

Data privacy policy

This privacy policy statement informs you about the nature, scope and purpose of the processing of your personal data (hereinafter referred to as "data") on our website https://www.soniflex.com/ (hereinafter referred to as "website") and when you use our online store available via the website (jointly also referred to as our "online presence"). Personal data is all data that can be related to you personally, e. g. name, address, e-mail address(es), user behavior.

1. Responsible controller, data protection officer

Controller:

Cellofoam International GmbH & Co. KG Business unit soniflex Freiburger Strasse 44 88400 Biberach Germany

Phone: +49 73 51 - 34 02 861 E-mail address: sales@soniflex.de

Data protection officer:

You can reach our data protection officer via the following e-mail address: datenschutz@cellofoam.de.

2. Information on processing procedures, purposes and legal basis

2.1. Data collected when you visit our website

For the purely informational use of our online store website, i. e. if you do not register on the website or otherwise provide information to us, we only collect the data that your browser transmits to our server. This information is temporarily stored in a so-called log file (so-called server log files). The following information, which is technically necessary for us, is collected without your active intervention and stored until its automated deletion:

- name of the website you accessed resp. the file that you retrieved
- date and time of this access/retrieval
- description of the type of web browser used
- shortened IP address (the last 6 digits are deleted)

We process the aforementioned data for the following purposes:

- ensuring smooth connection to our website, as well as
- evaluating system security and stability of our website.

The legal basis for the data processing is Art.°6, para.°1, point (f) of the European General Data Protection Regulation (GDPR). Our legitimate interest follows from the aforementioned purposes as well as the technical necessities of processing the collected data to display our website contents to you. Under no circumstances shall we use the collected data for the purpose of drawing conclusions about your person.

The server log files are automatically deleted after 4 weeks.

In addition, we use cookies and analysis and marketing services when internet users visit our website. For more detailed explanations, please see sections 4 to 6 of this privacy policy statement.

2.2. Contact form

In the footer of the website as well as on the individual product pages you find a contact form for the purpose of correspondence with us, where you can enter the personal data specified there in the corresponding input fields, or we provide e-mail address links that can be used to contact us.

When using such a form/e-mail address link, an e-mail address and a message need to be entered so that we can answer the user's inquiry. Further information can be given at the user's discretion.

This data shall only be processed for this correspondence and for the specific purpose for which the data was provided to us in the context of this communication, for instance for the purpose of processing inquiries or



contacting you at your request. In this case, the processing of your personal data is carried out with your consent and is thus permissible pursuant to Art. 6, para. 1, point (a) GDPR. If you contact us with the aim of concluding a contract with us, the legal basis for data processing is Art. 6, para. 1, letter (b) GDPR.

The personal data that we have collected for the purpose of responding to inquiries will be automatically deleted after the inquiry has been dealt with, if the circumstances indicate that the matter has been fully resolved and if there are no legal obligations to retain the data.

2.3. Data collected when you create a user account

On our website, we offer you the option of registering as a user so you can use the features of our online store.

When you create a user account or log in to it, we use your access data (e-mail address and password) to grant you access to your account as well as to manage the user account. The legal basis for the corresponding data processing activity is Art. 6, para. 1, point (b) GDPR, as this information is required for the performance of the user contract concluded with you. The following data are mandatory information for your registration:

- form of address
- last name, first name
- e-mail address
- password
- postal address (street + number, ZIP code, city, country)

After submitting your registration via the corresponding registration form, you will receive an e-mail for registration confirmation and for verification that the registration on our website has actually been requested by you as the owner of the specified e-mail address. Only if you confirm the registration via the provided link, the registration shall be completed. Following successful registration, you can log in to the website with your access data and manage yourself the data stored in your user account.

You can request the deletion of your user account at any time by contacting the responsible person at the address given in section 1. After deletion of the user account, the data will be blocked for use, stored for the applicable retention periods under tax and commercial law, and then deleted after expiry of these periods, unless you have expressly consented to our further use of the data (e. g. in the context of e-mail marketing) or if the further use of the data is required to the extent permitted by law.

2.4. Data collection when you place an order

Within the scope of an order in our online shop, we store and use contact data such as last name, first name, address, e-mail address, telephone number and, if applicable, payment data.

