



WALLEM PRIVACY NOTICE

for Wallem websites and internet services

1.1. INTRODUCTION

Wallem Group, including its affiliates, is committed to respect privacy of its websites and internet services users and to comply with applicable data protection and privacy laws. The purpose of this Privacy Notice is to explain how Wallem Group and its authorised partners and affiliates (herein referred as 'we', 'Wallem' or 'Company') process your personal data related to Wallem's websites and internet services ('websites').

We reserve the right to update this Privacy Notice as we regularly need to develop our business processes, related policies, and follow up the changing personal data legislation. Please review this Privacy Notice from time to time for any amendments.

Contact details

We have appointed a data protection team which is responsible for overseeing questions in relation to this Privacy Notice. If you have any questions regarding this Privacy Notice or the use of your personal data in Wallem, please contact the data protection team using the details set out below:

Full legal entity name: Wallem Group Limited

Postal address: 9/F Dorset House, Taikoo Place, 979 King's Road, Quarry Bay Hong Kong

Data Protection Team email: wallemdpt@wallem.com

Data Protection Officer for the European market:

Mrs Vera Meyer Rachner

Phone: +49 40 / 37 022 05 00

E-mail: VMR@wallem.com

THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified.

Data provided by you

In connection with registration to our services, contact inquiries, subscriptions, surveys, or other such relationship, we collect personal data that you have provided to us at the time of the operation with Wallem, including e.g.:

- Contact details (name, address, telephone number, email address, city of residence and country of origin)
- User name in relation to online services

- Possible feedback and inquiry messages provided by you
- Marketing data which includes your preference in receiving marketing materials and information from us, for example subscription or opting out from receiving any marketing from us
- Any other information that may be provided by you personally to Wallem

Observed data about your online usage

When visiting Wallem's websites, observed data about your online usage is collected. The data is collected using [cookies](#) and other similar technologies and includes e.g.:

- Webpages visited by the user
- Website the user accessed Wallem's websites from
- The device model
- The channel through which the service is accessed (web browser, mobile browser, application, etc.)
- Browser version
- Operating System
- IP address
- Session identifier
- Session time and duration
- Geographical location data
- Date and time
- Screen resolution
- Clicks, scrolling, etc.

PURPOSE OF PROCESSING

The purpose of processing your personal data is to

- Communicate between us and you and reply to your contact requests, inquiries and feedback
- Ensure an efficient and secure use of our websites and services
- Improve our websites and website user experience
- Provide customized services and content recognizing your specific needs and interests
- Enable access to your user accounts
- Provide marketing information for Wallem solutions and services via targeted e-mails or interpersonal communication
- To manage our customer relationships which may include asking you to leave a review or to take survey
- Conduct research and collect statistics (e.g. what sections of our websites the users visit and how much time they spend on the websites)
- To use data analytics to improve our solutions and services and customer experience



Legal basis for processing your personal data:

- Fulfilling contractual relations between you and Wallem (e.g. contacting you in relation to subscriptions and registrations)
- Legitimate interest of Wallem (observing your website usage in order to ensure an efficient and secure use of our websites, to develop our services, to provide customised content to make our services more relevant to you, to provide marketing materials and to collect statistics)
- Your consent - your consent will be asked in relation to using website cookies. You will find additional information on [how cookies are used](#) in this Privacy Notice.

MARKETING AND OPTING OUT

You will receive marketing communications from us if you have requested information from us or purchased solutions or services from us, or if you provided us with your details directly (for example, via online subscription form, at a trade show, etc.), and in each case you have not opted out, or unsubscribed, of receiving marketing materials from us. You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing messages sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a solution or service purchase, and will not affect continuous business relations, etc.

STORING PERSONAL DATA

We handle your personal data that you have provided to us separately from observed data about online service use (for example, details you provided to us when subscribing to the online Wallem magazine) and derived data, in separate databases. Observed or derived data about service usage is always stored in a way that users cannot be personally identified from the identifiers as the identifiers are generated randomly.

Your personal data is stored as long as necessary in relation to the purposes for which the personal data was collected, unless there is a legal obligation to retain the personal data longer (e.g. in case of an ongoing legal proceeding).

DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we authorize access to your personal data to those employees, agents and contractors and other third parties who have a business need to know (for example, Marketing department will utilize your data to send out marketing materials you opted in to receive). They will only process your personal data on our instructions, and they are subject to duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.



