

## Privacy policy

### Guidelines for the implementation of the General Data Protection Regulation (GDPR)

#### 1. Foreword

These Guidelines shall, in addition to the IT Security Strategy, ensure the protection of personal data and guarantee proper use in accordance with the GDPR. They define what personal data is, the purpose for which it is to be used, how it is to be handled, how it is to be protected, when it is to be stored and when it is to be erased.

#### 2. Scope

These Guidelines apply to all personal data processed within the company, both electronically and in writing.

#### 3. Personal data

Personal data is information about a particular or an identifiable natural person. An identifiable natural person is a person who can be identified, directly or indirectly, by means of a certain characteristic. A characteristic may be, for example, an address or specific information about the physical, physiological, genetic, mental, economic, cultural or social identity of this natural person.

Data which has been anonymised or summarised ("aggregated") and can no longer be used to identify a particular natural person, regardless of whether it is used in combination with other data or in any other way, is not regarded as personal data. In addition, all data which is publicly accessible (e.g. name, department, delivery address, etc.), is not considered to be personal data either.

Two types of personal data are processed at TFT: firstly, the internal data of our employees, and secondly, the external data of our customers and suppliers.

#### 4. Purpose

We collect and store the data of our employees, so that we can have all the information necessary for wage and salary payment, as well as for taxation, insurance and other processes required in employment. Furthermore, it is used to ascertain a person's qualifications for the purpose of recruitment and training/further training. We need to be able to contact our employees via post or telephone for the purpose of sending important documents and information while they are absent from work.

We collect and store our customers' and suppliers' data, so that we can offer our services, which range from product consultation and issues that arise during the process to the production and delivery of our products. In addition, we also need this data to allow us to answer queries, e.g. concerning deliveries that have already been made or queries of general nature.

In addition, we send appropriate product information or offers based on this data. If our customers do not wish to receive this information, they can object to this point at any time, without the service being restricted in any way.

#### 5. Handling

Generally speaking, our data subjects have a right of access, rectification, erasure and restriction of the use of their personal data. To fulfil this right, every data subject is provided with a copy of his or her data upon request, in a structured, standard and machine-readable format. If the data is incorrect or incomplete, the data subject has the right to obtain rectification or completion the data from us. The company keeps all data up-to-date and verifies its accuracy to the best of its ability.

No personal data is passed on to internal or external third parties who are not directly connected with the purpose for which this data is being used.

#### 6. Collection and deletion of data

When it comes to our employees, data is collected when they enter employment and is added to during the course of the employment relationship, if necessary. Customers' or suppliers' data is collected at the beginning of the collaboration and is also added to if required.

To ensure that the data subjects are made aware of the storage and deletion of the data, we expressly inform them in writing.

Any data collected that does not result in a business or employment relationship will be erased after two years. In addition, the data subject has the right to object to the processing of his or her personal data or to restrict its use (there may be some limitations to this). Furthermore, the data will be erased two years after the employment or business relationship comes to an end. If statutory retention periods stipulate a longer storage period, the data in question must continue to be stored and can only be erased after expiry of the retention period.

## 7. Protection

Written documents must be kept beyond the reach of third parties and must always be held under lock and key. These documents must be disposed of exclusively in safety containers provided for that purpose or shredded to make them unrecognisable.

Data in electronic form must be protected in accordance with the IT Security Strategy.

## 8. Publication

All employees shall be informed about these Guidelines at the time of entering employment and they are responsible for the implementation of the Guidelines in their areas of work. Furthermore, the company shall ensure that the employees receive training on current or new issues at regular intervals.

External employees who work for the TFT on a regular basis shall also be informed about the contents and the implementation of these Guidelines.

Customers and suppliers shall be informed about the Guidelines at the beginning of a commercial relationship, and will be informed once again if they are updated. In addition, these Guidelines can be accessed online any time as well as in written form, upon request.

## 9. Contact person

If you have any unresolved concerns regarding data protection or data use, or in case of questions about personal data and its handling, you can get in contact with Thüringer Fiber-Trommel GmbH data protection officer.

If you have any doubts about the accuracy or the meaningfulness of instructions issued by the data protection officer, the management of the company can also be consulted.

Data protection officer:        Ms. Krahl        (034498 456) – 67