These data are processed for the following purposes:

- to be able to identify you as our customer;
- to be able to process, fulfill and execute your orders;
- to communicate with you;
- for invoicing purposes;
- to handle any liability claims that may exist, as well as to assert any claims;
- to enable the technical administration of our website;
- for the purpose of customer data management.

Data processing is carried out pursuant to Art. 6, para. 1, subpara. 1, point (b) GDPR for the aforementioned purposes and is necessary for the appropriate processing of orders and for the mutual fulfillment of the obligations arising from the contractual relationship.

3. Transmission of data to third parties

Unless expressly stated below or in the preceding sections, your data will not be forwarded to third parties or other recipients.

We shall only pass on your personal data to third parties in the following cases:



- if you have given your express consent in accordance with Art. 6, para. 1, point (a) GDPR;
- if the disclosure is necessary according to Art. 6, para. 1, point (f) GDPR and there is no reason to assume that you have an overriding legitimate interest in the non-disclosure of your data;
- in the event that there is a legal obligation for the disclosure pursuant to Art. 6, para. 1, point (c) GDPR, and
- this is legally permissible and as per Art. 6, para. 1, point (b) GDPR necessary for handling contractual relationships with you, or
- if, in accordance with Art. 28 GDPR, we have concluded a data processing agreement with a service provider who supports us in the operation of our online portal and the associated processes.

3.1. For the purpose of contract fulfillment

We shall forward your personal data to any service partners involved in the fulfilment of the contract, for instance the logistics company commissioned with shipping the ordered goods. In any case, if we pass on your personal data to third parties in such cases, the range and scope of the data transmitted on these grounds shall be limited to the minimum required. The legal basis for this is Art. 6, para. 1, point (b) GDPR.

3.2. For the purpose of payment processing

If you use the payment service PayPal, we forward your name, delivery address, e-mail address and shopping cart details to PayPal (Europe) S.à r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg, so that PayPal can correctly attribute the order, and you as the user have an overview of all relevant order information when confirming the payment with PayPal.

The legal basis for the transfer of data for payment processing is Art. 6, para. 1, point (b) GDPR.

In case you do not wish your data to be forwarded, you are free to choose a different payment method at any time.

For more information on the data privacy policy of PayPal, please go to the following web address: https://www.paypal.com/en/webapps/mpp/ua/privacy-full?locale.x=en_EN

3.3. Group of Companies

If and when required for the contractual fulfillment of the order or for handling your inquiry or for internal administrative purposes, we will pass on your data to our group companies within the EU. For more information on data processing within the Cellofoam Group of Companies, please refer to the section on shared controllership at the end of this privacy policy statement.

3.4. Hosting and maintenance

For the deployment and technical operation of our online shop and the associated website ("hosting" of our online presence), we use the services of Profihost AG, Expo Plaza 1, 30539 Hannover, Germany. These hosting services serve to provide the required infrastructure and platform services, computing capacity, storage space and database functions as well as security services. Technical maintenance of the IT infrastructure is provided by STAR SYSTEMS GmbH, Otto-Lilienthal-Str. 5, 71034 Böblingen, Germany. The above-named service providers process the data transferred for these purposes solely on our behalf and in line with our instructions, and we have concluded a data processing contract with each of them in accordance with Art. 28 GDPR. Within the scope of the above-named services, no data is transferred to so-called third countries outside the EU and the EEA.

4. Cookies

In some areas of our online presence we use so-called cookies. Cookies are bits of information that are transferred from our web server or third-party web servers to your web browser and stored there for later reference. Cookies may be small files or other types of information storage media. In addition to cookies that are only used during a session and deleted after the website visit is terminated ("session cookies"), other types of cookies are used to store user settings and other information for a certain period of time (e. g. two years) ("permanent cookies").

However, as a rule, your internet browser includes options for changing its settings in a way that the browser will be informed about any cookies placed, so that it can allow or refuse them, or delete already existing cookies, depending on setting details.



For a large number of services, especially in the case of tracking, you can declare your general objection to the use of cookies transmitted for online marketing purposes via the US site http://www.aboutads.info/choices/ or the EU site http://www.youronlinechoices.com/. Furthermore, the storage of cookies can be prevented by means of their deactivation in your browser settings. We would like to point out that cookie deactivation may limit the functionality available in our online presence.

Cookies do not allow a server to retrieve private data from your computer, or any data stored there by another server. Cookies will not damage your computer nor do they contain viruses.

