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# DGSVO Privacy Policy

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Changes: Compliance with legal requirements

# **Privacy Policy**

#### 1 Introduction

Data protection is a matter of trust, and your trust is important to us. We respect your privacy and personal sphere. The protection, lawful collection, processing, and use of your personal data is an important concern for us.

The data available at PPC Paper Print Converting GmbH is of great value to the company and for smooth operations. These data must therefore be protected from unauthorized access and other risks. We strictly observe legal regulations when processing your personal data and would like to inform you below about the most important aspects of our data processing.

#### 1.1 Contact for Data Protection

For questions regarding the collection, processing, or use of your personal data, or for information, correction, blocking, or deletion of data as well as revocation of consent, please contact:

PPC Paper Print Converting GmbH Ponauer Str. 9a 9800 Spittal an der Drau Tel: +43 (0) 4762 / 4191-0

E-Mail: office@ppc.co.at

### 2 Purpose

This privacy policy aims to establish uniform standards for data protection within the company and provide central guidelines for complying with data protection regulations and maintaining data protection organization according to the General Data Protection Regulation (GDPR) (EU) 2016/679, as amended.

By complying with the standards defined in this policy, the company fulfills its data protection obligations and ensures that the interests and rights of the affected persons are adequately taken into account.

### 3 Scope

This privacy policy applies to any processing of personal data within PPC Paper Print Converting GmbH. It includes the initial collection of data, its storage and use, internal sharing within the Papstar group, and transmission to third parties. All data protection aspects that may arise during data processing are comprehensively regulated. It applies to all types of personal data, especially of customers, employees, suppliers, business partners, and interested parties.

The origin of the data is not relevant for the applicability of this policy; the decisive factor is the use of the data within the company.

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on: 04.04.2025

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on: 08.04.2025

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#### 4 Definitions

#### 4.1 Personal Data

Personal data refers to information relating to an identified or identifiable natural person. Information solely concerning legal entities is not considered personal data, although such data should be equally protected. Data is no longer personal when it is fully anonymized, but not if only pseudonymized.

### 4.2 Data Subjects

These are individuals whose personal data is processed by the company.

### 4.3 Third Parties

Third parties are any entities outside the company. Internal departments are not considered third parties, but internal sharing of data must also be justified. Service providers with data processing agreements are not considered third parties, as they operate under the company's responsibility.

### 5 Special Forms of Data Processing

#### 5.1 Collection, Processing, and Use of Personal Data on the Website

Our website **www.ppc.co.at** can be visited without providing personal information. We only collect access data without personal references, such as the page from which you visited us or the name of the requested file. These data are used solely to improve our offerings and do not allow conclusions about your identity.

#### 5.2 Processing of Special Categories of Data

Sensitive data and data concerning particularly vulnerable individuals may only be processed under additional conditions or special safeguards.

This includes data on racial/ethnic origin, political opinions, religious/philosophical beliefs, union membership, genetic and biometric data, health, sex life, or sexual orientation. These require special justification and implementation of appropriate security measures.

Financial or credit information about employees/customers is treated similarly, despite being general personal data. Data on criminal convictions and offenses also require prior review and approval by the Data Protection Officer.

Additionally, minors are particularly protected. Measures targeting minors must not be implemented without prior review and approval by the Data Protection Officer.



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## 6 Rights of Data Subjects

Data subjects have the right to:

- Information about processed personal data
- Rectification, deletion, or restriction of processing
- · Object to data processing
- Data portability

They may also file complaints with the Data Protection Authority (<u>www.dsb.gv.at</u>) if they believe their data is being processed unlawfully.

### 6.1 Right to Access and Data Portability

Upon request, data subjects must be informed whether PPC processes their data. If so, they are entitled to details of such data, its purpose, source (if known), recipients, storage duration, automated decision-making (if any), and rights.

Data subjects can also receive their data in a structured format for transfer to another controller—limited to data processed based on consent, a contract, or automated processing.

Identity verification is required for these requests, and no third-party data must be disclosed. The Data Protection Officer must be informed of all such requests.

If a request cannot be fulfilled immediately, a preliminary response must be sent with an estimated timeline.

#### 6.2 Deletion and Restriction of Processing

Data must be deleted upon justified request if there is no basis for processing or it has ceased. If deletion is not possible, processing must be restricted, especially pending review or when future use is not desired.

#### 6.3 Right of Rectification

Incorrect or incomplete personal data must be corrected upon request. This is also in the company's interest to maintain data quality. Employees should report known errors to the relevant department for correction.

# 6.4 Right to Withdraw Consent, Object and Complain

Consent to data processing can be revoked at any time with future effect. Data subjects must be informed of this right.

If processing is based on legal grounds rather than consent, and the person objects, the company must assess whether processing can be stopped.

Complaints must be forwarded to the Data Protection Officer immediately. The Officer will respond and suggest appropriate improvements if necessary.



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### 7 Website www.ppc.co.at relevant Information

#### 7.1 Use of Cookies

We use cookies to make our website more attractive and enable certain functions. Cookies are small text files stored on your device.

Cookies may serve functionalities, analytics, or user experience. They are either session cookies (deleted after browser session) or persistent cookies (remain beyond the session).

You will be informed about cookie use on your first visit and can adjust your settings.

For more on cookies, refer to the Data Protection Authority's website.

### 7.2 Google Analytics

Our website uses Google Analytics, a web analytics service from Google Inc. ("Google"). Cookies collect information on website use, which is usually transmitted to and stored on Google servers in the U.S.

With IP anonymization active, your IP address is shortened within the EU/EEA before being sent. Only in rare cases is the full IP sent to the U.S. Google processes data on behalf of the site operator and does not merge your IP with other data.

You can disable cookies in your browser settings, but this may limit site functionality. You can also prevent data collection by using browser plugins.

#### 7.3 Data Security

Your personal data is encrypted via SSL when transmitted online.

We use technical and organizational measures to protect against data loss, destruction, unauthorized access, changes, or dissemination. Account access is password-protected—please log out and close your browser when done, especially on shared devices.

### 8 Image and Video Recordings

Photos and videos may be taken for production or event documentation purposes. You will be informed separately if applicable.

This serves public relations and documentation, based on legitimate interest under Art. 6(1)(f) GDPR. We ensure no excessive intrusion into rights occurs and avoid violating legitimate interests.

You can request deletion during events by asking the photographer immediately.

#### 8.1 Video Conferences

PPC uses **Microsoft Teams** for internal and external communication.



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To do so, personal data (e.g., name, email, title, connection data, participation status, chat/audio/video contents, and shared documents) is processed under Art. 6(1)(b) GDPR for (pre)contractual communication.

Audio/video recordings are only stored with explicit consent.

### 9 Final Provisions

#### 9.1 Publication

This privacy policy is made available to all interested parties of Paper Print Converting GmbH in an appropriate manner.

#### 9.2 Amendments

PPC reserves the right to amend this privacy policy as needed—especially to comply with legal changes, binding regulations, authority requirements, or internal processes.