

Data protection information from the Eschenbach Optik GmbH**Information for clients, business partners and prospective clients
concerning the collection of personal data pursuant to Art. 13 and 14
of the General Data Protection Regulation (GDPR)**

Dear clients, business partners and prospective clients,

As the controller, we hereby inform you as a client, business partner or prospective client that we,

**Eschenbach Optik GmbH
Fürther Straße 252
90429 Nürnberg
Germany**

will process your personal data (hereafter referred to as "data") in accordance with the EU General Data Protection Regulation (GDPR) and the new version of the German Federal Data Protection Act [Bundesdatenschutzgesetz, BDSG n. F.]. You or your employees are data subjects in the sense of Art. 4 Number 1 of the General Data Protection Regulation.

1. At the time of the data collection, under **Art. 13(1)** and **Art. 14(1)** of the General Data Protection Regulation, the controller must inform the data subject about the following if the data subject does not already possess this information:

a) Contact details of the controller

Phone: +49 911 3600-0
E-Mail: mail@eschenbach-optik.com

b) Contact details of our external data protection officer and our internal data protection team

E-Mail: datenschutz@eschenbach-optik.com

c) Data processing purpose and legal basis

Data is processed (in particular, collected, used, stored and transmitted) for the purposes of fulfilling a contract (contract performance, payment processing, customer and invoice management, reporting, for carrying out contractually required repair work for private end customers), for the purposes of carrying out pre-contractual work (which, in particular, is carried out at the request of the data subject, i.e. quotes), for the purposes of fulfilling a legal obligation (e.g. to fulfil a legal warranty obligation) or for the purpose of protecting a legitimate interest (acquisition) and for the purpose of conducting, recording and post-processing meetings using online tools (this includes telephone conferences, online meetings, video conferences, webcasts, broadcasts, etc.).

Furthermore, we compare your personal data required for this with the embargo and anti-terror lists in order to comply with the sanction lists whose aim is to prevent, combat and investigate the financing of terrorism and criminal offenses that endanger property. In particular due to the regulations in the European anti-terrorism regulations 2580/2001 and 881/2002, we have to compare your personal data required for this with the so-called "EU terror list" in order to ensure that no funds or other economic resources are made available for terrorist purposes. In addition, the Customs Code Implementation Ordinance ("Zollkodex-Durchführungsverordnung", ZK-DVO) requires security reviews and regular background reviews in order to obtain the "Authorized Economic Operator - AEO" status and to receive customs benefits. The Customs also require a confirmation of the terrorist lists comparison as part of the security checks.

The legal basis for the processing of the client, business partner or prospective client data is especially Art. 6(1) Letter b of the General Data Protection Regulation (data processing for the performance of a contract), Art. 6(1) Letter f of the

General Data Protection Regulation (data processing for the purposes of legitimate interests), Art. 6(1) Letter c of the General Data Protection Regulation (compliance with a legal obligation).

Another legal basis may be the consent of the client, business partner or of the prospective client in the sense of Art. 6(1) Letter a of the General Data Protection Regulation.

d) Legitimate interests of the controller or of a third party

If processing is performed on the basis of Art. 6(1) Letter f of the General Data Protection Regulation for the purposes of the legitimate interests pursued by the controller or by a third party, the client, business partner or prospective client must be informed about this. Legitimate interests may include legal, economic or intellectual interests whose legitimation must be determined by a weighing of the interests of the client, business partner and prospective client in each case.

In this case, processing may also be performed on the basis of economic interests that consist of establishing or maintaining a business relationship.

e) Recipients or categories of recipients

Under Art. 4 Number 9 of the General Data Protection Regulation, recipients of your data may include natural or legal persons, public officials or institutions.

Your data may be transferred to our competent internal offices or to other branches of our company.

