their expiry. These regular retention obligations currently go to up to ten years.

The legal basis for the initiation of business relationships and advertising that is not aimed at a concrete conclusion of a contract is our legitimate interest (Article 6(1)(f) of the GDPR) in making our company known. For this purpose, we store data that is necessary for contacting us for up to three years after collection, or after the last contact.

### **2.3. Contact by telephone, email, fax or post**

If you contact us by email, telephone or post, your contact information (name, email address, postal address, etc.) will be collected and used to respond to your enquiry or to process your request. The same applies if you provide us with your data during a personal contact.

The legal basis is our legitimate interest (Article 6(1)(f) of the GDPR) in being able to respond to your enquiries. If you are a supplier, service provider or customer of ours, the legal basis is that the processing is necessary for entering into or performing a contract with you (Article 6(1)(b) of the GDPR). If you are a contact person for a supplier, service provider or customer, the legal basis is our legitimate interest (Article 6(1)(f) of the GDPR) in being able to communicate with contractual partners.

In the case of enquiries concerning the establishments or exercise of claims, the data will be stored until six months after the expiry of the statutory limitation period; otherwise, the data will be stored for a period of one year after your last enquiry. Insofar as statutory retention obligations exist, data is also stored until their expiry. These regular retention obligations currently go to up to ten years.

### **2.4. Legal obligation**

We also process your personal data where required by law, in particular by anti-money laundering (AML) and counter-terrorist financing (CTF) regulations.

The legal basis for this is the respective legal obligation (Article 6(1)(c) of the GDPR).

### **2.5. Our whistleblower system**

Compliance with the applicable regulations in the laws and guidelines of the corporate guidelines applicable to Jung Papier GmbH is extremely important to us, because we can only protect our company, our employees and business partners through honest and compliant behaviour and thus protect them from damage.

For this reason, we have set up a whistleblower portal, which you can find at <https://jungpapier.de/hinweisgeberportal>.





### 3. RECIPIENTS

Within our company, access to the personal data you have provided will only be given to those organizational units that need it to fulfil contractual and legal obligations and that have been granted authorisation to process this data.

We also share personal data with the following other recipients:

- service providers and other contractors we use to provide services, such as transport companies, postal services and telecommunications service providers;
- Tax, legal and other advisors; as well as
- processors who provide technical services, e. g., data centre service operators, content delivery networks, IT service providers, document shredding contractors, etc. These processors are contractually bound by us to comply with the data protection requirements.

Apart from that, we will disclose the data only to those recipients that require it for legal reasons, e. g., financial authorities, social insurance institutions, competent authorities and courts.

### 4. TRANSFER TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS

We use the Amazon CloudFront content delivery network provided by Amazon Web Services EMEA SARL ("**AWS**"), Luxembourg. In this context, your personal data, in particular your IP address, may be processed by AWS or its affiliates in third countries (outside the European Union and the European Economic Area) when you access our website. This may be the case in particular if you are already in a third country and access our website from there.

The protection of your personal data will be ensured either by the laws of the respective third country (the suitability of which has been determined in an adequacy decision of the European Commission) or by contractual agreements (on the basis of the standard contractual clauses approved by the European Commission). You can access the standard contractual clauses with AWS yourself at [https://d1.awsstatic.com/Controller\\_to\\_Processor\\_SCCs.pdf](https://d1.awsstatic.com/Controller_to_Processor_SCCs.pdf) or request a copy from us.

In general, the data you provide will not otherwise be transferred to a third country or an international organisation. If, in specific situations, a transfer to third countries is necessary (e. g. because you live outside the European Economic Area or maintain your email account with a provider outside the European Economic Area), this will only take place in the cases provided for in Article 49 of the GDPR.



## 5. AUTOMATED DECISION-MAKING, INCLUDING PROFILING.

No fully automated decision-making (including profiling) (cf. Article 22 of the GDPR) is used to process the data you have provided.

## 6. YOUR RIGHTS

According to the GDPR, you have the following rights. To exercise these rights, you may contact our data protection officer (see above for contact details).

### 6.1 Access (Article 15 of the GDPR)

You have the right, upon request and free of charge, to receive information as to whether and which data about you is being processed and for what purpose it is being processed.

### 6.2 Rectification (Article 16 of the GDPR)

You have the right to obtain without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purpose of the processing, you also have the right to have incomplete personal data completed, including by means of a supplementary statement.

### 6.3 Erasure (“right to be forgotten”) (Article 17 of the GDPR)

You have the right to obtain the erasure of personal data concerning you without undue delay. We will delete personal data immediately if one of the following reasons applies:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) you withdraw your consent to the processing, where there is no other legal ground for the processing;
- c) you object to the processing, where there is no other legal ground for the processing;
- d) the personal data have been unlawfully processed;
- e) the personal data have to be erased for compliance with a legal obligation in EU or Member State law; or
- f) the personal data have been collected in relation to information society services offered pursuant to Article 8(1) of the GDPR.





#### **6.4 Restriction (Article 18 of the GDPR; Section 35 of the BDSG)**

You have the right to obtain restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by you;
- b) the processing is unlawful but you oppose the erasure and request restriction instead;
- c) The personal data are no longer needed for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims;
- d) you have objected to the processing pursuant to Article 21(1) of the GDPR, pending the verification whether the legitimate grounds on our side override those of you.

#### **6.5 Data portability (Article 20 of the GDPR)**

You have the right to receive the personal data concerning you, which you have provided, and which are processed on the basis of your consent or on the basis of a contract, in a structured, commonly used and machine-readable format. We cannot hinder a transfer to another controller.

#### **6.6 Withdrawal of consent (Article 7(2) of the GDPR)**

If we process data on the basis of your consent, you have the right to revoke this consent at any time. This does not affect the lawfulness of processing based on consent until then.

#### **6.7 Right to object (Article 21 of the GDPR)**

You also have the right to object to a processing for legitimate interests (Article 6(1)(f) GDPR) on grounds relating to your particular situation. However, we may also continue processing in this case if there are compelling legitimate grounds for doing so which override your interests, rights and freedoms, or for the establishment, exercise or defence of legal claims.

Irrespective of this, you can object to the use of your data for direct advertising at any time.

#### **6.8 Right of appeal (Article 38(4) of the GDPR, Article 77 of the GDPR)**

You also have the right to contact our data protection officer (see above for contact details) at any time if you have any questions, complaints or other concerns regarding the processing of personal data by us.





In addition, you have the right to lodge a complaint with the competent supervisory authority:

State Commissioner for Data Protection and Freedom of Information of North Rhine-Westphalia  
PO Box 200444  
40102 Düsseldorf  
Germany

Tel: (0211) 38424-0 / +49 211 38424-0  
Fax: (0211) 38424-10 / +49 211 38424-10  
Email: [poststelle@ldi.nrw.de](mailto:poststelle@ldi.nrw.de)

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