

Pattern privacy protection policies according to the GDPR

NORDWEST Handel AG

<https://www.nordwest-promat.com>

A. Privacy policies according to the GDPR

I. Name and address of the person responsible

The person responsible within the meaning of the basic data protection regulation and other national data protection laws of the member states as well as other data protection regulations is the:

*NORDWEST Handel AG
Robert-Schuman-Straße 17
44263 Dortmund
Deutschland
Tel.: +49 231 2222 3001
Fax: +49 231 2222 3099
E-Mail: info@nordwest.com
Website: <https://www.nordwest.com>*

II. Name and address of the data protection officer/supervisor

The data protection officer/supervisor of the responsible person is:

*dataarea GmbH
Meißner Straße 103
01445 Radebeul
Deutschland
Tel.: 0351 20 25 14 26
E-Mail: info@dataarea.de
Website: www.dataarea.de*

III. General information about data processing

1. Extent of processing of personal data

In principle, we process personal data of our users only insofar as this is necessary to provide a functioning website and our content and services. The processing of personal data of our

users takes place regularly only with the consent of the user. An exception applies to cases in which prior consent can not be obtained for reasons of fact and the processing of the data is permitted by law.

2. Legal basis for the processing of personal data

Insofar as we obtain the consent of the data subject for processing of personal data, Art. 6 para. 1 lit. a EU General Data Protection Regulation (GDPR) is the legal basis.

If the processing of personal data is necessary for the fulfillment of a contract to which the data subject is a party, Art. 6 para. 1 lit. b GDPR is the legal basis. This also applies to processing operations required to carry out pre-contractual actions.

Provided that processing of personal data is required to fulfill a legal obligation that is subject to our company, Art. 6 para. 1 lit. c GDPR is the legal basis.

In the event that vital interests of the data subject or another natural person require the processing of personal data, Art. 6 para. 1 lit. d GDPR is the legal basis.

If processing is necessary to safeguard the legitimate interests of our company or a third party, and if the interests, fundamental rights and freedoms of the data subject do not prevail over the first interest, Art. 6 para. 1 lit. f GDPR is the legal basis for processing.

3. Data deletion and storage duration

The personal data of the data subject will be deleted or blocked as soon as the purpose of the storage is omitted.

Blocking or deletion of the data also takes place when a storage period prescribed by the standards mentioned expires, unless there is a need for further storage of the data for conclusion of a contract or fulfillment of the contract. In addition, the storage may be continued if it is obligated by any EU or national regulations, laws or other regulations to which the controller is subject.

IV. Provision of the website and creation of logfiles

1. Extent of processing of personal data

Each time our website is accessed, our system automatically collects data and information from the computer system of the requesting computer.

The following data are collected:

- (1) Information about the browser type and version used
- (2) The operating system of the user
- (3) The Internet service provider of the user
- (4) The IP address of the user
- (5) Date and time of access
- (6) Websites from which the system of the user comes to our website
- (7) Web sites accessed by the user's system through our website
- (8) Name and URL of the retrieved file
- (9) Message if the retrieval was successful

The data is also stored in the log files of our system. A storage of this data together with other personal data of the user does not take place.

2. Legal basis for the processing of personal data

The legal basis for the temporary storage of data and log files is Art. 6 para. 1 lit. f GDPR.

3. Purpose for the processing or forwarding of personal data

The temporary storage of the IP address by the system is necessary to enable the retrieval of the website on the computer of the user. To do this, the user's IP address must be kept for the duration of the session.

Storage in log files is done to ensure the functionality of the website. In addition, the data is used to optimize the website and to ensure the security of our information technology systems. An evaluation of the data for marketing purposes does not take place in this context.

For these purposes, this is our legitimate interest in the processing of data according to Art. 6 para. 1 lit. f GDPR.

4. Duration of storage

The data will be deleted as soon as it is no longer necessary for the purpose of its collection. In the case of collecting the data for providing the website, this is the case when the respective session is completed.

In the case of storing the data in log files, this is the case after no more than seven days. An additional storage is possible. In this case, the IP addresses of the users are deleted or alienated, so that an assignment of the calling client is no longer possible.