For our online presence we use technically necessary cookies. Technically necessary cookies help ensure the usability of a website by enabling basic functions such as page navigation and access to secure areas of the website. Without these cookies, the website will not function properly.

We use the following cookies that are technically necessary for the operation of the website and the functions of the online shop:

Name	Provider	Purpose	Storage period	Туре
CookieConsent	soniflex	Stores the status of the user's consent to cookie use for the current domain.	1 year	1 – Technically necessary
PHPSESSID	soniflex	Retains the user's status data for all page requests.	Session	1 – Technically necessary
SESS#	soniflex	Retains the user's status data for all page requests.	Session	1 – Technically necessary
t3D	soniflex	This cookie belongs to a bundle of cookies that serve the purpose of providing and presenting content. The cookies serve to maintain the correct states of features such as font, blog/image sliders, color schemes, and other site settings.	Persistent	1 – Technically necessary
tADe	soniflex	This cookie belongs to a bundle of cookies that serve the purpose of providing and presenting content. The cookies serve to maintain the correct states of features such as font, blog/image sliders, color schemes, and other site settings.	Persistent	1 – Technically necessary
tADu	soniflex	This cookie belongs to a bundle of cookies that serve the purpose of providing and presenting content. The cookies serve to maintain the correct states of features such as font, blog/image sliders, color schemes, and other site settings.	Persistent	1 – Technically necessary
tAE	soniflex	This cookie belongs to a bundle of cookies that serve the purpose of providing and presenting content. The cookies serve to maintain the correct states of features such as font, blog/image sliders, color schemes, and other site settings.	Persistent	1 – Technically necessary
tC	soniflex	This cookie belongs to a bundle of cookies that serve the purpose of providing and presenting content. The cookies serve to maintain the correct states of features such as font, blog/image sliders, color schemes, and other site settings.	Persistent	1 – Technically necessary
tMQ	soniflex	This cookie belongs to a bundle of cookies that serve the purpose of providing and presenting content. The cookies serve to maintain the correct states of features such as font, blog/image sliders, color schemes, and other site settings.	Persistent	1 – Technically necessary
tnsApp	soniflex	This cookie belongs to a bundle of cookies that serve the purpose of providing and presenting content. The cookies serve to maintain the correct states of features such as	Persistent	1 – Technically necessary



		font, blog/image sliders, color schemes, and other site settings.		
tPL	soniflex	This cookie belongs to a bundle of cookies that serve the purpose of providing and presenting content. The cookies serve to maintain the correct states of features such as font, blog/image sliders, color schemes, and other site settings.	Persistent	1 – Technically necessary
tTDe	soniflex	This cookie belongs to a bundle of cookies that serve the purpose of providing and presenting content. The cookies serve to maintain the correct states of features such as font, blog/image sliders, color schemes, and other site settings.	Persistent	1 – Technically necessary
tTDu	soniflex	This cookie belongs to a bundle of cookies that serve the purpose of providing and presenting content. The cookies serve to maintain the correct states of features such as font, blog/image sliders, color schemes, and other site settings.	Persistent	1 – Technically necessary
tTE	soniflex	This cookie belongs to a bundle of cookies that serve the purpose of providing and presenting content. The cookies serve to maintain the correct states of features such as font, blog/image sliders, color schemes, and other site settings.	Persistent	1 – Technically necessary
tTf	soniflex	This cookie belongs to a bundle of cookies that serve the purpose of providing and presenting content. The cookies serve to maintain the correct states of features such as font, blog/image sliders, color schemes, and other site settings.	Persistent	1 – Technically necessary
google-analytics- enabled	soniflex.com	Stores the consent to the use of Google Analytics Cookies.	1 month	1 - Necessary

The usage of those cookies that are absolutely required for the operation of our online presence, i. e. without which our website could not be displayed, takes place for said purposes in order to protect our legitimate interests and hence is covered by Art. 6, para. 1, subpara. 1, point (f) GDPR. The use of those cookies required for contract processing or for the contractually agreed use of our website takes place on the basis of Art. 6, para. 1, subpara. 1, point (b) GDPR. These cookies are automatically deleted after a period of time defined for each case.

