

## Information on Data Protection

### Our Privacy Policy

This is information for your relating to the handling of your personal data after the conclusion of a contract. Your contract partner and the entity responsible for the processing of personal data is:

*Novem Group S.A. | 19, rue Edmond Reuter | 5326 Contern | Luxembourg  
P. +352 44 30 64 | [info@novem.com](mailto:info@novem.com)*

*Novem Group GmbH | Industriestrasse 45 | 95519 Vorbach | Germany  
P. +49 9205 18 0 | [info@novem.com](mailto:info@novem.com)*

*Novem Beteiligungs GmbH | Industriestrasse 45 | 95519 Vorbach | Germany  
P. +49 9205 18 0 | [info@novem.com](mailto:info@novem.com)*

*Novem Car Interior Design GmbH | Industriestrasse 45 | 95519 Vorbach | Germany  
P. +49 9205 18 0 | [info@novem.com](mailto:info@novem.com)*

*Novem Car Interior Design Metalltechnologie GmbH | Gossenstrasse 51 | 92676 Eschenbach | Germany  
P. +49 9645 6017 2403 | [info@novem.com](mailto:info@novem.com)*

*Novem Car Interior Design S.p.A. Bergamo | Via delle Groane, 10 | 24060 Bagnatica (BG) | Italy  
P. +39 035 666 4111 | [infoIT@novem.com](mailto:infoIT@novem.com)*

*Novem Car Interior Design d.o.o. | Ložnica pri Žalcu 53a | 3310 Žalec | Slovenia  
P. +386 (3) 713 5400 | [infoSI@novem.com](mailto:infoSI@novem.com)*

*NOVEM Car Interior Design k.s. | Líšřanská 520 | 330 33 Město Touřkov/Pilsen | Czech Republic  
P. +420 378 015 733 | [infoCZ@novem.com](mailto:infoCZ@novem.com)*

You may as well ask our data protection officer questions on data privacy at any time:

*legal data Schröder Rechtsanwaltsgesellschaft mbH | Dr. Georg F. Schröder, LL.M.  
Prannerstrasse 1 | 80333 München | Deutschland  
P. +49 89 954 597 520 | E-Mail: [Georg.Schroeder\(at\)legaldata.law](mailto:Georg.Schroeder(at)legaldata.law)*

### Collection of data, purpose of processing and legal bases

When concluding the contract we collect personal data about you, e.g. name and surname, address, email address or phone number. We use this data only for fulfilling our contractual obligations. For example we use your address for sending you the product you have ordered or your email address to contact you when necessary.

The legal basis for processing the Data is the fulfilling of the contract with you according to Art. 6 (1) (b) General Data Protection Regulation. If you consent Art. 6 (1) (a) General Data Protection Regulation is a further legal basis.

### Transfer of Data to processors

In processing the Data, we make use of assistants, particularly in the realm of IT. Those assistants process the Data as so-called processors, i.e. on the basis of a written contract governing the details of the data processing, by which the processor undertakes to handle the Data with due care. Data processing by contract will, for example, occur where we store Data in an external data centre.

We use processors of this kind in the following areas:

- IT
- Sales
- Purchasing

### Other Transfers

We transfer personal data to external agencies to meet our contractual or legal obligations. By law we are required to transfer data to governmental authorities, e.g. tax authorities, regulators and law enforcement agencies.

When transferring data to external agencies in third countries, i.e. outside the EU and/or the EEA, we make sure that these agencies handle personal data with the same care as within the EU and/or the EEA. We transfer personal data only to third countries, where the EU Commission has decided that it ensures an adequate level of protection. If there is no adequacy decision by the EU Commission we ensure handling of the personal data with due care with contracts or other appropriate safeguards.

### Storing Period

We process and store your data only for as long as it is required to fulfill our contractual obligations. Once the purpose of processing no longer exists, your data will be blocked or erased. If there are any additional statutory duties to store the data, we block or erase your data upon the lapse of the statutory storing periods.

### Your Rights

You have the following statutory rights against us relating to your personal data. You can find details about your rights in Articles 15-21 of the General Data Protection Regulation.

#### 1. Right to be informed

As the data subject (affected person), you have the right to obtain a confirmation on whether we process personal data concerning you. If this is the case, you have the right to be informed of such personal data as well as to further information, e.g. the purpose of the processing, the recipients and the envisaged storing period or the criteria for the determination of such period, respectively.

#### 2. Right to rectification and completion

As the data subject, you have the right to request the immediate rectification of incorrect data. Taking into consideration the purposes of the processing, you have the right to request the completion of incomplete personal data.

#### 3. Right to erasure (“right to be forgotten”)

As the data subject, you have the right to obtain the erasure if processing is not necessary. This is the case e.g. if your data are no longer required for the original purposes, if you withdrew your statement of consent relating to data privacy, or if the data have been processed unlawfully.

#### 4. Right to restriction of processing

As the data subject, you also have the right to restriction of the processing if e.g. you think that the personal data would be incorrect.

**5. Right to data portability**

As the data subject, you have the right to receive your personal data in a structured, commonly used and machine-readable format.

**6. Right to object**

As the data subject, you have the right to object against the processing of your personal data at any time on grounds relating to your situation.

In case of direct marketing, you as the data subject have the right to object against the processing of your personal data for the purpose of such marketing at any time; this also applies to the profiling related to such direct marketing.

**7. Right to withdraw your consent relating to data privacy**

You may withdraw a consent to the processing of your personal data with effect in the future at any time. The legality of the processing made until such withdrawal, however, is not affected by the foregoing.

Moreover, you may lodge complaint with a data protection supervisory authority, e.g. if you feel that the data processing does not comply with data protection regulations.