5. Objection and removal possibility

The collection of data for the provision of the website and the storage of the data in log files is essential for the operation of the website. There is consequently no contradiction on the part of the user.

V. Use of cookies

a) Extent of processing of personal data

Our website uses cookies. Cookies are text files that are stored in the Internet browser or the Internet browser on the user's computer system. When a user visits a website, a cookie may be stored on the user's operating system. This cookie contains a characteristic string that allows the browser to be uniquely identified when the website is reopened.

We use cookies to make our website more user-friendly more indistinct. Some elements of ours Web page require that the calling browser also identifies after a page break.

The following data are stored in the cookies and transmits:

- (1) Languagesetting

In addition, we use cookies on our website that allow an analysis of users' browsing behavior.

In this way, the following data can be transmitted:

- (1) Entered search terms
- (2) frequency of page views
- (3) Use of Website Features
- (4) general surfing data
- (5) anonymized IP address

When accessing our website, the user is informed about the use of cookies for analysis purposes and his consent to the processing of the personal data used in this context is obtained. In this context, there is also a reference to this privacy policy.

b) Legal basis for the processing of personal data

The legal basis for the processing of personal data using cookies for analysis purposes is the consent of the user Art. 6 para. 1 lit. a GDPR.

c) Purpose for the processing or forwarding of personal data

The use of the analysis cookies is for the purpose of improving the quality of our website and its contents. Through the analysis cookies, we learn how the website is used and so we can constantly optimize our offer.

We require cookies for the following applications:

- (1) Transfer of language settings

The user data collected by technically necessary cookies will not be used for the creation of User profiles.

We use analysis cookies to analyze the surfing behavior of users, to advertise. In addition, an evaluation / reporting / analysis of user behavior. These measures are intended to optimize user behavior.

For these purposes, our legitimate interest in the processing of personal data pursuant to Art. 6 para. 1 lit. f DSGVO

e) Duration of storage, Objection and removal possibility

Cookies are stored on the computer of the user and transmitted by this on our side. Therefore, as a user, you have full control over the use of cookies. By changing the settings in your internet browser, you can disable or restrict the transmission of cookies. Already saved cookies can be deleted at any time. This can also be done automatically. If cookies are disabled for our website, it may not be possible to use all the functions of the website.

VI. e-mail contact

1. Extent of processing of personal data

On our website you can contact us via the provided e-mail address.

In this case, the user's personal data transmitted by e-mail will be stored.

In this context, there is no disclosure of the data to third parties. The data is used exclusively for processing the conversation.

2. Legal basis for the processing of personal data

Legal basis for the processing of the data is in the presence of the consent of the user Art. 6 para. 1 lit. a GDPR.

The legal basis for the processing of the data transmitted in the course of sending an e-mail is Article 6 (1) lit. f GDPR. If the e-mail contact aims to conclude a contract, then additional legal basis for the processing is Art. 6 para. 1 lit. b GDPR.

3. Purpose for the processing or forwarding of personal data

The processing of the personal data from the input mask serves us only to process the contact. In the case of contact via e-mail, this also includes the required legitimate interest in the processing of the data.

The other personal data processed during the sending process serve to prevent misuse of the contact form and to ensure the security of our information technology systems.

4. Duration of storage

The data will be deleted as soon as it is no longer necessary for the purpose of its collection. For the personal data from the input mask of the contact form and those sent by e-mail, this is the case when the respective conversation with the user has ended. The conversation is ended when it can be inferred from the circumstances that the relevant facts have been finally clarified.

The additional personal data collected during the sending process will be deleted at the latest after a period of seven days.

5. Objection and removal possibility

The user has the possibility at any time to revoke his consent to the processing of the personal data. If the user contacts us by e-mail, he may object to the storage of his personal data at any time. In such a case, the conversation can not continue.

All personal data stored in the course of contacting will be deleted in this case.

VII. Web analysis by Matomo (formerly Piwik)

1. Extent of processing of personal data

On our website we use the open-source software tool Matomo (formerly PIWIK) to analyze the surfing behavior of our users. The software sets a cookie on the computer of the users (for cookies see above). If individual pages of our website are accessed, the following data will be saved:

- (1) Two bytes of the IP address of the calling system of the user
- (2) The called website

- (3) The website from which the user came to the accessed website (referrer)
- (4) The subpages that are called from the called web page
- (5) The length of stay on the website
- (6) The frequency of calling the website

The software runs exclusively on the servers of our website. A storage of the personal data of the users takes place only there. A transfer of the data to third parties does not take place.

