

Vetrotech Saint-Gobain Deutschland GmbH
Privacy Policy
Last updated: January 2023

DATA POLICY

The provisions of the EU General Data Protection Regulation (hereinafter referred to as the “GDPR”) have been valid throughout Europe since May 25, 2018. With this document, we would like to inform you about how **Vetrotech Saint-Gobain Deutschland GmbH** processes personal data in accordance with this new regulation (see Art. 13 GDPR). Please read our Privacy Policy carefully. Should you have any questions or comments about our Privacy Policy, you may contact our data protection officer as indicated in Section 2.

Table of Contents

1. Overview
2. Name and contact information for the data controller and the corporate data protection officer
3. Purposes of data processing, legal bases and legitimate interests pursued by Saint-Gobain XY GmbH or a third party and categories of recipients
 - 3.1. Accessing our website or application
 - 3.2. Conclusion, performance or termination of a contract
 - 3.3. Data processing for advertising purposes
 - 3.4. Website and website optimization
4. Transmission to recipients outside the EU
5. Your rights
6. Data security

1. Overview

The following data protection notice informs you about the type and scope of **personal data** processed by **Vetrotech Saint-Gobain Deutschland GmbH**. Personal data is information that can be used to personally identify you whether directly or indirectly.

Data processing performed by **Vetrotech Saint-Gobain Deutschland GmbH** may **essentially be divided into two categories**:

- All data required for the **performance of a contract** with **Vetrotech Saint-Gobain Deutschland GmbH** will be processed for the purpose of performing the contract. If external service providers are also involved in performing a contract, e.g. logistics companies or subcontractors, your data will be passed on to them to the extent necessary in each particular case.
- A variety of information is exchanged between your terminal device and our server **when you access the website/application** operated by **Vetrotech Saint-Gobain Deutschland GmbH**. This may also involve personal data. The information collected in this way is used, among other things, to optimize our website or to display **advertising** in your terminal device’s web browser.

In accordance with the provisions GDPR, you have **a variety of rights** that you may exercise in your dealings with us. These include, among others, the right to **object** to specific forms of data processing, in particular data processing for advertising purposes.

Should you have any questions regarding this data protection notice, please feel free to contact our corporate data protection officer at any time. You will find the relevant contact information below.

DATA POLICY

2. Name and contact information for the data controller and the corporate data protection officer

This privacy policy applies to data processing by **Vetrotech Saint-Gobain Deutschland GmbH, Jens-Otto-Krag-Straße 6, 52146 Würselen, Deutschland** ("data controller"), and to the following websites and applications: <https://www.vetrotech.com>. The **Vetrotech Saint-Gobain Deutschland GmbH** corporate data protection officer can be contacted at the address listed above.

3. Purposes of data processing, legal bases and legitimate interests pursued by Vetrotech Saint-Gobain Deutschland GmbH or a third party and categories of recipients

3.1. Accessing our website or application

When you access our website/application, the browser used on your terminal device automatically sends information to the server for our website/application and temporarily saves it in a so-called log file. We have no control over this. **The following information** will be collected without action on your part and stored until automatic deletion:

- The IP address of the requesting Internet-capable device,
- The date and time of access,
- The name and URL of the retrieved file,
- The website/application from which the website was accessed (referrer URL),
- The browser you are using and, if applicable, the operating system of your Internet-capable computer as well as the name of the access provider.

The legal basis for **processing the IP address** is Article 6 (1 lit. f) GDPR. Our legitimate interest is based on the purposes of data collection described below. The data collected does not enable us to identify you nor do we attempt to do so.

We use the IP address of your terminal device and other data listed above for the **following purposes**:

- Ensuring a trouble-free connection,
- Ensuring convenient use of our website/application,
- Evaluating system security and stability.

The data is saved for a **period of 14 months** and then automatically deleted. We also use "cookies", tracking tools and social media plugins for our website/application. The exact procedures involved, and how your data will be used for the respective purposes, are explained in more detail in Section 3.4 below.

If you have consented to **geo-localization** in your browser or operating system or other settings on your terminal device, we will use this function to offer you individual services related to your current location (e.g. the location of the nearest branch). We process your location data collected in this way exclusively

DATA POLICY

for this function. This data is deleted upon the conclusion of your use of this function.

3.2. Conclusion, performance or termination of a contract

3.2.1. Data processing upon the conclusion of a contract

The object of **Vetrotech Saint-Gobain Deutschland GmbH** is the **manufacture and distribution of innovative and reliable fire-resistant and high-security glazing solutions**. In this context, we process the data required for the **conclusion, performance or termination of a contract** with you. This includes:

- Company, first name, last name
- Invoicing and shipping address
- E-mail address, if applicable
- Invoice and payment information
- Date of birth, if applicable
- Telephone number, if applicable

The legal basis for this is Art. 6 (1 lit. b) GDPR, i.e. you provide us data on the basis of the contractual relationship between you and us. Provided we do not use your contact information for advertising purposes (see Section 3.3.), we will store the data collected for the performance of the contract until the expiration of any applicable statutory or contractual warranty and guarantee rights. Upon expiration of this period, we retain information concerning the contractual relationship required by commercial and tax law for the applicable periods specified by law. During this period (regularly ten years from the conclusion of the contract), the data will be subject to reprocessing solely in the event of an audit by the tax authorities.

