

*Note: The German language version will take precedence over translations into other languages.

Privacy Policy and at the same time information of the data subjects in accordance with Articles 13 and 14 of the EU General Data Protection Regulation*

BellandVision GmbH (hereinafter referred to as BellandVision) is pleased that you are showing interest in our online portal and our company. Data protection and data security are near and dear to us and therefore, both have a high priority for us. We thus obligate ourselves to manage your (personally identifiable) data securely and to protect it from loss, misuse or forgery. To protect your data, we implement numerous technical and organisational standards. Nevertheless, we need to point out that regarding this issue, any time data is transmitted on the internet, it is technically impossible to provide complete protection against unauthorized access by third parties. In this policy, BellandVision wishes to inform you about the kind, amount and purpose of processing personally identifiable information that we handle, and to educate Data Subjects about the rights that they have.

A. Name and Contact Details of the Officer in Charge

BellandVision GmbH Bahnhofstr. 9 91257 Pegnitz Geschäftsführung: Diana Uschkoreit (Sprecherin) Markus Weber Telefon: +49 (0) 9241-4832-0 Telefax: +49 (0) 9241-4832-437 www.bellandvision.de	Data Protection Officer: Robert Aumiller datenschutzbeauftragter@bellandvision.de
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B. Important Terms to Understand this Policy

What is Personally Identifiable Data?

The term personally identifiable data is defined in the EU General Data Protection Regulation (hereinafter referred to as GDPR). It is information about a particular or identifiable natural person. This includes for example your real name, your postal address, your telephone number and your date of birth, but also other ID numbers, location data as well as physical, faith-related, or economic details.

Who is a Data Subject?

Data Subject refers to any given natural or identifiable person that can be determined based on the data collected and processed.

What does Data Processing mean?

The General Data Protection Regulation describes data processing as the 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 of personally identifiable data.

C. The purpose of Data Processing and Data Security

1. Preface

As part of our business activities, particularly in the distribution, purchasing and service departments, we have access to information that is governed by data protection guidelines (such the names of staff members, email addresses or other master data for communication or contractual purposes). BellandVision processes personally identifiable data, for example of customers, service providers or visitors to our website as long as this is necessary to provide our services and to enable us to make a serviceable website and its contents available. All data processing is carried out pursuant to the provisions in Art. 6 (1) of the GDPR, in particular, and based on consent given for the fulfilment of contracts and to protect legitimate interests of BellandVision. The optimisation or improvement of the user-friendliness of the services and content offered constitute “legitimate interest”, as do prevention of misuse or criminal acts, ensuring quality standards and enabling measures within the scope of audits that would affect BellandVision or that would prevent it from implementing steps for direct advertisement or other acquisition activities. In addition, another basis for data processing is the need to meet legal duties or carrying out a task that is in the interest of the public.

2. Website

You can visit our website without leaving any personal details as we do not store data in connection with this. What is collected is some more general data and information, e. g. the user agent; the internet page from which you came to our website; the date and time you accessed it as well as your IP address and similar details that help us defend ourselves against attacks on our IT systems. Such general, anonymously collected data and information is stored for up to seven days by our hosting service provider. The information is needed to display the content of our website correctly; to optimise the content of our website and our advertisement; to ensure the stable functionality of our IT systems and the technology of our internet page as well as to make any relevant information available to law enforcement agencies in case of criminal prosecution following a cyberattack. Such anonymously collected data and information is analysed statistically, on the one hand, and on the other hand, it is evaluated furthermore for the purpose of increasing data protection and data security in our company to ultimately achieve an optimised level of protection for the personally identifiable data that we process. The anonymous data of the server log files is stored separately from all other personally identifiable data entered by a Data Subject. To improve our offers, we only analyse statistical data, which does not allow us to infer anything about you. Wherever personally identifiable data (for example someone’s name, postal address or email address) is collected on our web pages, it is, wherever possible, optional or based on already existing contractual agreements. If it is necessary to process personally identifiable data and if there is no legal basis for doing so, we generally require the consent of the Data Subject.