In addition, your data may be transferred to external services providers (e.g. repair service provider, IT service providers, like provider of cookie banner solutions, licensors, consulting, disposal and data destruction or accounting service providers, agencies and printing companies). The service providers commissioned by us (commissioned processors) were carefully selected and reviewed by us. In addition, we conclude processing agreements with every commissioned processor in accordance with Art. 28 of the General Data Protection Regulation. In the context of financing transactions or factoring, contract master data of partner companies and customers can be transmitted to banking institutions in order to fulfill the contract.

In order to conduct meetings using online tools, personal data processed in connection with participation may be passed on. In principle, this data will not be passed on to third parties unless it is specifically intended to be passed on. Please note that the contents of telephone conferences and meetings using online tools, as in personal meetings, are often used to communicate information with customers, interested parties or third parties and are therefore intended to be passed on. Furthermore, the provider of the communications platform that is used, as well as any sub-contractors, will inevitably gain knowledge of the data where this is necessary or intended within the context of our order processing contract with the provider of the communications platform or any contractual relationships with sub-contractors.

As part of the embargo and anti-terror list comparison, the personal data required for this is passed on to the software service providers who enable us to digitally carry out the embargo and anti-terror list comparison (AEB, ATLAS). As far as it is legally required and it cannot be ruled out that the respective service provider takes note of the data, a data processing agreement according to Article 28 GDPR was concluded. As far as this is necessary to prove the terrorist list comparison, the necessary information for the embargo and anti-terror list comparison that has been carried out is forwarded to the responsible customs authority.

f) Data transmissions to third countries or international organizations

Your data will be processed exclusively within the EU and saved on secured servers in Germany under adherence to the General Data Protection Regulation.

If, during processing, your data is transmitted to countries outside of the EU or the EEA or to service providers in countries outside of the EU or the EEA (so-called third countries), we will check whether an adequacy decision by the European Commission exists or will conclude data protection agreements accordingly, especially on commissioned processing and EU standards.

g) Categories of personal data

For the cooperation, we will process the following data:

- Identification data (e.g. name, first name)
- Contact data (e.g. address, (private) telephone numbers and email address)
- Payment/financial information (e.g. account information, tax information)
- Information on your use of our systems, devices and our property (e.g. the ID of your computer and/or mobile phone or other device, mobile and landline telephone numbers, user IDs, IP addresses, log files)
- Customer number and contract master data
- Other data disclosed voluntarily
- During repair work for private end customers: details about private end customers, such as first name, last name, delivery address, customer number, repair order, customer's concerns, services according to the repair order (quote, costs), invoices for the repair work, data required to track payments, reminders and to enter repair orders in the accounts
- In the context of telephone conferences, details of incoming and outgoing telephone numbers, country name, start and end time. Where appropriate, connection data, such as the device's IP address, may be saved
- In the context of meetings using online tools, details about the user (last name, first name, pseudonym, optionally telephone number, email address, password, optionally profile picture, optionally department), meeting data (subject, optionally description, participants' IP addresses, device/hardware information), optionally recordings (MP4 file of all video, audio and presentation recordings, M4A file of all audio recordings, text file of the online chat) as well as text, audio and video files (when using chat, question or survey functions). This means that text entries you make will be processed so that they can be displayed and, possibly, logged in online meetings, video conferences and webinars. To enable the display of video and the reproduction of audio, the data from your device's microphone and webcam, if you have one, will be processed accordingly for the duration of the meeting. You can switch off the camera or mute the microphone yourself at any time
- Data in the context of the embargo and anti-terror list comparison: identification data such as name, date of birth, possibly place of birth and contact data such as address.

2. Furthermore, at the time of data collection, the controller must inform the data subject about the following under Art. 13(2) and Art. 14(2) of the General Data Protection Regulation unless the data subject already possess this information:

a) Sources of personal data

Usually, your data will have been provided to us by you voluntarily. In such cases, it is important for this data to be accurate and for you to assist us in keeping this data up to date.

Other sources include especially:

- Business partners/suppliers
- Marketing measures (e.g. advertising)
- Certain publicly accessible information from public sources (including from the Internet)

b) Storage duration

We will only save your data until the pre-contractual or contractual purpose is fulfilled and no other legal storage obligations apply (e.g. commercial law or tax law storage requirements).

