

Data Protection Notice for Business Contacts

From: Wuerth Elektronik Stelvio Kontek S.p.A.
To: all the business contacts
Date of issue: May 2018
Revision: 05 February 2019
Subject: Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

This notice provides you with an overview of the processing of your personal data and your rights as pursuant to the General Data Protection Regulation (GDPR) of the European Union. You can find it also at: <https://www.stelvio-kontek.com/privacy/businesscontact-italy>

1. Identity of the Data Protection Controller

The body responsible for data processing:

Name: Wuerth Elektronik Stelvio Kontek S.p.A.
Street: via Al Mognago, 49
Location: 23848 Oggiono (LC) - ITALY

2. Contact data of the Data Protection Officer

Considering that, Wuerth Elektronik Stelvio Kontek S.p.A.:

- is not a public authority or body
- the core activities of the controller or the processor doesn't consist of processing operations which, by virtue of their nature, their scope and/or their purposes, require regular and systematic monitoring of data subjects on a large scale
- the core activities of the controller or the processor doesn't consist of processing on a large scale of special categories of data pursuant to Article 9 or personal data relating to criminal convictions and offences referred to in Article 10
- does not fall within the categories referred to in Article 37, paragraph 1 of the GDPR Rules

and that Wuerth Elektronik eiSos appointed a DPO, who is reference for the companies which belong to the Group, we decide to not appoint any Data Protection Officer. Nevertheless, for questions and information pertaining to the handling of your personal data, please contact the Data Protection Coordinator of Würth Elektronik Stelvio Kontek S.p.A. at any time.

Role: Data Protection Coordinator
Street: via Al Mognago, 49
Location: 23848 Oggiono (LC) ITALY
Phone: 0039 0341 - 264.468
e-mail: protezione-dei-dati@stelvio-kontek.com

3. Collection and processing of your data provided by you - purpose and legal basis

We collect and process your data for the purpose of initiating a contractual relationship and processing orders. The legal basis for the processing of your data is Article 6 (1) lit. b) GDPR (prior to entering into a contract or necessary for the performance of a contract).

In addition, we use your contact data to send so-called PCNs (Product Change Notification) / PTNs (Product Termination Notice). This is done to fulfil a contractual obligation pursuant to Article 6 (1) lit. b) GDPR or to safeguard our common interests pursuant to Article 6 (1) lit. f) GDPR. The legitimate interest lies in the interests of respecting contractual duties of data protection as well as ensuring your early involvement so as to create reliability in planning.

If necessary, we process your data beyond the purposes of the contract to protect legitimate interests as pursuant to Article 6 (1) lit. f) GDPR, to develop and improve

our offers and manage business activities. Furthermore, there is a legitimate interest in maintaining risk management within the Group. Within the context of the legitimate interest in accordance with Article 6 (1) lit. f) GDPR, we also use your data to inform you about similar deals and products.

4. Recipients

Würth Elektronik Stelvio Kontek S.p.A. enlists specialised technical service providers within the scope of the technical processing of your personal data for order processing. These service providers are carefully selected and legally and contractually required to ensure a high level of data protection. The order processing is conducted in accordance with Article 28 GDPR.

We contract a shipping company to complete your order. These companies are legally required, as are we, to ensure and observe a high level of data protection. We only share your personal data with third parties for other purposes than those mentioned here insofar as we are legally obligated to do so in the form of an overriding legal provision (e.g., in the event of an audit).

5. Data security

The personal data collected and stored by us will be handled confidentially and protected by appropriate technical and organizational measures against loss and modification as well as unauthorised access by third parties.

6. Duration of storage

We store your personal data for as long as is necessary to fulfil our contractual obligations and to achieve the contractual purpose. In addition, retention obligations and periods as stipulated by law or authorities are also in effect. Once these retention obligations and periods expire, it is standard procedure to delete your data. If any data are not subject to the aforementioned obligation, they are deleted as soon as their storage is no longer required for the intended purpose. It should be noted that the business relationship may evolve into a continuing obligation, which can last several years.

Even after attaining the contractual or legal obligation, a retention obligation may remain in effect as follows:

- Commercial and tax retention periods. The prescribed time limits for retention and/or documentation are up to 10 years after termination of the business relationship or completion of an individual order.

7. Your rights

If all legal requirements have been fulfilled, you have the right to request from us access to your personal data or the data processing (Article 15 GDPR) and the rectification, erasure and restriction of your personal data or data processing (Articles 16 to 18 GDPR) as well as the transfer of your personal data (Article 20 GDPR).

In addition, if all legal requirements have been fulfilled you have a right to object to the processing of your data as pursuant to Article 21 GDPR, which is based on a "legitimate interest" pursued by the controller in accordance with Article 6 (1) lit. f) GDPR. If you wish to exercise these rights or if you want to revoke your consent to the processing of personal data, in full or in part, with effect for the future, please send an email to:

- protezione-dei-dati@stelvio-kontek.com
- or send a letter to the address listed in Item 1.

Furthermore, according to Article 77 (1) GDPR you also have the right to lodge a complaint with a supervisory authority, in particular in the Member State where you reside or work or where the alleged violation takes place if you believe that the processing of your personal data is in violation of GDPR.

Supplementary data protection notices, in particular on your rights to access, rectification, erasure, restriction of processing, data portability, opposition and to lodge a complaint, see our data protection notice at:

<http://www.we-online.com/privacy> and
<http://www.we-online.com/privacy/businesscontact>