a. Google Analytics

This website uses Google Analytics, an internet analysis service of Google Inc. (“Google”). Google Analytics uses so-called “Cookies”, that is text files that are stored on your computer and that make an analysis of how the website is used possible. The information generated by the cookies about how you use this website (including your IP address) are transferred to a Google server in the USA and stored there. Google will then use these details to analyse how you use the website, to compile reports about website activities for the website operator and to provide further services in connection with the use of our website and your use of the internet. Google might also pass this information along to third parties if this is legally required or if such third parties further process the data on behalf of Google. Google itself has stated that it will under no circumstances connect your IP address to other data from Google. We would like to point out that on this website, Google Analytics was expanded by this code: “gat._anonymizeIp();” in order to ensure that the collection of IP addresses is anonymised.

When the website is loaded for the first time, a so-called cookie banner appears, with which users of the BellandVision website must actively agree to the use of the Google cookies mentioned above (under “Statistics”). You have the option to change these settings at any time.

You can prevent the installation of cookies by adjusting the relevant settings on your browser.

However, we would like to point out that in case you do disable cookies, you might not be able to fully use our web services.

By using this website, you agree to the processing of data collected about you by Google as described above and for the above-mentioned purpose.

Furthermore, you can prevent the collection of data generated by the cookies and all data about how you use our website (incl. your IP address) for Google as well as the processing of such data by Google by downloading and installing the browser plugin available at the link below <https://tools.google.com/dlpage/gaoptout?hl=en>.

You can also prevent the collection of data by Google Analytics by clicking on the link for this purpose on our website. Thus an opt-out cookie is enabled, which will prevent the collection of your data when visiting this website in the future.

If the information technology system of the Data Subject is deleted, formatted or re-installed at a later date, the Data Subject will need to install the browser add-on again to deactivate Google Analytics once more.

For more information about the terms of use and privacy policy go to <http://www.google.com/analytics/terms/gb.html> or <https://policies.google.com/?hl=en-GB>.

b. Cookies

Our internet pages use so-called cookies in different places. For the processing of personal data by means of cookies on our website, please refer to our cookie policy: <https://www.bellandvision.de/cookie-richtlinien.htm>, which is part of this privacy policy. Cookies are small text files that are put on your computer and that are stored by your browser. They are only used and stored for as long as it is technically needed. Cookies enable us to recognise those who use our website again. They serve the purpose of making our offer more user-friendly, more effective, and safer. Of course, you can also view our website without cookies. If you do not wish for these cookies to be stored on your hard drive, you can prevent it by adjusting the relevant settings in your browser. Further instructions for how to do so can be found in the instructions of your browser. We would like to point out that in case you disable cookies, you might not be able to fully use our web services. Cookies are free from viruses and won't cause any damage to your computer.

c. YouTube

We have integrated components of YouTube into our website. YouTube is an internet video portal, which makes it possible to upload and view all kinds of video clips online for free. YouTube is operated by YouTube, LLC, 901 Cherry Ave., San Bruno, CA 94066, USA. YouTube, LLC is a subsidiary of Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA. BellandVision has activated the advanced data protection mode for users who will use those components so that YouTube cannot save any information about visitors to the BellandVision website. Details about the collection, use, and further processing of personally identifiable data through YouTube or Google in case you actively click on a video, can be found in the privacy policy published by YouTube at <https://policies.google.com/privacy?hl=en>.

When the website is loaded for the first time, a so-called cookie banner appears with which users of the BellandVision website must actively agree to the use of the above-mentioned YouTube cookies (under "Marketing"). Users who refuse this consent will not be shown the YouTube content.

3. Web Portals / Webshop / Services

In order to use certain offers or services (e. g. our customer portal or our waste disposal contractor portal) you can register on the website by entering personally identifiable data. The registration of the Data Subject, which includes the option of entering personally identifiable data, serves the

purpose of providing the Data Subject with content and services that can, due to the nature of the system, only be offered to registered users. What personally identifiable data will be transmitted can be seen in the input mask that is used at the point of registration. During registration, the date and time of the registration are also stored to prevent misuse.