The software is set so that the IP addresses are not completely stored but 2 bytes of the IP address are masked (eg 192.168.xxx.xxx). In this way, an assignment of the shortened IP address to the calling computer is no longer possible.

2. Legal basis for the processing of personal data

The legal basis for processing users' personal data is Article 6 (1) lit. f GDPR.

3. Purpose for the processing or forwarding of personal data

The processing of users' personal data enables us to analyze the surfing behavior of our users. By analyzing the obtained data, we are able to compile information about the use of the individual components of our website. This helps us to constantly improve our website and its user-friendliness. For these purposes, our legitimate interest lies in the processing of the data according to Art. 6 para. 1 lit. f GDPR. The anonymisation of the IP address sufficiently takes into account the interest of users in their protection of personal data.

4. Duration of storage

The data will be deleted as soon as they are no longer needed for our recording purposes.

5. Objection and removal possibility

Cookies are stored on the computer of the user and transmitted by this on our side. Therefore, as a user, you have full control over the use of cookies. By changing the settings in your internet browser, you can disable or restrict the transmission of cookies. Already saved cookies can be deleted at any time. This can also be done automatically. If cookies are disabled for our website, it may not be possible to use all the functions of the website.

We offer our users the option of opting out of the analysis process on our website. For this you must follow the appropriate link. In this way, another cookie is set on your system,

which signals our system not to save the data of the user. If the user deletes the corresponding cookie in the meantime from his own system, he must set the opt-out cookie again.

For more information on the privacy settings of the Matomo software, see the following link: <https://matomo.org/docs/privacy/>.

VIII. Disclosure of personal data to third parties

1. Google Analytics

a) Extent of processing of personal data

This website uses Google Analytics, a web analytics service provided by Google (Google LLC, 1600 Amphitheater Parkway, Mountain View, CA 94043, USA). Google Analytics uses cookies that are stored on your computer and allow an analysis of their use. These are cookies from Google itself and so-called third-party cookies. The information generated by the cookies about your use of this website is usually transmitted to a Google server in the USA and stored there. For data processing compliant processing, we use the code "gat._anonymizeIp();" to ensure an anonymous collection of IP addresses (so-called IP masking).

b) Legal basis for the processing of personal data

Legal basis for the processing of personal data for the use of Google Analytics Art. 6 para. 1 lit. f GDPR. Legal basis for the processing of the data is in the presence of the consent of the user Art. 6 para. 1 lit. a GDPR.

c) Purpose for the processing or forwarding of personal data

This website uses Google Analytics to provide an analysis of its use. The processing of users' personal data enables us to analyze the surfing behavior of our users. By analyzing the obtained data, we are able to compile information about the use of the individual components of our website. This helps us to constantly improve our website and its user-friendliness. For these purposes, our legitimate interest lies in the processing of the data according to Art. 6 para. 1 lit. f GDPR. The anonymization of the IP address takes sufficiently account of users interest protecting their personal data.

d) Duration of storage

As a rule, the data collected are deleted as soon as they are no longer needed. A deletion takes place at the latest after 26 months.

e) Objection and removal possibility

Data collection can be objected to at any time with effect for the future by downloading and installing the browser add-on for disabling Google Analytics:

<https://tools.google.com/dlpage/gaoptout?hl=de>

2. Google Adwords Conversion-Tracking

a) Extent of processing of personal data

We also use the online advertising program Google AdWords Conversion Tracking. Google Conversion Tracking is an analytics service provided by Google Inc. (1600 Amphitheater Parkway, Mountain View, CA 94043, USA). When you click on an ad served by Google, a conversion tracking cookie will be placed on your machine.

These cookies do not contain any personal data.

b) Legal basis for the processing of personal data

Legal basis for the processing of the data is Art. 6 para. 1 lit. a GDPR.

c) Purpose for the processing

The information gathered through the conversion cookie is used to generate conversion statistics (such as the total number of users who clicked on an ad, the Conversion Tracking Tag page forwarded). However, no personal user profiles can be created.

d) Duration of storage

The cookies used by Google Adwords lose their validity after 30 days.

e) Objection and removal possibility

If you do not want to participate in the tracking, you can refuse the required setting of a cookie - for example via a browser setting that generally disables the automatic setting of cookies or sets your browser to block cookies from the domain "googleleadsservices.com".

