



## EU Privacy Policy for Contracting Partners of MACO Group

### Fulfilment of the duty to provide information in accordance with Art. 12, 13, 14 and 21 GDPR

This document contains information on how your personal data is processed within the scope of the contractual relationship and your related rights under data protection law.

**1. Term: “contracting partner”:**

Contracting partners are customers, suppliers, service providers and other third parties that have entered into a contractual relationship with a MACO Group company.

**2. Definition of “personal data”:**

Personal data within the meaning of Art. 4 (1) GDPR is all data and information relating to an identified or identifiable natural person (hereinafter referred to as “data subject”). This includes name, addresses, contact details, phone number and IP address.

**3. Name and contact details of the controller within the meaning of Art. 4 (7) GDPR:**

The controller is always the MACO Group company with which the contract is concluded as well as the MACO Group company which processes the personal data within the scope of the contractual relationship. The MACO Group companies and their contact details are listed in **Annex ./1.**

**4. Data protection officer contact details:**

The MACO Group companies and their data protection officers are listed in **Annex ./1.**

**5. Processing purposes and legal bases:**

**Processing purposes:**

Your personal data is processed for the following purposes, but only to the extent required for performing the contractual relationship.

- Negotiating, concluding, performing and terminating contracts,
- Processing and invoicing orders,
- Supply logistics and management,
- Recording and checking the services provided,
- Supporting contractual partners,
- Standardised customer data management,
- Maintaining and defending our rights,
- Travel management.

**Legal bases:**

The legitimacy of the processing of your personal data is based on Art. 6 (1) lit. b) GDPR as the processing is required for fulfilling a contract and/or performing pre-contractual measures.

**6. Types and categories of personal data and data subjects:**

**Types and categories of personal data:**

Contact details (such as company, commercial register number, address, email address, phone number, title and name of contact person), business card details (such as name, title, position,



company), contractual data (such as contractual relationship, object of the contract) as well as invoicing and payment data (such as bank details and tax number).

**Data subject categories:**

- Customers,
- Suppliers,
- Service providers,
- Other third parties.

**7. Recipients or recipient categories:**

**Recipients:**

We transfer your personal data **within our company** exclusively to departments and persons requiring this data for the fulfilment of the contractual and legal obligations. The data is only transferred to recipients **outside the company** if permitted or required by law, if the transfer is required for processing and therefore fulfilling the contractual relationship and if we have your consent or we are authorised to provide information.

**Recipient categories:**

- Processor,
- Lawyers and debt collection agencies (for enforcing contractual claims).

**Processors:**

If, in certain cases, your personal data is processed by external service providers, data processing agreements are concluded in accordance with Art. 28 GDPR to ensure that the data is processed in accordance with the provisions of the GDPR and MACO's instructions.

**8. Transfer to third countries or international organisations:**

All of the controllers' and processors' data processing activities are performed in the EU, EEA and/or in countries that have the same level of data protection as the EU and EEA due to adequacy decisions made by the European Commission in accordance with Art. 45 GDPR. Data may only be transferred to third countries in accordance with the special requirements stated in Art. 44 et seqq. GDPR .

**9. Storage and/or archiving period:**

We generally only store personal data for as long as necessary to achieve the respective purpose stated above (for the duration of the entire contractual relationship). However, the data may be stored for longer periods if required for the fulfilment of legal obligations (until the expiry of the retention periods required under tax, company or VAT laws) or the assertion or defence of legal claims.



#### 10. **Rights of the data subject in accordance with the GDPR:**

Data subjects have the following rights:

- Right to be informed in accordance with Art. 13 and 14 GDPR,
- Right of access in accordance with Art. 15 GDPR,
- Right to rectification in accordance with Art. 16 GDPR,
- Right to erasure in accordance with Art. 17 GDPR,
- Right to restrict processing in accordance with Art. 18 GDPR,
- Right to data portability in accordance with Art. 20 GDPR,
- Right to withdraw previously issued consent at any time in accordance with Art. 7 (3) GDPR.

To assert these rights, please send an email to the email address of the respective data protection officer (see **Annex ./1**).

