

Privacy policy for customers, suppliers, other business partners of GROB-WERKE GmbH & Co. KG

This privacy policy informs you about the processing of your personal data, which we process with you in connection with a contractual relationship with GROB-WERKE GmbH & Co. KG and with third parties that enter into contact with us within the scope of their function (e.g., supervisory authorities, officials, experts, notaries, police, lawyers, courts, auditors, etc.). Your personal data will be processed in compliance with the applicable data protection regulations.

According to Article 4(1) of the General Data Protection Regulation (GDPR), personal data is any information relating to an identified or identifiable natural person.

I. Contact details of the controller

GROB-WERKE GmbH & Co. KG
Industriestraße 4
87719 Mindelheim

The contact details can be found in the [Legal Notice](#).

If you wish to assert your rights, report data privacy incidents, make any suggestions or complaints about how your personal data are processed or withdraw your consent, we recommend that you contact our Data Protection Officer.

II. Contact details of the Data Protection Officer

GROB-WERKE GmbH & Co. KG
Data Protection Officer
Industriestraße 4
87719 Mindelheim
Email: datenschutz@grob.de

III. Purposes of data processing and legal bases

Your personal data will be processed for the following purposes:

- a) **To fulfil, establish, implement, and terminate business relationships**, in particular the following tasks:
 - Processing of inquiries/orders, preparation of quotations, delivery of goods, Invoicing
 - Fulfillment of contracts as well as contract management
 - Supporting customers and business partners
 - Contact
 - Customer and supplier master data management
 - Procurement and associated purchase of goods
 - Additional purposes of data processing may arise from the respective contractual relationship.

The associated legal basis is Art. 6(1)(1)(b) GDPR.

- b) **Processing your data on the basis of legal obligations**

- Compliance with obligations arising from laws, regulations, or national and Community legislation, such as the fulfillment of statutory retention periods
- Accounting and the associated obligations
- Under European Anti-Terror Regulations 2580/2001 and 881/2002, we are obliged to compare your data against the "EU Terror Lists". This is to ensure that no funds or other economic resources are provided for terrorist purposes.

The associated legal basis is Art. 6(1)(1)(c) GDPR.

c) Processing your data on the basis of your consent

- Insofar as you have given us your consent to process personal data for specific purposes, e.g., receipt of the GROB newsletter, such processing becomes lawful on the basis of your consent.

The associated legal basis is Art. 6(1)(1)(a) GDPR.

d) Processing your data on the basis of legitimate interests

In addition to processing your data for the purpose of fulfilling the contract, we also process your data on the basis of our legitimate interests, unless they are outweighed by your legitimate interests. This includes the following purposes of processing:

- Operation of a supplier portal
- Assertion of legal claims and defense in case of legal disputes
- Prevention and detection of fraudulent activities
- Guaranteeing the security and operation of our IT systems as well as the ongoing development of these measures
- Measures for building and plant security
- Measures for safeguarding domiciliary rights
- Consultation and data exchange with credit agencies (e.g., Creditreform) to identify credit risks and for receivables management
- Conducting a credit check, e.g., Schufa
- Advertising measures, such as sending newsletters or customer satisfaction surveys within the legal framework of Section 7(3) of the German Unfair Competition Act (UWG).
- For the storage and use of your contact data for further mutual exchange, if you have provided us with a business card

The associated legal basis is Art. 6(1)(f) GDPR.

IV. Data categories

We process the following categories of your personal data:

- Personal master data (e.g., last name, first name, date of birth, address data, associated company)
- Contact details (e.g., telephone, e-mail)
- Documentation data, e.g., extract from the commercial register, credit check, etc.
- Registration data in the supplier portal
- Contract and billing data (e.g., bank account, invoice data, etc.)
- Authentication data (e.g., identity documents)
- Depending on the contents of our business relationship or that of third parties, other categories of data are processed, such as client data, criminal proceedings, police investigations, etc.

