

1. Privacy Policy

Thank you very much for your interest in our company. Data protection is a top priority for the employees and management of Dr. Tillwich GmbH Werner Stehr. Use of the internet pages of Dr. Tillwich GmbH Werner Stehr is generally possible without providing any personal data. However, if a data subject wishes to make use of special services of our company via our website, it may be necessary to process their personal data. If the processing of personal data is necessary and there is no legal basis for such processing, we will normally request the consent of the data subject.

The processing of personal data, such as the name, address, e-mail address or telephone number of a data subject, is always carried out in accordance with the General Data Protection Regulation and in accordance with the country-specific data protection regulations applicable to Dr. Tillwich GmbH Werner Stehr. By publishing this Privacy Policy, our company aims to inform the public about the type, scope and purpose of the personal data collected, used and processed by us. Furthermore, this Privacy Policy informs data subjects of their rights.

As the data controller, Dr. Tillwich GmbH Werner Stehr has implemented numerous technical and organisational measures to ensure the most complete protection of the personal data processed through this website. Nevertheless, Internet-based data transmissions may in principle have security gaps, so that absolute protection cannot be guaranteed. For this reason, every data subject is free to transmit personal data to us by alternative means, such as by telephone.

2. Definitions

The Privacy Policy of Dr. Tillwich GmbH Werner Stehr is based on the terms used by the European legislator for the adoption of the General Data Protection Regulation (GDPR). Our Privacy Policy should be easy to read and understand both for the public as well as for our customers and business partners. To ensure this, we would like to first explain some of the terms used.

We use the following terms in this Privacy Policy:

2.1 Personal data

Personal data means any information relating to an identified or identifiable natural person (referred to in the following as "data subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

2.2 Data subject

A data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

2.3 Processing

Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

2.4 Restriction of processing

Restriction of processing is the marking of stored personal data with the aim of limiting its processing in the future.

2.5 Profiling

Profiling refers to any form of automated processing of personal data consisting of the use of this personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

2.6 Pseudonymisation

Pseudonymisation is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is stored separately and is subject to technical and organisational measures to ensure that the personal data is not attributed to an identified or identifiable natural person.

2.7 Controller or controller responsible for processing

A controller or controller responsible for processing is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. Where the purposes and means of such processing are determined by Union or member state law, the controller or the specific criteria for their nomination may be provided for by Union or member state law.

2.8 Processor

A processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

2.9 Recipient

A recipient is a natural or legal person, public authority, agency or another body, to which the personal data is disclosed, irrespective of whether it is a third party or not. However, public authorities which may receive personal data within the scope of a particular inquiry in accordance with Union or member state law shall not be regarded as recipients.

2.10 Third party

A third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor or persons who are authorised to process personal data under the direct authority of the controller or processor.

2.11 Consent

Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

3. Name and address of the controller

The controller for the purposes of the General Data Protection Regulation (GDPR), of other data protection laws applicable in member states of the European Union and of other provisions related to data protection is:

Dr. Tillwich GmbH Werner Stehr
Murber Steige 26
72160 Horb- Ahldorf
Germany
Tel.: +49 7451 5386 0
E-mail: datenschutz@tillwich-stehr.com
Website: www.tillwich-stehr.com

3.1. Name and address of the Data Protection Officer

The Data Protection Officer of the controller is:

Matthias Herrlinger
connexo GmbH
Jägerstraße 4F
71296 Heimsheim
Germany
Tel.: +49 7033 46938 70
E-mail: dsb@dsbbw.de
Website: www.dsbbw.de

Any data subject may, at any time, contact our Data Protection Officer directly with any questions and suggestions concerning data protection.

4. Cookies

The internet pages of Dr. Tillwich GmbH Werner Stehr use cookies. Cookies are text files that are stored on a computer system via an internet browser.

Many internet sites and servers use cookies. Many cookies contain a so-called cookie ID. A cookie ID is a unique identifier of the cookie. It consists of a character string through which internet pages and servers can be assigned to the specific internet browser in which the cookie was stored. This allows visited internet sites and servers to differentiate the individual browser of the data subject from other internet browsers that contain other cookies. A specific internet browser can be recognised and identified using the unique cookie ID. Through the use of cookies, Dr. Tillwich GmbH Werner Stehr can provide the users of this website with more user-friendly services that would not be possible without setting cookies.