In our webshop, you can easily and quickly license your packaging. This requires the collection of certain personally identifiable data that can be seen in the input mask. If you choose to pay via the online payment service PayPal (Plus), your contact details will be transmitted to PayPal S.a.r.l. & Cie S.C.A. 22-24 Boulevard Royal, L-2449 Luxembourg, based on Art. 6 (1) b) of the GDPR. The payment service provider will process inventory data, bank details as well as contractual data. Without this data, this method of payment cannot be used. Further details about how PayPal uses your information, for example about the transfer of data to credit-worthiness information bureaus etc., can be found in the privacy policy of PayPal at https://www.paypal.com/en/webapps/mpp/ua/privacy-full?locale.x=en_GB.

Occasionally, BellandVision carries out customer surveys or makes questionnaires available as a basis for consultation services. In that case, in order to carry out the survey, it may be necessary for us to ask for certain personally identifiable data, such as name, postal address or other contact information and IP addresses. For the technical implementation, BellandVision will use an external service provider, the SurveyMonkey Europe UC that will store and securely manage such data. For this purpose, cookies, device and browser details as well as log files are used to collect data, in order to make the technical implementation possible. Bellandvision also uses survey tools provided by Qualtrics LLC, 333 W. River Park Drive, Provo, UT 84604.

BellandVision offers online training courses on various topics of system participation recyclability and disposal of packaging as well as the use of relevant software tools. In this context, it is necessary to collect and process certain personally identifiable data, e.g. names, addresses, email addresses or other contact information as well as the IP address, user names or other data and chat histories required for authentication and licence use, in order to register for and perform the respective service. Registration is carried out with the help of Living Apps from LivingLogic AG, Bayreuth, and the technical implementation is carried out via Microsoft Teams. For the use of Microsoft Teams, please refer to the Microsoft terms of use and data protection: <https://privacy.microsoft.com/de-de/privacystatement>. For the purpose of information and distribution to the participants as well as for the further development and optimisation of the online trainings, the trainings will be recorded, to which reference is made separately. If training documents prepared in this way are subsequently distributed to third parties for training purposes, this will only be done in a form that excludes the identification/identifiability of individual participants.

By participating in or using our offers, you give your consent for the collection and processing of your personally identifiable data.

The personally identifiable data entered by the Data Subject shall only be used and stored internally and for our own purposes; it shall only be made available to third parties (i. e. data processing contractors such as hosting partners) if that is technically necessary for administrative purposes.

Some of those purposes may include: the implementation of a contract; information and consultation; advertisement for our company and our services.

4. Newsletter

BellandVision regularly compiles important pieces of information and makes them available in the form of a newsletter, which contains details about the implementation of legal requirements, our services and their legal and contractual basic conditions as well as current market developments and environmental goals. Anyone who is interested in our newsletter can subscribe to it on our website. For this purpose, we use an email marketing software, currently it is Brevo (formerly Newsletter2go). When you subscribe, the personally identifiable data that you see in the input mask is what is collected, in addition to your IP address and the time of registration. We send out the newsletter via email on the basis of the consent you have given pursuant to Art. 6 (1) a) of the GDPR.

If the registration was done via the above-mentioned provider of email marketing software, personally identifiable data is collected and stored directly by them. Beyond that, no data is passed on to third parties. We would like to point out that you can, at any time, object to receiving this information in the future, for example by replying to such a newsletter or by simply clicking on the unsubscribe link in any such email campaign.

5. Using our Contact Form

Any personally identifiable data that you make available when you contact us will be used to answer your query or contact request as well as for related technical administrative purposes. If your query should lead to concluding a contract at a later date, your data will be stored for as long as it's necessary to processes pre-contractual steps or to fulfil the contract. There is no data transfer to third parties. You have the right to withdraw your consent, which you gave by submitting the form, at any time in the future. In that case, your personally identifiable data will be deleted immediately.