##### **Right to object:**

If we process your personal data in order to maintain legitimate interests within the meaning of Art. 6 (1) lit. f GDPR, you have the right, in accordance with **Art. 21 (1) GDPR**, to object to such processing on grounds arising from your specific situation. In accordance with **Art. 21 (2) GDPR**, you can object to the processing of your data for direct advertising purposes at any time.

To assert your right to object, please send an email to the email address of the respective data protection officer (see **Annex ./1**).

##### **Right to complain:**

If you believe that the processing of your personal data violates the GDPR, you have the right, in accordance with Art. 77 GDPR, to complain to the competent regulatory authority (see **Annex ./1**). However, before you complain to the regulatory authority, or if you have any questions relating to data protection, please contact the data protection officers listed in **Annex ./1** directly.

#### 11. **Duty to provide personal data:**

Personal data has to be provided for the conclusion of a contract.

#### 12. **Automated decision-making process, including profiling:**

No automated decision-making and profiling processes are applied when processing personal data for contracts.

#### 13. **Intent to process data for other purposes:**

The data is exclusively processed for the above-stated purposes.

#### 14. **Personal data source:**

The personal data is collected directly from the data subject.

As of: September 2023

## Annex ./1

### MACO GROUP companies, data protection officers, regulatory authorities

| No.: | MACO Group companies:                                | Contact details:  | Data protection officer:   | Regulatory authority:   |
|------|--|---|--|---|
| 1.   | Mayer & Co Holding GmbH, Austria                     | Mayer & Co Holding GmbH<br>Alpenstrasse 173<br>5020 Salzburg<br>Austria<br>Tel.: +43 662 6196-0<br>Email: <a href="mailto:maco@maco.eu">maco@maco.eu</a><br>Website: <a href="http://www.maco.eu">www.maco.eu</a>                               | Data protection officer<br>Email: <a href="mailto:dataprotection@maco.eu">dataprotection@maco.eu</a> | Austrian Data Protection Authority<br><a href="https://www.dsb.gv.at/">https://www.dsb.gv.at/</a> |
| 2.   | Mayer & Co Beschläge GmbH, Austria                   | Mayer & Co Beschläge GmbH<br>Alpenstrasse 173<br>5020 Salzburg, Austria<br>Tel.: +43 662 6196-0<br>Email: <a href="mailto:maco@maco.eu">maco@maco.eu</a><br>Website: <a href="http://www.maco.eu">www.maco.eu</a>                               | Data protection officer<br>Email: <a href="mailto:dataprotection@maco.eu">dataprotection@maco.eu</a> | Austrian Data Protection Authority<br><a href="https://www.dsb.gv.at/">https://www.dsb.gv.at/</a> |
| 3.   | MACO Baubeschlag Produktion & Betriebs GmbH, Austria | MACO Baubeschlag Produktions & Betriebs GmbH<br>Steindorf 67<br>5570 Mauterndorf im Lungau<br>Austria<br>Tel.: +43 662 6196-0<br>Email: <a href="mailto:maco@maco.eu">maco@maco.eu</a><br>Website: <a href="http://www.maco.eu">www.maco.eu</a> | Data protection officer<br>Email: <a href="mailto:dataprotection@maco.eu">dataprotection@maco.eu</a> | Austrian Data Protection Authority<br><a href="https://www.dsb.gv.at/">https://www.dsb.gv.at/</a> |
| 4.   | MACO Produktions GmbH, Austria                       | MACO Produktions GmbH<br>Industriestrasse 1<br>8784 Trieben<br>Austria<br>Tel.: +43 3615 3441-0<br>Email: <a href="mailto:maco@maco.eu">maco@maco.eu</a><br>Website: <a href="http://www.maco.eu">www.maco.eu</a>                               | Data protection officer<br>Email: <a href="mailto:dataprotection@maco.eu">dataprotection@maco.eu</a> | Austrian Data Protection Authority<br><a href="https://www.dsb.gv.at/">https://www.dsb.gv.at/</a> |
| 5.   | MACO Technologie GmbH, Austria                       | MACO Technologie GmbH<br>Alpenstrasse 173<br>5020 Salzburg<br>Austria<br>Tel.: +43 662 6196-0<br>Email: <a href="mailto:maco@maco.eu">maco@maco.eu</a><br>Website: <a href="http://www.maco.eu">www.maco.eu</a>                                 | Data protection officer<br>Email: <a href="mailto:dataprotection@maco.eu">dataprotection@maco.eu</a> | Austrian Data Protection Authority<br><a href="https://www.dsb.gv.at/">https://www.dsb.gv.at/</a> |

