



**STAR Micronics GmbH**  
Robert-Grob-Str. 1, D-75305 Neuenbürg

☎ +49 (7082) 7920-0

☎ +49 (7082) 7920-20

✉ info@starmicronics.de

🌐 www.starmicronics.de

STAR Micronics GmbH Robert-Grob-Str. 1 75305 Neuenbürg

## **Information sheet for customers and interested parties in relation to data processing acc. to articles 13 and 14 of the General Data Protection Regulations of the European Union**

### **1. Name and contact data of the data controller, data protection officer**

This information sheet is valid for the data processing carried out by us according to article 4 item 7 of the General Data Protection Regulations of the European Union (hereinafter referred to as GDPR) for the processing of personal data in the course of establishing and/or implementation of contractual relationships with our customers. Our contact information is:

STAR Micronics GmbH  
Robert-Grob-Strasse 1  
75305 Neuenbuerg  
Germany

Managing Director: Michael Seibold

Email: [info@starmicronics.de](mailto:info@starmicronics.de)

Phone: +49 7082 79200

Fax: +49 7082 792020

The data protection officer of the STAR Micronics GmbH according to article 37 of the GDPR, § 38 German Federal Data Protection Act (hereinafter referred to as FDPA) is:

Sven Seeger  
c/o STAR Micronics GmbH  
Robert-Grob-Strasse 1  
75305 Neuenbuerg  
Germany  
Email: [datenschutz@starmicronics.de](mailto:datenschutz@starmicronics.de)  
Phone: +49 7082 79200  
Fax: +49 7082 792020

### **2. Processing of personal data, type and purpose of the processing, legal basis for the processing, deletion deadlines**

In order to establish and/or implement a contractual relationship we collect the required personal data from the respective contact persons of our customers.

In particular, this includes the following data categories:

- greeting, title, first name, surname
- email address
- postal address
- telephone numbers (fixed line and/or mobile),
- possibly further contact data (e.g. messenger identification codes, or similar)
- information required to establish and /or implement the contractual relationship, e.g. product and/or service-related enquiries or statements of our customers, enquiries regarding the warranty and other service enquiries.

The collection of the above-mentioned data is made:

- to be able to identify the contact persons of our customers;
- to be able to communicate with the contact persons of the customer;
- to establish and/or implement a contractual relationship with our customers;
- to be able to write invoices;
- to implement rights and obligations which are created or exist between us and our customers;
- to fulfill our statutory obligations and in particular obligations in relation to commercial law, tax law and data protection law;
- to meet company reporting obligations with regard to our parent company, STAR Micronics Co., Ltd., Japan.

As far as the processing of the named data is made in order to establish and/or implement a contractual relationship, the legal basis for the processing is article 6, par. 1, sent. 1, letter b) of the GDPR. As far as the processing of the named data is made in order to meet legal obligations, the legal basis for the processing is article 6, par. 1, sent. 1, letter c) of the GDPR. As far as the processing of the named data is made in order to meet company reporting obligations with regard to our parent company, STAR Micronics Co., Ltd., Japan, the legal basis for the processing is either article 6, par. 1, sent 1, letter b) of the GDPR, article 6, par. 1, sentence 1, letter c) of the GDPR or article 6, par. 1, sent. 1, letter f) of the GDPR, whereby in the last case our legitimate concern is the fulfillment of duties under corporate law with regard to our parent company.

The personal data collected by us in order to establish and /or implement a contractual relationship are stored/saved by us until the following deadlines expire and then they are deleted:

- limitation period for all potential claims which the parties can or may have from the respective contractual relationship in accordance with §§ 194 ff. of the German Civil Code (BGB).
- as far as we provide support for the respective machine model, in compliance with the legal requirements, e.g. the sale of a new machine or delivery of replacement parts, and, in the interest of the customer, we should offer to deploy a technician.
- as far as we are obliged by law to retain the personal data for a longer period, e.g. according to the regulations of the German Commercial Code or the German Tax Code, the deletion is only carried out after the compulsory retention period has expired.

### **3. Recipients of personal data**

The following persons can receive personal data from the contact persons of our customers as far as is required and permissible by law:

- departments in our company as far as they require the personal data to meet our pre-contractual, contractual or statutory obligations,
- persons used by us to process the data according to article 4, no. 8 GDPR and article 28 GDPR,
- other service providers who we use to meet our pre-contractual, contractual or statutory obligations, e.g. suppliers of IT services, printing services, telecommunications, debt collection companies, consulting, legal consulting, tax consulting, audit services or other consulting services,
- public authorities and institutions (e.g. financial authorities, public prosecutor's office, police, supervisory bodies), respectively when we are bound by a statutory obligation or obligation to a local authority,
- companies which we transfer personal data to within the scope of contractual relationships or legal obligations (e.g. banks, credit agencies, sup-suppliers, shareholders).