Furthermore, we use cookies and other analysis tools to improve our offer and to present advertising content that is of interest to you and, in some cases, we work together with advertising partners who help us make our internet presence even more interesting to you. In this case, also cookies from partner companies are stored for this purpose on your hard disk when you visit our website (third-party cookies). The following paragraphs describe the use of such cookies and analysis tools and the cooperation with advertising partners individually and separately, including the scope of the information collected in each case and the applicable legal basis. The use of cookies that are not technically necessary in the above-described sense is based on your express consent pursuant to Art. 6, para. 1, point (a) GDPR. You can revoke your consent at any time with immediate effect. To do so, go to the Cookie Settings page accessible via our website's footer.

5. Use of additional cookies, own and third-party tools

We apply the following cookies and tools to understand how you use our offers and to enable us to present additional promotional offers that are of interest to you. The services described below are only employed if you have previously given your consent pursuant to Art. 6, para. 1, point (a) GDPR.

5.1. Google Analytics

If you have given your consent, we use "Google Analytics", a web analytics service provided by Google LLC ("Google"), for analysis, optimization and cost-effective operation of our online presence in accordance with Art. 6, para. 1, point (a) GDPR. Google uses cookies.



The Google Analytics service allows us to analyze the use of our website, to compile reports on the website activities of our users, and to obtain further statistical evaluations relating to website and internet usage.

Google and we share responsibility as joint controllers for the processing and use of the data pursuant to Art. 26 GDPR. We have agreed with Google that we will assume primary responsibility under GDPR provisions for the processing of the data and will comply with all obligations as per GDPR with respect to the processing of the data (including Art. 12 and 13 GDPR, Art. 15 to 22 GDPR, and Art. 32 to 34 GDPR).

Google will utilize the information to analyze the usage of our online presence by the users, to compile reports on user activities within this online presence, and to provide us with further services related to the usage of this online presence and to internet use. In this process, pseudonymized usage profiles of the users may be created on the basis of the processed data.

We use Google Analytics exclusively with enabled IP anonymization. This means that Google will truncate the user's IP address within the member states of the European Union resp. within other states that adhere to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transferred to a Google server in the United States of America and then truncated. The IP address communicated by the user's browser will not be merged and matched with other data collected by Google.

The information generated by the cookie about your use of the online presence will generally be transmitted to and stored on a Google server in the United States of America.

With regard to Google's U.S.-based processing of the data collected on your use of our website, please note: By accepting cookies that are not necessary for the website's functioning, you give your consent to your data being processed in the U.S.A., pursuant to Art. 49, para. 1. subpara. 1, point (a) GDPR The European Court of Justice has ruled that the data protection level in the U.S.A. does not meet EU standards. This is founded on the grounds that there is a risk that your data may be analyzed by U.S. authorities for control and monitoring purposes, possibly also without your having any judicial remedy. Google's standard contractual clauses submit to European data privacy regulations, thereby offering a guarantee, as far as contractually possible, to comply with European data privacy laws. If you only accept cookies necessary for website functioning, the data transfer described above will not take place.

Users have the option to prevent the storage of cookies by setting their browser software accordingly. By downloading and installing the browser plugin available under https://tools.google.com/dlpage/gaoptout?hl=en, users can also prevent the transfer to Google of the data that the cookie generates on their use of the online presence, as well as the processing of this data by Google.

For details of the terms of use and of data privacy, please go to www.google.com/analytics/terms/de.html or https://www.google.de/intl/en/policies/.

The deletion period for analytics data is set to 14 months.

These cookies are stored for a period of up to 2 years.

You are free to revoke your consent to the use of Google Analytics at any time. To do so, go to the Cookie Settings page accessible via our website's footer.

5.2. Google Ads Conversion Tracking

If you have given your consent, we use Google Ads Conversion Tracking (hereinafter referred to as "Google Ads"), a tracking and remarketing service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland (hereinafter referred to as "Google"), for the analysis, optimization and cost-effective operation of our online presence, pursuant to Art. 6, para. 1, point (a) GDPR.