The information and material on our website can be optimised for the benefit of the user by means of a cookie. Cookies allow us, as previously mentioned, to recognise users of our website when they return. The purpose of this recognition is to make it easier for users to utilise our website. For example, the user of a website that utilises cookies does not have to enter access data each time they visit the website, because this task is performed by the website and the cookie stored on the user's computer system. Another example is a shopping cart cookie in an online shop. The online store remembers via a cookie the item that a customer has placed in the virtual shopping cart.

The data subject may at any time prevent our website from setting cookies by defining a corresponding setting on the internet browser, and may thus permanently deny the setting of cookies. Furthermore, previously set cookies may be deleted at any time by an internet browser or other software programs. This is possible in all standard internet browsers. If the data subject deactivates the setting of cookies in the internet browser, not all functions of our website may be entirely usable.

5. Collection of general data and information

The website of Dr. Tillwich GmbH Werner Stehr collects a series of general data and information when a data subject or automated system accesses the website. This general data and information is stored in the server log files. The following data may be collected: (1) the browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (referrer), (4) the sub-websites, (5) the date and time of access to the website, (6) an internet protocol address (IP address), (7) the internet service provider of the accessing system, and (8) any other similar data and information that may be used in the event of attacks on our information technology systems.

When using this general data and information, Dr. Tillwich GmbH Werner Stehr does not allow identification of the data subject. Rather, this information is needed to (1) deliver the content of our website correctly, (2) optimise the content and publishing of our website, (3) ensure the long-term viability of our information technology systems and website technology, and (4) provide law enforcement authorities with the information necessary for criminal prosecution in event of a cyber attack. Dr. Tillwich GmbH Werner Stehr therefore analyses anonymously collected data and information statistically, but also with the aim of increasing the data protection and data security of our enterprise, and to ensure an optimal level of protection for the personal data we process. The anonymous data in the server log files is stored separately from all personal data provided by a data subject.

6. Contact via the website

The Dr. Tillwich GmbH Werner Stehr website contains details that enable rapid electronic contact with our enterprise as well as direct communication with us; this also includes a general address (e-mail address). If a data subject contacts the controller by e-mail or via a contact form, the personal data transmitted by the data subject is automatically stored. Such personal data transmitted on a voluntary basis by a data subject to the data controller is stored for the purpose of processing or contacting the data subject. There is no transfer of this personal data to third parties.

7. Routine erasure and blocking of personal data

The data controller will process and store the personal data of the data subject only for the period necessary to achieve the purpose of storage, or as far as this is granted by the European legislator or other legislators in laws or regulations to which the controller is subject.

If the storage purpose is not applicable, or if a storage period prescribed by the European legislator or another competent legislator expires, the personal data is routinely blocked or erased in accordance with legal requirements.

Restriction of processing is the marking of stored personal data with the aim of limiting its processing in the future.

8. Rights of the data subject

8.1 Right of confirmation

Each data subject shall have the right granted by the European legislator to obtain from the controller the confirmation as to whether or not personal data concerning them is being processed. If a data subject wishes to avail him/herself of this right of confirmation, he or she may, at any time, contact an employee of the controller.

8.2 Right of access

Each data subject shall at all times have the right granted by the European legislator to obtain free of charge from the controller information about his or her stored personal data and a copy of this information. Furthermore, the European directives and regulations grant the data subject access to the following information:

- the purposes of the processing
- the categories of personal data to be processed
- the recipients or categories of recipients to whom the personal data has been or will be disclosed, in particular, recipients in third countries or international organisations
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period
- the existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing
- the existence of the right to lodge a complaint with a supervisory authority
- where the personal data is not collected from the data subject, any available information as to its source
- the existence of automated decision-making, including profiling, referred to in Article 22 (1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject

Furthermore, the data subject shall have a right to obtain information as to whether personal data is transferred to a third country or to an international organisation. Where this is the case, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer.

If a data subject wishes to avail him/herself of this right of access, he or she may, at any time, contact an employee of the controller.

8.3 Right of rectification

Each data subject shall have the right granted by the European legislator to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall also have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

If a data subject wishes to avail him/herself of this right of rectification, he or she may, at any time, contact an employee of the controller.