6. Data Protection for Applications and during the Application Process

Data concerned: Application details.

Purpose of processing: Carrying out the application procedure.

Categories of recipients: Public bodies in case of overriding legal provisions.

External service providers or other contractors, e.g. for data processing and hosting.

Other external bodies insofar as the data subject has given consent or a transfer is permissible for overriding interests, including customers and interested parties in the context of order acquisition.

Third-country transfers: In the context of the execution of the contract, order processors outside the European Union may also be used, including email providers.

Duration of data storage: Application data is usually deleted within four months after notification of the decision, unless consent has been given for longer data storage in the context of inclusion in the applicant pool.

7. Processing of customer data/prospect data/supplier data.

Such personal data that you have provided to us for the purpose of contract performance will be used for contract performance (e.g. inquiries, offers, orders, sales and invoicing, quality assurance). Any further data will only be processed on the basis of your express consent.

Data will not be disclosed to third parties or otherwise disseminated unless this is necessary for the performance of our contract (Art. 6 (1) b) of the GDPR), the disclosure is permissible due to relevant overriding legal provisions (Art. 6 (1) c) of the GDPR), in particular in the context of official or judicial proceedings concerning quantity reports pursuant to § 20 (1) VerpackG or the determination of market share pursuant to § 26 (1) sentence 2 numbers 14, 15 and 16 VerpackG. You have given your consent to the disclosure (Art. 6 (1) a) of the GDPR) or a transfer is permissible due to overriding interests.

BellandVision is also authorized to outsource the processing of your personal data in whole or in part to external service providers or other contractors who act as data processors for BellandVision in accordance with Art. 4 No. 8 of the GDPR within the framework of data protection law. External service providers support us, among other things, in data processing, technical operation and hosting as well as support of the website, the creation of web services, data management, provision and performance of services, marketing, communication and website analytics. BellandVision remains responsible for the protection of your data and ensures this through strict contractual regulations, technical and organizational measures and supplementary controls.

Your personal data will only be stored as long as it is necessary to achieve the purposes for which the data was collected or - if there are legal retention periods beyond this (e.g. in the German Commercial Code and the German Fiscal Code) - for the duration of the legally prescribed retention period. Your personal data will then be deleted immediately.

8. Processing of employee data

Within the scope of the employment relationship, BellandVision collects and processes personal data of its employees for the purpose of executing the contract. This data is used in particular for identification as an employee, for the proper execution of the employment relationship and its documentation, for the performance of correspondence with employees or institutions, for the preparation of payroll accounting as well as social security and tax law notifications and for all other processes in connection with the employment relationship.

The legal basis for the processing of personal data is primarily the fulfillment of the employee contract according to Art. 6 (1) b) of the GDPR, if necessary the fulfillment of a legal obligation according to Art. 6 (1) c) of the GDPR. Furthermore, personal data is only processed on the basis of explicit consent (Art. 6 (1) a) of the GDPR).

In the processing, BellandVision uses auxiliary persons, such as IT service providers for setting up and maintaining the technical infrastructure or tax consultants in the area of payroll accounting. These are obliged to handle the data with care. We generally refuse to disclose your data to third parties in any other way, unless this is necessary for the provision of services or we are required to do so by law. Third parties in this context may be, for example: Auditors, experts and affiliated companies. A transfer of data to third countries outside the EU is not intended.

We process and store your personal data only as long as this is necessary to fulfill our contractual obligations or to secure claims within the statutory limitation periods. In addition, there may be legal obligations to retain data, for example under tax law. If such obligations exist, your data will be deleted at the end of these retention obligations.

9. Specific information on the use of video conferencing/webinar software

In addition, we process data provided for the use of the video conferencing software or the webinar software, in particular first name, last name, e-mail address, sound transmission, image transmission, questions when using chat functions. To the extent technically necessary, data from your system will be processed to establish the connection with the provider of the conference software. The purpose of processing is to conduct video conferences or webinars.