Google Ads enables us a more targeted display of promotional content for and on our website so that we shall present users with only those advertisements that potentially match their interests. If users are, for instance, shown advertisements for products in which they have shown interest on other websites, this is called "remarketing". For these purposes, when a user accesses our website or other websites on which Google Ads is active, Google directly executes a code and integrates so-called (re)marketing tags (invisible graphics or code, also referred to as "web beacons") into the website. These tags make it possible to store an individual cookie, i. e. a small file, on the user's device (instead of cookies, comparable technologies may be used). The cookies may be set by a variety of domains, including google.com, doubleclick.net, invitemedia.com, admeld.com, googlesyndication.com or googleadservices.com. These files serve to record which websites the users have visited, which content they have shown interest in and which offers they have clicked on, as well as technical information



on the browser and operating system, any referring websites, the time of the visit and other information on the use of the respective online presence. The user's IP address is also recorded, yet in the context of Google Ads we draw your attention to the fact that the IP address will be truncated within the member states of the European Union resp. within other states that adhere to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transferred to a Google server in the United States of America and then truncated. The IP address is not merged with the data of the user generated by other Google services. The above-listed information may also be combined by Google with information of the same type from other sources. When subsequently visiting other websites, the user can be shown advertisements tailored to his/her interests.

Within the framework of Google Ads, the user data are processed in pseudonymized form. This means that Google does not store and process the user's name or e-mail address, for example, but processes the relevant data collected by the respective cookie as part of pseudonymized user profiles. From Google's perspective, the advertisements are not administrated and displayed for a specific, identifiable person, but for the holder of the cookie, regardless of who this cookie holder is. This does not apply if a user has explicitly permitted Google to process the collected data without prior pseudonymization.

The information collected about you in the scope of Google Ads is transmitted to Google and stored on Google's servers in the U.S.A.

With regard to Google's processing of the data collected on your use of our website, please note: By accepting cookies that are not necessary for the website's functioning, you give your consent to your data being processed in the U.S.A., pursuant Art. 49, para. 1, subpara. 1, point (a) GDPR The European Court of Justice has ruled that the data privacy level in the U.S.A. does not meet EU standards. This is founded on the grounds that there is a risk that your data may be analyzed by U.S. authorities for control and monitoring purposes, possibly also without your having any judicial remedy. Google's standard contractual clauses submit to European data privacy regulations, thereby offering, as far as contractually possible, a guarantee of compliance with European data privacy laws. If you only accept cookies necessary for website functioning, the data transfer described above will not take place.

Google and we share responsibility as joint controllers for the processing and use of the data pursuant to Art. 26 GDPR. We have agreed with Google that we will assume primary responsibility under GDPR provisions for the processing of the data and will comply with all obligations as per GDPR with respect to the processing of the data (including Art. 12 and 13 GDPR, Art. 15 to 22 GDPR, and Art. 32 to 34 GDPR).

For more information on Google's data processing activities for marketing purposes, please go to the overview page: https://policies.google.com/technologies/partner-sites?hl=en. Google's data privacy statement can be viewed at https://policies.google.com/privacy?hl=en.

These cookies are stored for a period of up to 2 years.

If you wish to object to the presentation of interest-based advertising by Google Ads, you can use the settings and opt-out options provided by Google at https://adssettings.google.com/authenticated.

You are free to revoke your consent to the use of Google Ads at any time. To do so, go to the Cookie Settings page accessible via our website's footer.

6. Integration of external content and functions

On our website, we integrate content, software or functions (hereinafter referred to collectively as "content") of other providers. This integration serves the purpose of making our online presence more interesting for you, or is necessary for legal reasons to allow us to present third-party content on our website at all. In all cases, the data processed includes your usage data and the metadata, and also the IP address, which must necessarily be forwarded to the provider for the integration of the content.

Inclusion of the Trusted Shops Trustbadge

To allow the display of our "Trusted Shops" seal of approval and any ratings collected, as well as our offering of Trusted Shops products to buyers after their placing an order, the Trusted Shops Trustbadge is integrated on our website.

The Trustbadge and the services it promotes are a service of Trusted Shops GmbH, Subbelrather Str. 15C, 50823 Cologne, Germany, and are integrated in our online presence in the form a so-called plug-in.

When the Trustbadge is clicked on to access the related content, the web server automatically saves a so-called server log file, which contains your IP address, date and time of access, transmitted data volume and the requesting provider (access data). The file serves to record the call-up and transfers it to the web servers of Trusted Shops GmbH to enable



the display of the Trustbadge content. This access data is not analyzed and will be automatically overwritten no later than seven days after the end of the visit to the website.

This action is based on our legitimate interest in the optimization and cost-effective operation of our online presence in accordance with Art. 6, para. 1, point (f) GDPR.