IX. Rights of the data subject

If your personal data is processed, you are a person concerned within the meaning of the GDPR and you have the following rights towards the person responsible:

1. Right of access by the data subject

You have the right to request a confirmation from the person in charge if personal data concerning you are processed by us.

If such processing is done, you can request information from the person responsible about the following information:

- (1) the purposes for which personal data are processed;
- (2) the categories of personal data being processed;
- (3) the recipients or categories of recipients to whom the personal data relating to you have been disclosed or are still being disclosed;
- (4) the planned duration of storage of personal data concerning you or, if specific information is not available, criteria for determining the retention period;
- (5) the existence of a right to rectification or erasure of personal data concerning you, a right for restriction of processing by the controller or a right to object the processing;
- (6) the existence of a right of appeal to a supervisory authority;
- (7) all available information on the source of the data if the personal data is not collected from the data subject;
- (8) the existence of automated decision-making including profiling under Article 22 (1) and (4) GDPR and, at least in these cases, meaningful information about the logic involved, and the scope and intended impact of such processing on the data subject.

You have the right to request information about whether your personal information relates to a third country or an international organization. In this connection, you can request the appropriate guarantees in accordance with Art. 46 GDPR in connection with the transfer.

2. Right to rectification

You have a right to rectification and / or completion to the person in charge, if the personal data you process is incorrect or incomplete. The responsible person must correct the Data without delay.

3. Right to restriction of processing

You can request the restriction of the processing of your personal data under the following conditions:

- (1) if you contest the accuracy of your personal information for a period of time that enables the controller to verify the accuracy of your personal information;
- (2) the processing is unlawful and you refuse the deletion of the personal data and instead demand the restriction of the use of the personal data;
- (3) the controller no longer needs the personal data for the purposes of processing, but you need it to assert, exercise or defend legal claims; or
- (4) if you have objected to the processing pursuant to Art. 21 (1) GDPR and it is not yet certain whether the legitimate reasons of the person responsible outweigh your reasons.

If the processing of personal data concerning you has been restricted, this data may only be used with your consent or for the purpose of asserting, exercising or defending legal claims or protecting the rights of another natural or legal person or for reasons of important public interest of the Union or a Member State.

If the limitation of the processing after the o.g. conditions are restricted, you will be informed by the person in charge before the restriction is lifted.

4. Right to erasure

a) deletion of data

You may require the controller to delete your personal information without delay, and the controller is liable to delete that information immediately if one of the following is applicable:

- (1) Personal data concerning you are no longer necessary for the purposes for which they were collected or otherwise processed.
- (2) You revoke your consent, to which the processing acc. Art. 6 para. 1 lit. a or Art. 9 para. 2 lit. GDPR and there is no other legal basis for processing.
- (3) you have objected according to Art. 21 para. 1 GDPR the processing and there are no prior justifiable reasons for the processing, or you objected acc. Art. 21 para. 2 GDPR the processing.
- (4) Your personal data have been processed unlawfully.
- (5) The deletion of personal data concerning you shall be required to fulfill a legal obligation under Union law or the law of the Member States to which the controller is subject.
- (6) The personal data concerning you were collected in relation to information society services offered pursuant to Art. 8 (1) GDPR.

b) Information to third parties

If the person in charge has made the personal data concerning you public and is acc. to Art. 17 (1) of the GDPR laible to delete the data, it will take appropriate measures, including technical ones, taking into account available technology and implementation costs, to inform data controllers who process the personal data, that you, the affected person, have requested that the Data has to be deleted. This includes all links to such personal information or copies or replications of such personal information.

c) Exceptions

The right to erasure does not exist if the processing is necessary

- (1) to exercise the right to freedom of expression and information
- (2) to fulfill a legal obligation required by the law of the Union or of the Member States to which the controller is subject, or to carry out a task of public interest or in the exercise of official authority conferred on the controller;
- (3) for reasons of public interest in the field of public health pursuant to Art. 9 (2) lit. h and i and Art. 9 (3) GDPR;
- (4) for archival purposes of public interest, scientific or historical research purposes or for statistical purposes acc. Article 89 (1) GDPR, to the extent that the law referred to in subparagraph (a) is likely to render impossible or seriously affect the achievement of the objectives of that processing, or to assert, exercise or defend legal claims.