If you granted your consent, we will save your data until you withdraw your consent if there is no other legal basis for the processing of your data.

Furthermore, your data will only be stored if it is required to assert/exercise rights or defend against legal claims. To prove that repair work for private end customers has been carried out correctly, it is necessary, for example, for personal data to be stored in our IT systems until the end of the limitation period for damage claims (including after the end of the warranty period).

When using communications platforms to conduct meetings using online tools, reports about online meetings (meeting meta data, data on telephone dial-up, questions and answers in webinars, survey functions in webinars) will be saved -

where you are registered as a user. With respect to the storage period, we refer to the data protection regulations of the provider of the communications platform.

c) Your data subject rights

Under Art. 15 of the General Data Protection Regulation, you may obtain information about the data we process concerning you at any time. You may especially obtain information about the purposes of the processing, the categories of processed data, the categories of possible recipients and the scheduled storage duration.

In addition, under Art. 16 of the General Data Protection Regulation, you may obtain rectification of any inaccurate data.

Additionally, under Art. 17 of the General Data Protection Regulation, you may obtain the erasure of data concerning you if its storage is no longer required, you withdraw your consent to the data processing and if there is no other legal basis for the processing, you object to the processing and there are no overriding reasons for further processing your data, your data is processed unlawfully or in case of a legal erasure obligation under EU or national law.

Furthermore, under Art. 18 of the General Data Protection Regulation, you have a right to restricted processing if you contest the accuracy of the data concerning you for a duration that allows the controller to review the accuracy, if the processing is unlawful, but you reject the erasure of the data, the purpose for the processing no longer applies, but the data is still needed for the exercise of legal claims or if you object in accordance with Art. 21 of the General Data Protection Regulation and whether the legitimate reasons of the controller override your interests has not yet been determined.

Furthermore, under Art. 20 of the General Data Protection Regulation, you have the right to receive the data concerning you in a commonly-used, structured and machine-readable format (data portability). In addition, under certain conditions, you may have your data transmitted directly by a controller if technically feasible.

You have the right to object to the use of your data for the above-stated purposes at any time (Art. 21 of the General Data Protection Regulation).

If you consent to our processing of your data, you may withdraw this consent at any time for the future.

If you would like to withdraw your consent or exercise the above-stated data subject rights, please write us at **Eschenbach Optik GmbH, Fürther Straße 252, 90429 Nürnberg, Germany** or send us an email at **datenschutz@eschenbach-optik.com**.

d) Right to lodge a complaint to a supervisory authority

You may lodge a complaint to a data protection supervisory authority at any time (Art. 77 of the General Data Protection Regulation).

A list of supervisory authorities in Germany (for the non-public sector) and their addresses can be found at: https://www.bfdi.bund.de/DE/Infothek/Anschriften_Links/anschriften_links-node.html (in German)

e) Providing data

If the providing of data is legally or contractually required or necessary for contract conclusion, the client, business partner or prospective client must be informed about this.

Data (e.g. one's name, address or email address) is especially required for the establishment of contractual relationships. Invoicing and payment processing require additional data (e.g. the invoice recipient, account data and invoice address). We transmit your personal data insofar as we are legally or contractually obliged to do so.

Due to license agreements with third parties, we may transmit data from the optician business, in particular the customer number, address data, article number, article description, discounts and complaints to the license partner for the purpose of selective customer analysis based on our contractual obligations from the license agreements.

If you do not provide your data to us, we will be unable to establish or maintain a business relationship with you and cannot ensure the orderly fulfillment of contractual or legal obligations.

f) Automated decision-making, including profiling

No automated decision-making, including profiling, is performed (Art. 22 of the General Data Protection Regulation).

3. Information concerning intended changes to data processing purposes

We will only process your data for the above-stated purposes.

Should the purposes for data processing change, we will inform you about the new purpose in time before any further processing.

Sincerely,

ESCHENBACH OPTIK GMBH

- Management -

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