Any further personal data shall only be transferred to Trusted Shops if you have given your consent to this transfer by choosing to use Trusted Shops products after placing an order with us, or if you have already registered to use their services. In this case, the contractual agreement between you and Trusted Shops applies.

7. Storage period

Unless otherwise specified in this privacy policy, we will delete any stored data as soon as you revoke the related consent given, or when the data is no longer required for its intended purpose and such deletion is not contrary to any legitimate interests or legal obligations on our part to retain the data.

In any cases where the data is not deleted because it is required for other and legally permissible purposes, its processing will be restricted, i. e. the data is blocked and shall not be processed for any other purposes. This applies for instance to those user data that must be retained for reasons of commercial or taxation law.

The legal provisions require the storage of the respective data for 6 years as per § 257, clause 1 of the German Commercial Code (HGB), e.g. commercial letters, accounting records etc., and for 10 years as per § 147 clause 1 of the German Fiscal Code (AO), e.g. commercial and business letters or tax-relevant documents.

8. Your rights as data subject

As a data subject you have the following rights:

8.1. Right to information

You have the right to request confirmation from us as to whether we process personal data concerning you.

8.2. Right to rectification/erasure/restriction of processing

You also have the right to request us to carry out the following actions:

- rectify any inaccurate personal data that concern you, without undue delay (right to rectification),
- delete any personal data that concern you, without undue delay (right to erasure), and
- restrict the processing of any personal data that concern you (right to restriction of processing).

8.3. Right to data portability

You have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format, and to provide those data to another controller.

8.4. Right to revoke

You have the right to revoke your consent at any time. The revocation of consent does not affect the lawfulness of any data processing activities carried out on the basis of your consent up to the moment of revocation.

8.5. Right to object

If the processing of personal data concerning you is necessary to protect our legitimate interests (Art. 6, para. 1, point (f) GDPR), you have the right to object.

8.6. Right to lodge a complaint

If you consider that the processing of personal data relating to you infringes the GDPR, you have the right to lodge a complaint with a supervisory authority, specifically the State Commissioner for Data Protection and Freedom of Information of (Landesbeauftragter für den Datenschutz und die Informationsfreiheit) of Baden-Württemberg, without prejudice to other legal remedies.

To exercise your rights, please contact our data protection officer named in section 1 of this privacy policy. We will also gladly provide you with additional information on our privacy and data protection policy.



9. Modifications to our data privacy policy

We reserve the right to adapt this data privacy policy in the event of any changes to the legal situation, our online presence and/or the related data processing procedures. However, this only applies with regard to statements on data processing. If your consent is required or parts of the data privacy policy contain provisions covering the contractual relationship with you, modifications shall only be made with your consent.

You can regularly check this data privacy policy for any changes or modifications.

10. Data processing in the scope of our online presences on social media

We maintain various online presences on social media platforms, which we use to present our company and inform about our services and products, as well as for communicating with customers and other interested parties. On these social media, some of your personal data will be processed by the operator of the respective platform, who is solely responsible (sole controller) for the processing of this personal data.

You can find more information about data processing by the platform operator under the following links:

- Instagram (Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland) DataPolicy / Opt-Out: http://instagram.com/about/legal/privacy/.
- LinkedIn (LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland) Privacy Policy / Opt-Out: https://www.linkedin.com/legal/privacy-policy?trk=homepage-basic_footer-privacy-policy

We process personal information that you have disclosed to us via the respective online presence. For this kind of processing we are the sole controller. Such data may be your account name, contact details, or other communications.

If the objective of your request is the conclusion of a contract with us or its performance, the data is processed on the legal basis of Art. 6 (1), point (b) of the GDPR. Otherwise, we process the data on the basis of our legitimate interest in contacting persons that have inquired about our company, as per Art. 6, paragraph 1, point (f) of the GDPR.

a) Instagram Page Insights

Facebook Ireland Ltd. provides us with statistics and insights, in anonymized form, on our Instagram online presence, which we use to gain an understanding of the types of actions visitors take on our page. These online presence statistics are created on the basis of specific information about persons who have visited our page. The processing of this data serves our legitimate interest to evaluate the types of actions taken on our page and to improve our page based on the findings, as per Art. 6 (1), point (f) of the GDPR.