In the processing, BellandVision uses external service providers or other contractors, including for the purposes of data processing and hosting. The transfer of your data to third parties only takes place in cases where this is necessary for the provision of services, the data subject has given his consent, a transfer is already permissible due to overriding interest or we are legally obligated to do so, in particular vis-à-vis public authorities. Processors outside the European Union are used (here: United States of America). Correspondingly required standard contractual clauses have been concluded with the service providers.

Video conferences are only recorded with the previously documented consent of the participants. We process and store your personal data only as long as this is necessary to fulfill our contractual obligations. The duration of data storage is otherwise based on the statutory retention obligations and is generally 10 years.

10. Recipients or Categories of Recipients to whom the Data can be Transmitted

As we take data protection very seriously, we adhere to the legal stipulations and directives of the General Data Protection Regulation (GDPR) as well as of the German Data Protection Regulation (BDSG). Your data will be treated confidentially and protected from access by unauthorized third parties. That is also the reason why we generally reject the transfer of your data to third parties, unless it is necessary to provide services, to fulfill orders or to guarantee the technical availability and data security, or if we are legally obligated to do so. In this context, third parties may be for example: Financial auditors, experts, IT service providers, or affiliated companies, banks auditors and the Central Packaging Register Office. Whenever contractual partners of BellandVision do have access to your personally identifiable information for the purpose of providing a service, they are obligated by us to treat such information confidentially. Contractual partners are only allowed to use the data to fulfil their contractual obligations. Therefore, BellandVision asks all of its contractual partners to adhere to the respective data protection guidelines. By disclosing their information,

customers give BellandVision permission to transfer their data to its contractual partners for contractual purposes.

11. Mandatory Period for Deleting the Data

Legislation has made numerous provisions for record retention obligations and periods. Once those periods have expired, the data is routinely deleted. If those provisions do not apply to any given data, it will be deleted if their storage is no longer needed to fulfil the purposes stated in section C.

D. Rights of the Data Subject

In addition, you can assert your rights to information, correction or deletion or to restriction of processing or the exercise of your right to object to processing as well as the right to data portability at any time. Here you will find the possibility to contact us by e-mail or letter. You can find supplementary information and contact persons on data protection at <http://www.bellandvision.de/datenschutz.htm>. You also have the right to contact the data protection supervisory authority in the event of complaints.

E. Responsibilities of the User

The user is solely responsible for correctly inputting all details that he or his staff members have to enter into the portals that are made available on our website. The user himself shall be responsible for any false or incomplete data that has been entered by his employees. This also applies to adhering to the applicable privacy protection guidelines when entering data.

F. Liability

Liability for the loss of data is excluded, unless the data loss is the result of deliberate or gross negligence. Liability for damage due to injury of life, body or health will remain unaffected. Non-liability also applies to damage resulting from erroneous use of a given portal or service by the user. The obligation to ensure data protection pursuant to Art. 32 of the GDPR will remain unaffected hereby.

There is no obligation to check whether the rights of third parties are infringed when inputting data.

G. A Planned Data Transfer into Third Countries

No data transfer to third countries has been planned, unless otherwise clearly stated in this privacy policy, such as for example a transfer of data to the USA, as a result of using Google Analytics, YouTube or SurveyMonkey (confer C.2.a.; C.2.c.; C.3), Microsoft (Teams) or Qualtrics (see C.2.a.; C.2.c.; C.3), no data transfer to third countries is planned. It cannot be ruled out that the aforementioned service providers may also transfer, store and process data outside the scope of the GDPR, e.g. in the USA. They ensure data protection in these countries by means of standard contractual clauses approved by the European Commission.

H. Validity and Currentness of Data of this Privacy Policy

It is possible that this privacy policy will need to be changed at some point. Thus, BellandVision reserves the right to amend this privacy policy in the future, taking into account the applicable data protection guidelines at that time. We would, therefore, like to ask you to refer back to this privacy policy every once in a while. You also have the right to contact the data protection supervisory authority in the event of complaints.