

## Langmatz privacy policy

### Preamble

This privacy policy provides Langmatz GmbH with a binding framework for the legally compliant and lasting protection of personal data and thus the privacy of all persons involved in our business processes. The aim of this policy is to create a uniformly high level of data protection throughout the company that meets the expectations of all those involved and complies with the legal requirements of the EU General Data Protection Regulation (GDPR), the German Federal Data Protection Act (BDSG) and other relevant regulations.

### Scope of application

The privacy policy regulates the handling of personal data in connection with the company's business activities as well as establishing the employment relationship with employees. It is binding for all employees and other parties involved in the business activity and remains valid until it expires or is replaced by a newer version.

Notwithstanding the provisions made herein, the statutory provisions of the EU General Data Protection Regulation (GDPR) and the Federal Data Protection Act (BDSG), as amended, apply.

### Aims of data protection and this privacy policy

Under law, four protection goals must be taken into account for each category of data when processing personal data:

- Confidentiality (data are only accessible to authorised persons)
- Integrity (the data/systems are correct, unchanged and reliable)
- Availability
- Robustness/resilience of the systems

All responsible bodies are obligated to take appropriate measures to ensure that personal data are protected against unauthorised access, unlawful processing or disclosure, loss or destruction, and against falsification, manipulation or accidental alteration. This applies regardless of whether the data processing is effected electronically or in paper form.

## Self-commitment

The management and employees are aware of their responsibility in dealing with personal data. We observe the relevant laws, contractual regulations and internal guidelines. We understand that data protection protects personal data as well as business secrets and thus contributes to the protection of the privacy of all parties involved and the economic existence of the company.

The company is committed to a high standard of quality. Technical and organisational measures are carefully developed, implemented and regularly reviewed to the best of our knowledge and belief.

Compliance with data protection regulations by each individual employee is promoted through continuous sensitisation, confidentiality obligations, data protection-compliant workplace design as well as work/procedural instructions.

## Definitions

- **Data subjects:**

Contacts, customers and employees whose personal data are processed in connection with the business activity or employment relationship.

- **Data collection:**

Collection of data on the data subject.

- **Data processing:**

Collecting, recording, organising, arranging, storing, adapting or modifying, reading out, querying, using, disclosing by transmission, distributing or making available in another form, comparing or linking or restricting the processing, as well as erasing or destroying personal data.

- **Data controller**

A 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.

## Rules of conduct in detail

- **Purpose/responsibility**

As a matter of principle, personal data may only be processed by the controller(s) for the purpose of establishing, implementing and terminating a business relationship and an employment relationship.

In principle, the processing may only be effected within the scope of the purpose known to the data subjects. The purpose may only be changed or extended if it is legally permissible and the data subjects have been informed of this or if the data subjects have given their consent.

- **Storage period**  
The employee must ensure that personal data are stored in a form which permits identification of data subjects for no longer than is necessary for the purposes of the processing, unless longer storage periods are required by law.
- **Data quality**  
The employee must ensure that the existing personal data are up to date and correct in terms of content. Data that is inaccurate or incomplete must be corrected, deleted or its processing restricted without delay. Anonymised data are excluded from these regulations.
- **Data protection-compliant system design**  
If a new IT program or a new data collection process is introduced, the data protection officer must be informed in advance.
- **Data security**  
The employee must take appropriate measures to ensure that only authorised persons have access to personal data. Means to this end include, for example, a consistent clean desk policy, locking computers and always locking cabinets and office rooms when leaving the office.
- **Risk assessment and data protection impact assessment**  
If there is any doubt about the lawfulness of the processing, the supervisor must be informed. The supervisor must ensure lawfulness in consultation with the data protection officer and then report the result of the inspection to the employee. If the supervisor does not take measures regarding the inspection of the lawfulness of the processing, the employee must contact the data protection officer directly.
- **Handling of data protection incidents**  
In the event of a personal data breach, the employee must notify the data protection officer immediately after becoming aware of the breach. The data protection officer then takes over communication with the data subjects and the data protection authorities.
- **Safeguarding the rights of data subjects**  
If a data subject contacts an employee and asserts their rights against Langmatz GmbH, the employee must inform the data protection officer immediately. The data protection officer then takes over communication with the claimant.

Garmisch-Partenkirchen, 27.11.2023

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