8.4 Right to erasure (right to be forgotten)

Each data subject shall have the right granted by the European legislator to obtain from the controller the erasure of personal data concerning him or her without undue delay where one of the following grounds applies and as long as the processing is not necessary:

- The personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed.
- The data subject withdraws the consent on which the processing is based according to point (a) of Article 6 (1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing.
- The data subject objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR.
- The personal data has been unlawfully processed.
- The personal data must be erased in order to comply with a legal obligation in Union or member state law to which the controller is subject.
- The personal data has been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

If one of the aforementioned reasons applies, and a data subject wishes to request the erasure of personal data stored by Dr. Tillwich GmbH Werner Stehr, he or she may, at any time, contact an employee of the controller. The employee of Dr. Tillwich GmbH Werner Stehr shall ensure that the erasure request is complied with without delay.

Where Dr. Tillwich GmbH Werner Stehr has made personal data public and our company as controller is obliged pursuant to Article 17(1) of the GDPR to erase the personal data, Dr. Tillwich GmbH Werner Stehr, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform other controllers processing the disclosed personal data that the data subject has requested erasure by such controllers of any links to, or copies or replications of, this personal data, provided that the processing is not required. An employee of Dr. Tillwich GmbH Werner Stehr will arrange the necessary measures in individual cases.

8.5 Right of restriction of processing

Each data subject shall have the right granted by the European legislator to obtain from the controller restriction of processing where one of the following applies:

- The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data.
- The processing is unlawful and the data subject opposes the erasure of the personal data and requests instead the restriction of its use instead.
- The controller no longer needs the personal data for the purposes of the processing, but it is required by the data subject for the establishment, exercise or defence of legal claims.
- The data subject has objected to processing pursuant to Article 21(1) of the GDPR pending the verification of whether the legitimate grounds of the controller override those of the data subject.

If one of the aforementioned conditions is met, and a data subject wishes to request the restriction of the processing of personal data stored by Dr. Tillwich GmbH Werner Stehr, he or she may at any time contact any employee of the controller. The employee of Dr. Tillwich GmbH Werner Stehr will arrange the restriction of the processing.

8.6 Right to data portability

Each data subject shall have the right granted by the European legislator to receive the personal data concerning him or her, which was provided to a controller, in a

structured, commonly used and machine-readable format. He or she shall also have the right to transmit this data to another controller without hindrance from the controller to which the personal data was provided, as long as the processing is based on consent pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. Furthermore, in exercising his or her right to data portability pursuant to Article 20(1) of the GDPR, the data subject shall have the right to have personal data transmitted directly from one controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others.

In order to assert the right to data portability, the data subject may at any time contact an employee of Dr. Tillwich GmbH Werner Stehr.

8.7 Right to object

Each data subject shall have the right granted by the European legislator to object at any time, on grounds relating to his or her particular situation, to the processing of personal data concerning him or her, which is based on point (e) or (f) of Article 6(1) of the GDPR. This also applies to profiling based on these provisions.

Dr. Tillwich GmbH Werner Stehr shall no longer process the personal data in the event of an objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.

Where Dr. Tillwich GmbH Werner Stehr processes personal data for direct marketing purposes, the data subject shall have the right to object at any time to the processing of personal data concerning him or her for the purposes of such marketing. This also applies to profiling to the extent that it is related to such direct marketing. Where the data subject objects to Dr. Tillwich GmbH Werner Stehr to the processing for direct marketing purposes, Dr. Tillwich GmbH Werner Stehr will no longer process the personal data for these purposes.

In addition, the data subject has the right, on grounds relating to his or her particular situation, to object to the processing of personal data concerning him or her by Dr. Tillwich GmbH Werner Stehr for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1) of the GDPR, unless the processing is necessary for the performance of a task carried out for reasons of public interest. In order to exercise the right to object, the data subject may contact an employee of Dr. Tillwich GmbH Werner Stehr. In addition, the data subject is free in the context of the use of information society services, and notwithstanding Directive 2002/58/EC, to use his or her right to object by automated means using technical specifications.

8.8 Automated individual decision-making, including profiling

Each data subject shall have the right granted by the European legislator not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) is not authorised by Union or member state law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or (3) is not based on the data subject's explicit consent.