V. Data deletion and retention period

We only store your personal data for as long as is necessary to achieve the purpose of processing, unless we are obliged to comply with statutory retention obligations. In this case, your data will be deleted after these statutory retention periods have expired.

VI. Access to your data

Within our company, only those departments that need your data to fulfill our contractual and legal obligations will have access to it.

VII. Disclosure of data to third parties

Your personal data is disclosed or transferred to third parties especially in special cases:

- Transmissions to third parties engaged by us to fulfil the terms of contractual and delivery relationships, such as to banks/payment service providers which process payments as well as transport companies/shipping companies which handle shipments.
- In the case of requests from authorities or courts, only if and to the extent that we are legally obliged to do so.
- Within the GROB Group, insofar as this is necessary for the contractual relationship.
- If you have given us your consent to transfer your data to third parties.

VIII. Data transfer to third countries

Data will not be transferred to third countries unless the transfer of data within the GROB Group is unavoidable in order to fulfill administrative purposes for the execution of the contractual relationship. Standard EU contractual clauses have been concluded with the non-European plants and branches within the GROB Group. In addition, we take appropriate technical and organizational measures in accordance with the current state of the art to ensure that your personal data is processed in accordance with the European level of data protection.

IX. Order processor

We use the camos tool for preparing quotations in the 5-axis universal machining center segment. The address is as follows: camos software und Beratung GmbH, Friedrichstraße 14, 70174 Stuttgart.

We use SAP + the SAP CRM customer management system for further quotation and invoicing activities. The address is as follows: SAP Deutschland SE & Co. KG, Hasso-Plattner-Ring 7, 69190 Walldorf, Baden.

We use the Luminance tool for contract management. The address is as follows: Luminance Technologies Ltd, 6 Duke Street St James's, London, SW1Y 6BN.

We use DocuSign as an electronic signature solution for signing documents. The address is as follows: DocuSign International, 5 Hanover Quay Grand Canal Dock Dublin, D02 VY79 Ireland.

The snapADDY system is used as a system to record your contact details after you have provided business cards and to prepare a visit report. The address is as follows: snapADDY GmbH, Haugerkirchgasse 7, 97070 Würzburg.

We use the Jaggaer cloud solution as the supplier portal. The address is as follows: Jaggaer, Wienerbergstraße 3/5, 1100 Vienna, Austria.

We have concluded corresponding data processing agreements as defined in Art. 28 GDPR with our external data processors.

X. Cookies and similar technologies

Information on the cookies we use and the associated data processing can be found at: [Privacy Policy GROB-WERKE - GROB-WERKE](#)

XI. Rights of the affected person

If your personal data are processed, you are a data subject for the purposes of the GDPR and you have the following rights in relation to the controller:

- **Right to information**
You have the right to obtain from the controller confirmation as to whether or not personal data concerning you are being processed,

and, where that is the case, access to the following information:

- (1) the purposes for which the personal data are processed;
- (2) the categories of personal data that are processed;
- (3) the recipients or categories of recipient to whom the personal data concerning you have been or will be disclosed;
- (4) the envisaged period for which the personal data concerning you will be stored, or, if no specific information is possible, the criteria used to determine that period;
- (5) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning you or to object to such processing;
- (6) the right to lodge a complaint with a supervisory authority;
- (7) where the personal data are not collected from the data subject, any available information as to their source;
- (8) the existence of automated decision-making, including profiling, referred to in Art. 22(1) and (4) GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

You have the right to be informed of whether personal data concerning you are transmitted to a third country or an international organization. In this respect, you may request to be informed of the appropriate guarantees as defined in Art. 46 GDPR in connection with the transfer.

➤ **Right to correction**

You have a right to rectification and/or completion in relation to the controller if the processed personal data concerning you are incorrect or incomplete. The controller must immediately rectify the data.