5. Right to be informed

If you have the right of rectification, erasure or restriction of processing to the controller, he / she is obliged to notify all recipients to whom your personal data have been disclosed of this correction or deletion of the data or restriction of processing, unless: this proves to be impossible or involves a disproportionate effort.

You have a right to the person responsible to be informed about these recipients.

6. Right to data portability

You have the right to receive personally identifiable information you provide to the controller in a structured, common and machine-readable format. In addition, you have the right to transfer this data to another person without hindrance by the person responsible for providing the personal data, provided that

- (1) the processing on a consent acc. Art. 6 para. 1 lit. a GDPR or Art. 9 para. 2 lit. a GDPR or on a contract acc. Art. 6 para. 1 lit. b GDPR is based and

(2) the processing is done by automated means.

In exercising this right, you also have the right to obtain that your personal data relating to you are transmitted directly from one person to another, insofar as this is technically feasible. Freedoms and rights of other persons may not be affected.

The right to data portability does not apply to the processing of personal data necessary for the performance of a task in the public interest or in the exercise of official authority delegated to the controller.

7. Right of objection

You have the right at any time, for reasons that arise from your particular situation, to object the processing of your personal data, which is pursuant to Art. 6 para. 1 lit. e or f GDPR; this also applies to profiling based on these provisions.

The controller will no longer process the personal data concerning you unless he can demonstrate compelling legitimate reasons for processing that outweigh your interests, rights and freedoms, or the processing is for the purpose of enforcing, exercising or defending legal claims.

If the personal data relating to you are processed for direct marketing purposes, you have the right to object at any time to the processing of your personal data for the purpose of such advertising; this also applies to profiling insofar as it is associated with such direct mail.

If you object the processing for direct marketing purposes, your personal data will no longer be processed for these purposes.

Regardless of Directive 2002/58 / EC, you have the option of exercising your right to object to the use of Information Society Services. The revocation of consent will be used on the basis of the consent until the revocation.

8. Right to revoke the data protection consent declaration

You have the right to revoke your data protection declaration at any time. The revocation of consent does not affect the legality of the processing carried out on the basis of the consent until the revocation.

9. Automated decision on a case-by-case basis, including profiling

You have the right not to be subjected to a decision based solely on automated processing - including profiling - that will have legal effect or similarly affect you in a similar manner. This does not apply if the decision

- (1) is required for the conclusion or performance of a contract between you and the controller,
- (2) is permitted by the Union or Member State legislation to which the controller is subject, and where such legislation contains appropriate measures to safeguard your rights and freedoms and legitimate interests, or
- (3) with your express consent.

However, these decisions must not be based on special categories of personal data under Art. 9 (1) GDPR, unless Art. 9 (2) lit. a or g GDPR applies and reasonable measures have been taken to protect the rights and freedoms as well as your legitimate interests.

With regard to the cases referred to in (1) and (3), the person responsible shall take appropriate measures to uphold the rights and freedoms and their legitimate interests, including at least the right to obtain the intervention of a person by the controller, to express his / her own position and heard on challenge of the decision.

10. Right to complain to a supervisory authority

Without prejudice to any other administrative or judicial remedy, you shall have the right to complain to a supervisory authority, in particular in the Member State of its residence, place of work or place of alleged infringement, if you believe that the processing of the personal data concerning you is against the GDPR violates.

The supervisory authority to which the complaint has been submitted shall inform the complainant of the status and results of the complaint, including the possibility of a judicial remedy pursuant to Article 78 of the GDPR.

The competent supervisory authority is:

Landesbeauftragte für Datenschutz und Informationsfreiheit
Nordrhein-Westfalen
Postfach 20 04 44
40102 Düsseldorf
Tel.: 0211/38424-0
Fax: 0211/38424-10
E-Mail:
poststelle@ldi.nrw.de