

## Information sheet on data protection

Thank you for your interest in our company. Among other things, we take your rights to privacy, data protection and informational self-determination very seriously. Therefore, we would like to inform you about the following:

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| <p>Who are we? (Responsible person)</p> <p>TDK-Lambda Germany GmbH<br/>         Representative: Mr. Gustav Erl<br/>         Karl-Bold-Straße 40+42<br/>         77855, Achern<br/>         Phone: 07841 666-0<br/>         Fax: 07841 50 00<br/>         E-mail: <a href="mailto:info.germany@de.tdk-lambda.com">info.germany@de.tdk-lambda.com</a><br/>         Website: <a href="http://www.emea.lambda.tdk.com/de/">www.emea.lambda.tdk.com/de/</a></p> | <p>Who is the data protection officer?</p> <p>Celina Bohnert<br/>         Karl-Bold-Straße 40<br/>         77855, Achern<br/>         Phone: 07841 666-0<br/>         E-mail: <a href="mailto:datenschutz@de.tdk-lambda.com">datenschutz@de.tdk-lambda.com</a></p> |
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## Overview data collection

| Data-categories                   | Sources   | Processing description   | Purposes  | Storage period  | Legal basis   |
|-----------------------------------|---|--|---|---|---|
| Identity-data,<br>Contact details | Your details, if applicable the details of your company | Recording/support of contact data (in the CRM system <sup>1</sup> ), customer project planning, delivery to customers, order processing/re-invoicing/credit note, support of customer portals, creation of project plans and offers, parts planning, determination of external parts and prototype creation with customers, customer training courses. | Establishing, implementing and terminating the debt relationship (maintaining contacts, preparing quotations/project support, outsourcing and delivery of goods, processing/controlling/monitoring customer orders, ensuring delivery capability, manufacturing systems according to customer requirements, technical support for customers and sales in the use of power supplies) | <ul style="list-style-type: none"> <li>• Upon conclusion of the contractual relationship: until the expiry of the retention period, usually 10 years after the end of the contractual relationship.</li> <li>• Other cases: until expiry of the retention period, usually 10 years after the end of the initiation relationship.</li> </ul> | Article 6 paragraph 1 lit. b GDPR                     |
|                                   |   | Customer survey (voluntary!)   | Information about our services (voluntary!)   |   | Article 6 paragraph 1 lit. a (voluntary information!) |
|                                   |   | Recording trade fair leads   | Check qualification of new customers  |   | Article 6 paragraph 1 lit. b GDPR                     |
|                                   |   | Master data maintenance  | Ensure that the data is up to date  |   | Article 6 paragraph 1 lit. b GDPR                     |
|                                   |   | Verify customer details, add to WEB RMA system, create delivery note/invoice/cost estimate for return of goods.  | Complaint handling  |   | Article 6 paragraph 1 lit. b GDPR                     |
|                                   |   | Send product news  | Informing new customers, prospects and existing customers about products that are relevant to you, improving customer relations, targeted product marketing   | Until your objection  | §7 UWG, Article 6 paragraph 1 lit. f GDPR             |

<sup>1</sup> When combining private and business content - e.g. in email correspondence - private information is also stored in our CRM system and thus made accessible to employees. If this is to be prevented, private and business content must be clearly separated.

**Are we obliged to collect this data?****What happens if we do not collect this data?**

There is no legal obligation to collect this data. However, it is possible that the absence of some or all data may occasionally lead to enquiries or make a contractual relationship impossible.

**To whom do we transmit the data?****Does the data leave the European Union or the European Economic Area?**

Currently, we may only transfer your data to our UK facility if order processing will take place at that location. For the processing of data within the Intercompany TDK-Lambda Group in the EU and outside the EU, a contract is in place that confirms the required level of data protection in accordance with the GDPR for all countries concerned. If further external recipients are to receive your data, we will carefully select and verify them and contractually bind them in accordance with the legal requirements.

**What rights do you have?**

You have the right to information about the personal data processed about you as well as to correction and deletion, to restriction of processing, to objection to processing and to data portability. Furthermore, you have the possibility to complain about us to the supervisory authority responsible for us. We would like to point out that these rights may be subject to conditions, which we will insist on.

**Legitimate interest, order processing, contract business**

We use your address to process your order or contract, including all activities that this purpose entails (see table above). In doing so, we rely on Article 6 paragraph 1 lit. f GDPR. According to this provision, processing is lawful if the processing is necessary to protect the legitimate interests of the controller or a third party, unless such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data.

The interests of the company (ensuring the existence of a profitable business, carrying out the core activity, satisfying customer needs) outweigh the possible interests of the data subject (disclosing as little data as possible to minimise the risk of a data breach).

However, you can of course object to the processing of personal data for order or contract processing at any time. Please send your objection to the above-mentioned data protection officer. We will record your objection in our CRM customer system and take it into account for the future!

However, we would also like to point out that we cannot enter into a business relationship with you if you object to data processing for the purpose of order or contract processing, or that the missing information makes a contractual relationship impossible.

**Legitimate interest, sending product news**

In addition to processing the contract, we use your address to send you product news. We base this processing of your data on Section 7 of the German Unfair Competition Act (UWG), which states that the controller may only send product advertising on the basis of explicit consent or presumed consent, as well as on Article 6(1) lit. f GDPR. According to this provision, processing is lawful if the processing is necessary to protect the legitimate interests of the controller or a third party, unless such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data.

In this context, the first indication of our overriding interest is the 47th recital to the GDPR, which states that the processing of personal data for the purposes of direct marketing can be considered as processing serving a legitimate interest.

In addition, we rely on the short paper No.3 of the independent data protection authorities of the Federation and the Länder (Data Protection Conference DSK) of 17.12.2018 entitled "Processing of personal data for advertising", in which the supervisory authorities point out the following: "In future, the basis for assessing the permissibility of advertising, apart from consent, will be a balancing of interests pursuant to Art. 6 (1) lit. f GDPR. The starting point for the balancing decision to be made is recital (Recital) 47 of the GDPR [...]".

The interests of the company (improvement of the customer relationship, acquisition of new customers, direct/personal approach, targeted product marketing taking into account the legal requirements from §7 UWG and the GDPR) outweigh the possible interests of the data subject (no spam mails, minimise the risk of receiving unrecognised fake mails or phishing mails, only own initiative in case of interest in new products).

However, you can of course object to the sending of product news at any time. Please send your objection to the above-mentioned data protection officer. We will record your objection in our CRM customer system and take it into account for the future!

**Privacy policy**

For more information, please see the privacy policy on our website:

<https://www.emea.lambda.tdk.com/de/legal/privacy-policy.aspx>

Thank you very much!