If the decision (1) is necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) it is based on the data subject's explicit consent, Dr. Tillwich GmbH Werner Stehr shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller to express his or her point of view and contest the decision.

If the data subject wishes to exercise the rights concerning automated individual decision-making, he or she may, at any time, contact an employee of the controller.

8.9 Right to withdraw data protection consent

Each data subject shall have the right granted by the European legislator to withdraw his or her consent to processing of his or her personal data at any time.

If the data subject wishes to exercise the right to withdraw consent, he or she may, at any time, contact an employee of the controller.

9. Data protection for employment applications and application procedures

The data controller shall collect and process the personal data of applicants for the purpose of processing the application procedure. The processing may also be carried out electronically. This is the case, in particular, if an applicant submits corresponding application documents by email or by means of a web form on the website to the controller.

If the data controller concludes an employment contract with an applicant, the submitted data will be stored for the purpose of processing the employment relationship in compliance with legal requirements. If an employment contract with the applicant is not concluded by the controller, then the application documents will be automatically erased six months after notification of the rejection decision, provided that no other legitimate interests of the data controller conflict with such erasure. Other legitimate interests in this context include, for example, the duty to provide evidence in proceedings under the General Equal Treatment Act (Allgemeines Gleichbehandlungsgesetz - AGG).

10. Legal basis for the processing

Point a of Art. 6(1) of the GDPR serves for our company as the legal basis for processing operations for which we obtain consent for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as is the case, for example, when processing operations are necessary for the supply of goods or to provide any other service, the processing is based on point b of Article 6(1) of the GDPR. The same applies to such processing operations which are necessary for carrying out pre-contractual measures, for example in the case of inquiries concerning our products or services. Where our company is subject to a legal obligation according to which processing of personal data is required, such as for the fulfillment of tax obligations, the processing is based on point c of Art. 6(1) of the GDPR. In rare cases, the processing of personal data may be necessary to protect the vital interests of the data subject or of another natural person. This would be the case, for example, if a visitor were injured in our company and his or her name, age, health insurance data or other vital information needed to be passed on to a doctor, hospital or other third party. Then the processing would be based on point d of Art. 6(1) of the GDPR. Finally, processing operations could also be based on point f of Article 6(1) of the GDPR. This legal basis is used for processing operations which are not covered by any of the above-mentioned legal grounds, where processing is necessary to protect the legitimate interests of our company or of a third party, except where such interests are overridden by the interests, fundamental rights and basic freedoms of the data subject. Such processing operations are particularly viewed by us as permissible since they have been specifically mentioned by the European legislator, which considered that a legitimate interest could be assumed if the data subject is a client of the controller (Recital 47 Sentence 2 of the GDPR).

11. The legitimate interests pursued by the controller or by a third party

Where the processing of personal data is based on point f of Article 6(1) of the GDPR, our legitimate interest is to carry out our business in favour of the well-being of all our employees and shareholders.

12. Period for which the personal data will be stored

The criteria used to determine the period of storage of personal data is the respective statutory retention period. At the end of that period, the corresponding data is routinely deleted, as long as it is no longer necessary for the fulfillment of the contract or the initiation of a contract.

13. Provision of personal data as statutory or contractual requirement; requirement necessary to enter into a contract; obligation of the data subject to provide the personal data; possible consequences of failure to provide such data

We hereby inform you that the provision of personal data is in some cases required by law (e.g. tax regulations) or can also result from contractual provisions (e.g. information on the contractual partner). Sometimes, in order to conclude a contract, it may be necessary that the data subject provides us with personal data, which must subsequently be processed by us.

The data subject may, for example, be obliged to provide us with personal data when our company signs a contract with him or her. The non-provision of such personal data would have the consequence that the contract with the data subject could not be concluded. Before personal data is provided by the data subject, the data subject must contact one of our employees. The employee then informs the data subject whether the provision of the personal data is required by law or contract or is necessary for the conclusion of the contract, whether there is an obligation to provide the personal data and the consequences of non-provision of the personal data.

14. Existence of automated decision-making

As a responsible company, we do not use automatic decision-making or profiling. The German version of this Privacy Policy was generated by the Privacy Policy Generator of the German Association for Data Protection that was developed in cooperation with the data privacy lawyer Christian Solmecke, Cologne. The English version is a translation of the German Privacy Policy. In case of doubt, the German version shall apply.