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|-----|--|---|--|---|
| 6.  | MACO Industrieanlagen GmbH, Austria        | MACO Industrieanlagen GmbH<br>Alpenstrasse 173<br>5020 Salzburg<br>Austria<br>Tel.: +43 662 6196-0<br>Email: <a href="mailto:maco@maco.eu">maco@maco.eu</a><br>Website: <a href="http://www.maco.eu">www.maco.eu</a>  | Data protection officer<br>Email: <a href="mailto:dataprotection@maco.eu">dataprotection@maco.eu</a>         | Austrian Data Protection Authority<br><a href="https://www.dsb.gv.at/">https://www.dsb.gv.at/</a>   |
| 7.  | MACO Vertriebsgesellschaft m.b.H., Austria | MACO Vertriebsgesellschaft m.b.H.<br>Alpenstrasse 173<br>5020 Salzburg<br>Austria<br>Tel.: +43 662 6196-0<br>Email: <a href="mailto:maco@maco.eu">maco@maco.eu</a><br>Website: <a href="http://www.maco.eu">www.maco.eu</a>   | Data protection officer<br>Email: <a href="mailto:dataprotection@maco.eu">dataprotection@maco.eu</a>         | Austrian Data Protection Authority<br><a href="https://www.dsb.gv.at/">https://www.dsb.gv.at/</a>   |
| 8.  | MyMACO Service GmbH, Austria               | myMACO Service GmbH<br>Alpenstrasse 173<br>5020 Salzburg<br>Austria<br>Tel.: +43 662 63 60 00<br>Email: <a href="mailto:service@mymaco.eu">service@mymaco.eu</a><br>Website: <a href="http://www.maco.eu">www.maco.eu</a> ,<br><a href="http://www.mymaco.eu">www.mymaco.eu</a> | Data protection officer<br>Email: <a href="mailto:dataprotection@maco.eu">dataprotection@maco.eu</a>         | Austrian Data Protection Authority<br><a href="https://www.dsb.gv.at/">https://www.dsb.gv.at/</a>   |
| 9.  | MACO HAUTAU Deutschland GmbH, Germany      | MACO HAUTAU Deutschland GmbH<br>Haidhof 3<br>94508 Schöllnach<br>Germany<br>Tel.: +49 9903 9323-0<br>Email: <a href="mailto:info@maco-hautau.de">info@maco-hautau.de</a><br>Website: <a href="http://www.maco-hautau.de">www.maco-hautau.de</a>                                 | Data protection officer<br>Email: <a href="mailto:dataprotection-DE@maco.eu">dataprotection-DE@maco.eu</a>   | Federal Commissioner for Data Protection and Freedom of Information<br><a href="http://BfDI-homepage.bund.de">BfDI – homepage (bund.de)</a> |
| 10. | Maico GmbH, Italy                          | MAICO GmbH<br>Holzländestrasse 15<br>39015 St. Leonhard in Passeier<br>Italy<br>Tel.: +39 0473 651200<br>Email: <a href="mailto:info@maico.com">info@maico.com</a><br>Website: <a href="http://www.maico.com">www.maico.com</a>   | Data protection officer<br>Email: <a href="mailto:dataprotection-IFE@maco.eu">dataprotection-IFE@maco.eu</a> | Italian Data Protection Authority<br><a href="https://www.gpdp.it/web/guest/home/">https://www.gpdp.it/web/guest/home/</a>                  |
| 11. | Maco Ferrures Sarl., France                | MACO Ferrures SARL<br>19 Rue des Frères Lumière<br>67201 Eckbolsheim<br>France<br>Tel.: +33 3 90 20 28 40<br>Email: <a href="mailto:maco-ferrures@maco.fr">maco-ferrures@maco.fr</a><br>Website: <a href="http://www.maco.eu">www.maco.eu</a>                                   | Data protection officer<br>Email: <a href="mailto:dataprotection-IFE@maco.eu">dataprotection-IFE@maco.eu</a> | CNIL - National Commission on Informatics and Liberty<br><a href="https://www.cnil.fr/">https://www.cnil.fr/</a>                            |