➤ **Right to restriction of processing**

You have a right to restrict the processing of personal data concerning you under the following conditions:

- (1) if you contest the accuracy of the personal data, for a period enabling the controller to verify the accuracy of the personal data;
- (2) the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- (3) the controller no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise, or defense of legal claims; or
- (4) you have objected to processing pursuant to Article 21(1) GDPR pending the verification whether the legitimate grounds of the controller override yours.

Where processing of the personal data concerning you has been restricted, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

If processing has been restricted under the above conditions, you will be informed of the controller before the restriction is lifted.

➤ **Right to deletion**

a. Erasure obligation

You have the right to obtain from the controller the erasure of personal data concerning you without undue delay and the controller is obliged to erase these data without undue delay where one of the following grounds applies:

- (1) The personal data concerning you are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- (2) You withdraw your consent on which the processing is based according to Art. 6(1)(a) or Art. 9(2)(a) GDPR and there is no other legal ground for the processing.
- (3) You object to the processing pursuant to Art. 21(1) GDPR and there are no overriding legitimate grounds for the processing, or you object to the processing pursuant to Article 21(2) GDPR.
- (4) The personal data concerning you have been unlawfully processed.
- (5) The personal data concerning you have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.
- (6) The personal data concerning you have been collected in relation to the offer of information society services referred to in Article 8(1) GDPR.

b. Information to third parties

Where the controller has made public the personal data concerning you and is obliged pursuant to Art. 17(1) GDPR to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that you as the data subject have requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

c. Exceptions

The right to erasure does not apply to the extent that processing is necessary

- (1) for exercising the right of freedom of expression and information;
- (2) for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- (3) for reasons of public interest in the area of public health in accordance with Art. 9(2)(h) and (i) as well as Art. 9(3) GDPR;
- (4) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Art. 89(1) GDPR in so far as the right referred to in paragraph a) is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- (5) for the establishment, exercise or defense of legal claims.

➤ **Right to notification**

If you have asserted the right to rectification, erasure, or restriction of the processing in relation to the controller, the controller shall communicate this rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort.

You have the right to be informed about these recipients by the controller.

➤ **Right to data portability**

You have the right to receive the personal data concerning you, which you have provided to a controller, in a structured, commonly used and machine-readable format. and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:

- (1) the processing is based on consent pursuant to Art. 6(1)(a) GDPR or Art. 9(2)(a) GDPR or on a contract pursuant to Art. 6(1)(b) GDPR and

(2) the processing is carried out by automated means.

In exercising this right to data portability, you also have the right to have the personal data concerning you transmitted directly from one controller to another, where technically feasible. This right shall not adversely affect the rights and freedoms of others.

The right to data portability does not apply to processing personal data that is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

➤ **Right to object**

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on Art. 6(1)(e) or (f) GDPR, including profiling based on those provisions.

The controller shall no longer process the personal data concerning you unless the controller demonstrates compelling legitimate grounds for the processing which override your interests, rights, and freedoms or for the establishment, exercise, or defense of legal claims.

Where personal data concerning you are processed for direct marketing purposes, you have the right to object at any time to processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing.

If you object to processing for direct marketing purposes, the personal data concerning you shall no longer be processed for such purposes.

In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, you may exercise your right to object by automated means using technical specifications.

➤ **Right to withdraw the declaration of consent under data protection law**

You have the right to withdraw your data privacy declaration of consent at any time. A revocation of consent does not affect the lawfulness of the processing carried out based on the consent up until the time of revocation.

Recipient of an objection

An objection can be submitted informally with the subject "Objection", indicating your name and address, and can be addressed to:

GROB-WERKE GmbH & Co. KG
Industriestraße 4
87719 Mindelheim
Email: info@de.grobgroup.com

➤ **Right to lodge a complaint with a supervisory authority**

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work, or place of the alleged infringement if you consider that the processing of personal data concerning you infringes the GDPR.



Our data protection supervisory authority is the Bavarian Regional Office for Data Protection Supervision, PO Box 1349, 91504 Ansbach.

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