

## Information about the processing of personal data

Below we would like to inform you about the collection and processing of your personal data in connection with the business relationship with Eberspaecher Sp.z o.o. and your rights in this regard.

**Controller.** The entity responsible for the collection and processing of your personal data is **Eberspächer Sp. z o. o. ul. Okrężna 17 , 62-081 Przeźmierowo** (hereinafter referred to as "Eberspaecher" or "Administrator"), phone +48 618 161 850, e-mail: [info-pl@eberspaecher.com](mailto:info-pl@eberspaecher.com)

1. **Data Protection Officer.** The contact details of the Eberspächer Group Data Protection Officer are as follows:  
**Eberspächer Climate Control Systems GmbH & Co. KG**  
**Data Protection Officer**  
**Eberspächerstraße 24**  
**73730 Esslingen**  
**E-mail:** [datenschutz@eberspaecher.com](mailto:datenschutz@eberspaecher.com).

If you have any questions about data protection at Eberspaecher, please contact our data protection coordinator:

**Marcin Mroziak**

**e-mail:** [privacy-ESPZ@eberspaecher.com](mailto:privacy-ESPZ@eberspaecher.com)

2. **Data processing in connection with business relationships with Eberspaecher.** As part of our business relationship with Eberspaecher, we process personal data about you or your employees. Your provision of personal data is voluntary, but may be necessary for the conclusion and execution of the contract.
  - a. **Contact with customers and partners.** As part of our cooperation, we process information about your company (in particular, addresses, authorized representatives and their contact information), information about individual contact persons (in particular, name, position, business contact information) and all communications with you. We use this data to be able to contact the appropriate contact person, to process your requests and orders accordingly, and to maintain our business relationship. The legal basis is Article 6(1)(b) of the GDPR if you are contacting on your own behalf, or Article 6(1)(f) of the GDPR if you are acting on behalf of your employer.
  - b. **Procurement, order management and invoicing.** As part of order processing and billing, we collect information contained in offers, orders and invoices, as well as bank details. In this context, contact information of contact persons may also be processed. The legal basis is Article 6(1)(b) GDPR if you are contacting on your own behalf, or Article 6(1)(f) GDPR if you are acting on behalf of your employer.

If necessary, in accordance with our Group's standards, we receive information from a credit agency about your company's creditworthiness. This inquiry is carried out on the basis of the company data provided and serves us to better assess liquidity in order to minimize the risk of default. Our Group works with Creditreform Stuttgart Strahler KG (Theodor-Heuss-Str. 2, 70174 Stuttgart) or CRIF Bürgel GmbH, Ndl. Stuttgart (Am Wallgraben 100, 70565 Stuttgart). Information on data processing by the respective credit agency can also be found in a separate information sheet pursuant to Article 14 of the GDPR on the respective credit agency's website:

Creditreform: <https://en.creditreform.de/eu-gdpr.html>

Bürgel: <https://www.crifbuergel.de/en/privacy>

The legal basis for the aforementioned data processing is Article 6(1)(f) GDPR, based on our legitimate interest explained above.

- c. **Fulfillment of legal obligations.** Your personal data may be processed in order to fulfill legal obligations incumbent on the Administrator, in particular obligations under tax law or civil law. The basis for processing in this regard is Article 6(1)(c) of the GDPR.
  - d. **Promotional purposes and newsletters.** We may use your company and contact information and, in special cases, information about previous orders to send you further information about our products and services that are relevant to you, as well as relevant news, promotions and offers. We will send them to you by mail or e-mail. In order to contact you by e-mail, we will use the contact information you have provided to us. You may object to the use of your data for advertising purposes at any time by notifying us using the contact information specified in Section 1 (e.g., by email or letter). The legal basis is Article 6(1)(f) of the GDPR. In the future, we may also offer a Newsletter to inform you about our products and services, news, promotions and offers. You will be able to unsubscribe from the Newsletter at any time via the unsubscribe link included in the newsletter or by sending a short message to the unsubscribe address provided in the newsletter. The legal basis for the above data processing is Article 6(1)(a) GDPR, i.e. voluntary consent.
  - e. **Product liability and warranty** We process your data for legal claims and defense in legal disputes. In order to process legal and contractual claims, we may need information about contractual products, their installation and use, as well as invoice information. In addition to your Company and contact information, information about end customers contained in submitted invoice and order documentation may also be processed as part of the claim verification process. The legal basis is Article 6(1)(f) GDPR, i.e. the Administrator's legitimate interest.
  - f. **Supervision and reporting.** We also use the information contained in orders and invoices for internal cost and performance recording, control and internal reporting, which serves us to manage and develop company strategy. The legal basis for this is Article 6(1)(f) of the GDPR. Personal data is not usually processed in this context.
3. **Recipients of data.** As a rule, contact data will only be processed by Eberspaecher and will not be transferred to third parties. In some cases, data is transferred within the Eberspaecher Group of companies. This is the case when a group company provides certain services to us or when there are joint framework agreements. In addition, data is transferred in cases where the legislature requires it or imposes an obligation to do so (e.g., as part of a tax audit conducted by the tax authorities or as part of the prevention of money laundering). In some cases, disclosure of your

data to third parties is necessary to protect your or our interests or to fulfill our contractual obligations. Such data transfers occur in particular when we have introduced third-party service providers into our internal processes. In such cases, the service provider is bound by instructions and receives data only to the extent and for the duration necessary to provide services in each case. In some cases, we also employ external consultants and auditors. In order to ensure the confidentiality of all information, appropriate agreements are always entered into with them.

4. **Storage period.** The data are kept as long as they are necessary to fulfill the described purpose and for the period in which it is permissible to assert claims arising from the business relationship, or the storage is necessary to fulfill legal obligations, especially in the field of accounting.

5. **Data integrity**

We have implemented appropriate security measures to protect your personal data from accidental loss, unauthorized use, alteration or disclosure, or unauthorized access. In addition, only those employees who need your data to fulfill the purposes for which we obtained the data have access to it. Data will be processed only in accordance with our instructions, and all employees are subject to confidentiality obligations. We have implemented a policy for dealing with data breaches and, as required by law, we will inform you and any responsible authority of such a breach.

6. **Your rights.** You have a number of rights under data protection laws. You have the right at any time to request to see the data we have stored and to correct it if necessary. You may also request the deletion of your data. The processing of your personal data may also be restricted if, for example, you have doubts about the legal basis for the processing. You also have the right to transfer your data, i.e. we will send you a digital copy of the personal data you have provided upon request. In addition, we are obliged to inform you of your right to lodge a complaint with the competent supervisory authority for personal data protection, i.e. the Office for Personal Data Protection (2 Stawki Street, 00-193 Warsaw, <https://uodo.gov.pl>).

You have the right to object to the use of your data for advertising purposes. You may revoke any consent at any time. In order to assert your rights, please contact us using the details indicated in section 1 above or our data coordinator.

Date: 01.01.2024.