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|-----|--------------------------------------|--|--|--|
| 12. | Maco Herrajes, S.L., Spain           | Maco Herrajes, S.L., San Sebastian Barrio De Peruri 33 - Oficina 1º D, 48940 Lejona, Vizcaya Spain<br>Tel.: +34 944 002 533<br>Email: info@maco-herrajes.es<br>Website: <a href="http://www.maco.eu">www.maco.eu</a>   | Data protection officer<br>Email: <a href="mailto:dataprotection-IFE@maco.eu">dataprotection-IFE@maco.eu</a>       | Spanish Data Protection Authority<br><a href="https://www.aepd.es/es">https://www.aepd.es/es</a>   |
| 13. | Maco Door & Window Hardware Ltd., UK | Maco Door & Window Hardware Ltd. Eurolink Industrial Centre, Castle Road Sittingbourne, Kent, ME10 3LY United Kingdom<br>Tel.: +44 1795 433900<br>Email: <a href="mailto:enquiry@macouk.net">enquiry@macouk.net</a><br>Website: <a href="http://www.maco.eu">www.maco.eu</a> | Data protection officer<br>Email: <a href="mailto:dataprotection-UK@maco.eu">dataprotection-UK@maco.eu</a>         | Information Commissioner's Office<br><a href="https://ico.org.uk/">https://ico.org.uk/</a>   |
| 14. | Maco Beschläge B.V., Netherlands     | Maco Beschläge B.V., Zelhem Stikkenweg 60, 7021BN Zelhem Netherlands<br>Tel.: +31 314 659700<br>Email: <a href="mailto:verkoop@maco.eu">verkoop@maco.eu</a><br>Website: <a href="http://www.maco.eu">www.maco.eu</a>   | Data protection officer<br>Email: <a href="mailto:dataprotection-NL@maco.eu">dataprotection-NL@maco.eu</a>         | Dutch DPA<br><a href="https://autoriteitpersoonsgegevens.nl/nl">https://autoriteitpersoonsgegevens.nl/nl</a>                                     |
| 15. | TOV MAKO-FURNITURA, Ukraine          | TOV MAKO-FURNITURA 21-B Verkhovna Rada Blvd. 02094 Kiev Ukraine<br>Tel.: +38044 298 20 65<br>Email: <a href="mailto:ua.office@maco.eu">ua.office@maco.eu</a><br>Website: <a href="http://www.maco.eu">www.maco.eu</a>  | Data protection officer<br>Email: <a href="mailto:dataprotection-UA@maco.eu">dataprotection-UA@maco.eu</a>         | Ukrainian Parliament Commissioner for Human Rights – Data Protection Office<br><a href="https://ombudsman.gov.ua/">https://ombudsman.gov.ua/</a> |
| 16. | MACO Ungarn Kft., Hungary            | MACO Ungarn Kft. Office address: Szent László u. 15, H-2085 Pilisvörösvár. Warehouse address: Egri u. 26, H-3360 Heves.<br>Tel.: +36207726651<br>Email: <a href="mailto:MacOUngarn@maco.eu">MacOUngarn@maco.eu</a><br>Website: <a href="http://www.maco.eu">www.maco.eu</a>  | Data protection officer<br>Email: <a href="mailto:dataprotection-ungarn@maco.eu">dataprotection-ungarn@maco.eu</a> | Hungarian National Authority for Data Protection and Freedom of Information<br><a href="http://www.naih.hu">www.naih.hu</a>                      |
| 17. | Maco Polska Sp.z.o.o., Poland        | Maco Polska Sp.z.o.o. Jana Gutenberga 18 44-109 Gliwice Poland<br>Tel.: +48 (32) 30 12 330<br>Email: <a href="mailto:info@maco.pl">info@maco.pl</a><br>Website: <a href="http://www.maco.eu">www.maco.eu</a>   | Data protection officer<br>Email: <a href="mailto:dataprotection-PSC@maco.eu">dataprotection-PSC@maco.eu</a>       | Personal Data Protection Office<br><a href="http://www.uodo.gov.pl">www.uodo.gov.pl</a>  |