ANALYTICS SERVICES

Wallem uses the services of Google Analytics, a web analytics service provided by Google Inc. Data collected by cookies about your use of our websites, solutions and services, including your IP address, will be transmitted to and stored by Google on behalf of Wallem. Wallem uses such analytics services for the purpose of evaluating website performance, usage, and providing other services relating to website activities and internet usage.

According to Google, they will in no event connect your IP address with other of Google's data.

To prevent your data from being used by Google Analytics, you can opt out by following the instructions provided here <https://tools.google.com/dlpage/gaoptout>

THIRD PARTY SERVICES

We use third-party services to display online advertisements on behalf of Wallem across the Internet. These service providers may use cookies to collect information about your visits to our websites in order to display ads while you are visiting other websites. This information cannot be used to identify you individually, the information is anonymous, however your IP address may be collected.

Our websites may contain links to other websites and 'share' and/or 'like' buttons, such as Twitter, Facebook, and other social media platforms, that are not operating on Wallem's behalf. Such websites, service or application providers may place their own third-party cookies on users' computers and other devices, collect data, or solicit personal information.

Issuers of such third-party cookies have their own privacy policies. You should refer to any privacy policies from such websites, service or application providers to better understand how your information may be collected and used.

COOKIES

When you visit our websites, cookies that contain information used to track your usage of our websites are stored on your device, provided that you have accepted the use of cookies in your browser. This enables our systems to recognise your browser and tell us how, when and which pages in our websites are visited and by how many people, and also enables us to recognise a return visitor as a unique user. Cookies placed by the Websites cannot access, read or modify any other data on your device.

We use the following cookies on our websites:

System cookies

The content managements system (CMS) used to maintain our websites is called WordPress. WordPress uses cookies necessary for the operation of our websites. For a full list, please see <https://wordpress.org/about/privacy/cookies/>

Analytical cookies

We use website analytics for the purpose of evaluating usage, count the number of visitors and see how visitors navigate on our websites when using them. More information about how Google Analytics use cookies can be found

at <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

Targeting cookies

These cookies record your visit to our websites, the pages you have visited and the links you have followed. We will use this information to make our websites and the content displayed on it more relevant to your interests.

Electronic marketing

If you have a professional relationship with us or have given your consent to receive marketing messages from Wallem, we may use your e-mail address to send you electronic marketing information.

How do you disable cookies?

You can control the use of cookies when you visit our websites. You can block use of cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our websites, or fully access the services or their features. [Read more about disabling cookies in your browser.](#)

Please note that if you have consented to the usage of cookies, you can withdraw your consent at any time by clearing your browser's data. [Read more about clearing your browser's data here.](#)

DISCLOSURE AND TRANSFER OF PERSONAL DATA

At Wallem we handle your personal data only according to the defined purposes of processing.

Personal data can be disclosed to the following third parties:

- Internal third parties – legal entities in the Wallem Group
- External third parties – legal entities outside the Wallem Group including but not limited to service providers acting as processors who provide operational support, providers of web analytics services, providers of marketing automation services, providers of outsourced IT and document storage providers; consultants and other service providers to enable the performance of services for us.

In some cases, the recipients of personal data may be located outside of EU/EEA, in which case we will ensure that sufficient level of data protection is maintained through appropriate safety measures, e.g. by using EU commission's standard contractual model clauses.

YOUR RIGHTS

Under certain circumstances, you have the following rights:

- the right to check what kind of personal data has been collected about you and how we use your information;
- the right to have your information rectified, erased or place restrictions on processing your data;
- the right to restrict the processing of your personal data or when the processing is based on our legitimate interests, to object the processing on grounds relating to your particular situation;

- the right to request your personal data to be provided in a structured, commonly used and machine-readable format and your personal data to be transferred to another data controller, when technically feasible;
- the right to withdraw your consent given to us for the processing of your personal data at any time;
- the right to object to the processing of your personal data at any time;
- the right to prevent your information from being used for direct marketing purposes. You can [opt out from receiving marketing materials](#) from us at any time;
- the right to lodge a complaint with a competent supervisory authority, if you consider that the processing of your personal data infringes any provisions of the GDPR. Wallem has nominated Die Hamburgische Datenschutzbeauftragte as our lead supervisory authority.

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20459 Hamburg, Germany

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Fax: 0049 40 / 428 54 – 4000

E-Mail: mailbox@datenschutz.hamburg.de

<https://datenschutz-hamburg.de>

We would however appreciate the chance to deal with your concern before you approach them, so please contact us in the first instance.

CONTACTING WALLEM

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