This processing of personal data is carried out by Facebook and us as joint controllers. Regarding this data processing as joint controllers, we have concluded an agreement with Facebook, which specifies the distribution of data protection obligations between us and Facebook. Details about the processing of personal data to create Page Insights as well as the agreement concluded between us and Facebook are available under the following link:

https://www.facebook.com/legal/terms/information about page insights data.

b. LinkedIn Page Insights

When you visit or engage with our online presence on LinkedIn, or are our follower, LinkedIn processes certain personal data to provide us with statistics and insights in an anonymized form. This provides us with insights on the types of actions that visitors take on our page (so-called Page Insights). For this purpose, LinkedIn processes in particular such data that you have already provided to LinkedIn in the form of information that you entered in your profile, such as data on your position, country, industry, seniority, company size, and employment status. In addition, LinkedIn will process information about how you interact with our LinkedIn online presence, e.g. whether you are a follower of our LinkedIn online presence. LinkedIn does not include any personal data about you when providing us with these Page Insights. We only have access to the aggregated Page Insights. Neither do we have a possibility to use the information in the Page Insights to draw conclusions about individual LinkedIn members. The processing of personal data in the scope of the Page Insights service is carried out by LinkedIn and us as joint controllers. This type of data processing serves our legitimate interests. The evaluation of the types of actions taken on our LinkedIn online presence is part of our public relations activities and serves to improve our online presence based on the resulting insights. The legal basis for this type of data processing is Art. 6 (1), point (f) of the GDPR. Regarding this data processing as joint controllers, we have concluded an agreement with LinkedIn, which specifies the distribution of data protection obligations between us and LinkedIn. You can access this agreement at: https://legal.linkedin.com/pages-joint-controller-addendum.

Version: March 2021



Information for data subjects on joint data controllership within the Cellofoam Group of Companies

The following information is intended to offer you transparency on the main contents of the agreement concluded between the companies belonging to the Cellofoam Group on joint data processing pursuant to Art. 26 GDPR.

1. Why joint data processing controllership?

The Cellofoam Group comprises the following legally independent companies:

- Cellofoam GmbH & Co. KG, Freiburger Str. 44, 88400 Biberach
- Cellofoam Germany GmbH & Co. KG, Freiburger Str. 44, 88400 Biberach
- Cellofoam International GmbH & Co. KG, Freiburger Str. 44, 88400 Biberach

(hereinafter jointly referred to as the "companies involved")

The joint conduct of business activities and the use of a shared IT infrastructure within the companies involved entails that the companies involved jointly determine the purposes and means of the processing of the customers' personal data. For this reason, they are to be regarded as joint controllers within the meaning of the first sentence of Art. 6, para. 1, subpara. 1 GDPR.

The joint controllership of the companies involved concerns all processing activities relating to customer data that are carried out in the context of the joint performance of company business.

3. What has been agreed by the companies involved?

The companies involved have specified the principles for the joint processing of personal data and the respective data protection tasks and responsibilities within the scope of group-wide data processing in a written agreement. In this agreement, they have defined in detail which responsibilities, accountabilities and competences apply in the different cases of joint data processing. The companies involved have agreed in particular which of them shall fulfill which obligations pursuant to the GDPR. This applies in particular to the handling of cases where data subjects are exercising their rights, and the fulfillment of our information obligations as per Art. 13 and 14 GDPR.

The conclusion of such an agreement is necessary because, for the above purposes, the companies involved process personal data in different process stages and in a shared IT system.

4. What does this mean for you as a data subject?

While they have joint controllership, the companies involved fulfill their data protection obligations in the scope of their respective responsibilities for the individual process steps as follows:

- Within the framework of joint controllership, the companies involved are responsible for processing the personal data collected.
- The companies involved shall independently make the information required under Art. 13 and 14 GDPR available to the data subjects, free of charge, in an accurate, transparent, comprehensible and easily accessible form and in a clear and simple language.
- The companies involved shall inform each other without delay about the rights (legal positions) exercised by data subjects. They shall provide each other with all data necessary to answer any requests for information.

Regardless of this allocation of responsibilities, which only governs the internal relationship between the companies involved, the companies involved are jointly answerable to you as the data subject regarding the lawfulness of their joint data processing.

You can claim your data privacy rights with any of the companies involved. As a rule, data subjects receive the requested information from the company involved with which they have exercised their rights were exercised.