Notwithstanding the above, we will only transfer personal data onto persons outside of our company when we are legally obliged or authorized to do so or we are authorized or obliged to provide information to the recipient.

#### **4. Transfer of data to non-EU countries or countries outside of the European Economic Area (EEA)**

A transfer of data to third countries (those are countries outside of the European Union and also outside of the EEA) only takes place as far as this is legally permissible or is prescribed by law.

At the present time within the scope of our company reporting obligations with regard to our parent company, STAR Micronics Co., Ltd., Japan we transfer data in the categories listed under item 2 above to STAR Micronics Co., Ltd. This transfer is made according to article 46, par. 5 GDPR on the basis of the *"standard contractual clauses for the transfer of personal data to data processors established in third countries in accordance with Directive 95/46/EC of the European parliament and commission."* And also on the basis of the *„standard contractual clauses for the transfer of personal data to non-EU countries according to the directive 95/46/EC“*, which have been concluded between us and STAR Micronics Co., Ltd.. These standard contractual clauses can be called up by the following link: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en).

#### **5. Obligation to make personal data available**

In the course of establishing and/or implementing a contractual relationship customers are only required to make the respective personal data available which is necessary to establish and/or implement the contractual relationship or where we are required by law to collect the data.

As far as we ask you for additional information, you will be separately instructed that provision of the information is made on a voluntary basis.

Without this data it is not possible for us to implement the contractual relationship. As far as this data from our customers is not made available, under some circumstances it may not be possible for us to enter into the respective contractual relationship or we are forced to end the contractual relationship.

## 6. To what extent is there an automated decision-making in individual cases (including profiling)?

In our company we do not use a fully-automated decision-making process according to article 22 GDPR. Should we introduce the use of this procedure in individual cases, we will inform you about this separately as far as this is required by law.

## 7. The rights of the data subject

Each data subject affected by the data processing described in this information sheet has the following rights with respect to us and the respective personal data:

- the right in accordance with article 15 GDPR and § 34 FDPA to **information** on the personal data of the data subject which is processed by us;
- the right in accordance with article 16 GDPR to **correction** of incorrect or completion of personal data of the data subject which is stored by us;
- the right in accordance with article 17 GDPR and § 35 FDPA to **deletion** of personal data of the data subject stored by us as far as the processing of this data is required by us to exercise the right of free expression and information, to meet a legal obligation, due to reasons in the public interest or for the assertion, exercise or defence of legal claims;
- the right in accordance with article 18 GDPR und § 35 FDPA to the **restriction of the processing** of personal data of the data subject as far as the correctness of the data is contested by the data subject, the processing is against the law, the data subject does not permit the deletion and we no longer need the data, but the data subject, however, requires the data for the assertion, exercise or defence of legal claims or in accordance with the article 21 GDPR has filed an appeal against the processing;

- **as far as we process the personal data of the data subject on the basis of a legitimate interest in accordance with article 6, par. 1 sent. 1, letter f) GDPR, the data subject has the right in accordance with 21 GDPR, to object to the processing of the personal data, when there are grounds which are due to the special situation of the data subject, or when the objection is against direct advertising;**

- the right in accordance with article 20 GDPR to **data portability**, i.e. the right for the data subject to receive personal data which the data subject made available to us, in a structured, common and machine-readable format or demand the transfer to a second responsible person;
- the right in accordance with article 7, par. 3, GDPR, to **withdraw the consent** the data subject has given us for the processing of the personal data **at any time**; whereby the consequence of such a withdrawal of consent that in future we may not be allowed to carry out the processing upon which the consent of the data subject was based; and the legality of the processing carried out until the withdrawal of consent remains unaffected;
- the right in accordance with article 77 GDPR, **to make a complaint to a supervisory authority**. For this purpose the data subject can usually make contact with the local supervisory authority in the area where the data subject resides or workplace or headquarters of our company.

## **8. Status and updating of this data privacy statement**

This data privacy statement is dated February 21, 2019. We reserve the right in due course to update the data privacy statement in order to improve the data protection and/or to make adjustments to changed administrative practice or a legal ruling.

Status: March 2019