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|-----|----------------------------------|---|--|---|
| 18. | Maco Kovanie s.r.o., Slovakia    | Maco Kovanie s.r.o.<br>Mostná 62,<br>949 01 Nitra<br>Slovakia<br>Tel.: + 421 37 6422566<br>Email: <a href="mailto:cz.office@maco.eu">cz.office@maco.eu</a><br>Website: <a href="http://www.maco.eu">www.maco.eu</a>   | Data protection officer<br>Email: <a href="mailto:dataprotection-PSC@maco.eu">dataprotection-PSC@maco.eu</a> | Office for Personal Data Protection of the Slovak Republic<br><a href="https://dataprotection.gov.sk/uoou/">https://dataprotection.gov.sk/uoou/</a> |
| 19. | Maco Kování s.r.o., Czechia      | Maco Kování s.r.o.<br>Turanka 1222/115,<br>627 00 Brno<br>Czechia<br>Tel.: +420 549 248847<br>Email: <a href="mailto:cz.office@maco.eu">cz.office@maco.eu</a><br>Website: <a href="http://www.maco.eu">www.maco.eu</a>  | Data protection officer<br>Email: <a href="mailto:dataprotection-PSC@maco.eu">dataprotection-PSC@maco.eu</a> | Personal Data Protection Office<br><a href="http://www.uoou.cz/en/">www.uoou.cz/en/</a>   |
| 20. | Maco Obkovi EOOD, Bulgaria       | Maco Obkovi EOOD<br>Akad. Ivan Evst., Geschov,<br>Boulevard 104, Office 3,<br>1612 Sofia<br>Bulgaria<br>Tel.: +43 662 6196-0<br>Email: <a href="mailto:maco@maco.eu">maco@maco.eu</a><br>Website: <a href="http://www.maco.eu">www.maco.eu</a>  | Data protection officer<br>Email: <a href="mailto:dataprotection-BHR@maco.eu">dataprotection-BHR@maco.eu</a> | Commission for Personal Data Protection<br><a href="http://www.cdpd.bg/en/">www.cdpd.bg/en/</a>   |
| 21. | Maco okovi d.o.o., Croatia       | Maco okovi d.o.o.<br>Tržna 12,<br>10290 Zaprešić<br>Croatia<br>Tel.: +385 (0)1 55 15 915<br>Email: <a href="mailto:hr.office@maco.eu">hr.office@maco.eu</a><br>Website: <a href="http://www.maco.eu">www.maco.eu</a>  | Data protection officer<br>Email: <a href="mailto:dataprotection-BHR@maco.eu">dataprotection-BHR@maco.eu</a> | Croatian Personal Data Protection Agency<br><a href="https://azop.hr/">https://azop.hr/</a>   |
| 22. | Maco After Sales s.r.l., Romania | Maco After Sales s.r.l.<br>Piata Montreal nr.10, Cladirea World<br>Trade Center, Intrarea F, et. 1, birou<br>1.38, campus 46, sector 1<br>011469 Bucuresti<br>Romania<br>Tel.: +43 662 6196-0<br>Email: <a href="mailto:maco@maco.eu">maco@maco.eu</a><br>Website: <a href="http://www.maco.eu">www.maco.eu</a> | Data protection officer<br>Email: <a href="mailto:dataprotection-BHR@maco.eu">dataprotection-BHR@maco.eu</a> | National Supervisory Authority for the Processing of Personal Data<br><a href="http://www.dataprotection.ro">www.dataprotection.ro</a>              |
| 23. | HAUTAU GmbH, Germany             | HAUTAU GmbH<br>Wilhelm-Hautau-Strasse 2<br>31691 Helpsen, Germany<br>Tel.: +49 5724 3930<br>Email: <a href="mailto:info@hautau.de">info@hautau.de</a><br>Website: <a href="http://www.hautau.de">www.hautau.de</a>  | Data protection officer<br><a href="mailto:Datenschutz@HAUTAU.de">Datenschutz@HAUTAU.de</a>                  | Federal Commissioner for Data Protection and Freedom of Information<br><a href="http://BfDI-homepage(bund.de)">BfDI – homepage (bund.de)</a>        |