3.2.2. Identity, credit rating and transmission to credit agencies

Where necessary, we verify your **identity** using information from service providers. The legal basis for this is Art. 6 (1 lit. b and f) GDPR. The right to do so results from the protection of your identity and the avoidance of fraud attempts at our expense. The circumstances and the result of our inquiry will be added to your customer account for the duration of the contractual relationship.

If you have already purchased items from us, your data stored by us about you can be supplemented by so-called score values. **Scoring** is the creation of a forecast of future events based on collected information and past experience. An assignment is made to statistical groups of persons who had similar entries in the past on the basis of personal data stored about you. The underlying method used is a well-founded mathematical-statistical method for predicting risk probabilities that has long been tried and tested in practice.

In the **event of a delay in payment**, we will transmit the relevant data to a company commissioned to collect the claim if other applicable legal requirements are met. The legal bases for this are both Article 6 (1 lit. b) and Article 6 (1 lit. f) GDPR. The assertion of a contractual claim is deemed to be a legitimate interest within the meaning of the second provision referred to above. Information about the delay in payment or a possible loss of receivables will also be forwarded to credit agencies cooperating with us if

DATA POLICY

other applicable legal requirements are met. The legal basis for this is Art. 6 (1 lit. f) GDPR. The legitimate interest required here arises from our interest and that of third parties in reducing contractual risks for future contracts.

3.3. Data processing for advertising purposes

The following information relates to the processing of personal data for advertising purposes. The GDPR considers this form of data processing to be permitted in principle on the basis of Art. 6 (1 lit. f) GDPR and to be a legitimate interest. The retention period for data used for advertising purposes is not based on rigid principles and is rather determined on the basis of whether continued retention is necessary for purposes of advertising-related contact. Please see Section 3.3.3. for the process applicable should you object.

3.3.1. Advertising purposes of and of third parties

If you have concluded a contract with us, we will list you as an existing customer. In this case, we process your **postal contact data** without any specific consent in order to send you information about new products and services. We process your **e-mail address** without any specific consent to send you information about our own similar products.

3.3.2. Interest-based advertising

In order to ensure that you only receive advertising information that is of supposed interest to you, we categorize and **supplement your customer profile** with the following information. Statistical information as well as information about you (e.g. basic data of your customer profile) is used for this purpose. The aim is to provide you solely with advertising that corresponds to your actual or perceived needs and, accordingly, not to bother you with useless advertising.

3.3.3. Right to object

You can object to data processing for the above-mentioned purposes at any time free of charge, specifically for the respective communication channel and with effect for the future. All you need to do is send an e-mail or a letter by regular mail using the contact information provided in Section 2.

If you submit an objection, the relevant contact address will be blocked for further data processing for advertising purposes. We would like to point out that in exceptional cases advertising material may still be sent for a short period even after receipt of your objection. This is due to the technically required lead time for advertisements and does not mean that we have not implemented your objection. We apologize for the inconvenience.

3.3.4. Sending newsletters

On our website we offer you the possibility to register for our **newsletter**. To ensure that no mistakes are made when entering the email address, we use the so-called double opt-in procedure: After you have entered your email address in the registration field, we will send you a confirmation link. Only once you have clicked on this confirmation link will your email address be added to our distribution list. You can **revoke** your consent at any time with effect for the future by sending a short note by email to the email

DATA POLICY

address given in section 2. In addition to this, there is a link that you can click on to revoke your consent in the email containing each newsletter.

3.4. Online presence and website optimisation

3.4.1. Cookies – general information

When you visit a website, it may retrieve or store information about your browser, usually in the form of cookies. This information might be about you, your settings or your device and is mostly used to make the site work as you expect it to. The information does not usually directly identify you, but it can give you a more personalised web experience. Because we respect your right to privacy, you can choose not to allow certain types of cookies. Click the different category headings to find out more and to change some of our default settings. Please note that blocking some types of cookies may impact your experience on our websites and the services we are able to offer.

The cookie consent manager, which opens when you access the site, allows you to select which categories of cookies to agree or reject. Essential cookies cannot be rejected as they are necessary to provide you with services (see point 3.4.1.1).

3.4.1.1. Essential cookies

These cookies are necessary for the website to function and cannot be switched off. Typically, these cookies are only set in response to actions you take in terms of service requests, such as setting your privacy preferences, logging in, or completing forms. You can set your browser to block these cookies or to notify you about these cookies, but some areas of the website may not function properly. These cookies do not save any personal data. The legal basis for these cookies is Art. 6 (1) b GDPR or, for third countries, Art. 49 (1) b GDPR.

3.4.1.2. Performance cookies

These cookies enable us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies, we will not know when you visited our site. The legal basis for these cookies is Art. 6 (1) a GDPR or, for third countries, Art. 49 (1) b GDPR.

3.4.1.3. Functional cookies

These cookies enable the website to provide enhanced functionality and personalisation. They may be set by us or by third-party providers whose services we use on our pages. If you do not allow these cookies, some or all of these services may not function properly. The legal basis for these cookies is Art. 6 (1) a GDPR or, for third countries, Art. 49 (1) b GDPR.

3.4.1.4. Marketing cookies

These cookies can be set by our advertising partners via our website. They can also be used by these companies to create a profile of your interests in order to show relevant advertisements on other

DATA POLICY

websites. They do not directly store personal data but are based on the unique identification of your browser and your Internet device. If you do not allow these cookies, your advertising will be less targeted. The legal basis for these cookies is Art. 6 (1) a GDPR or, for third countries, Art. 49 (1) b GDPR.

3.4.2 Mouseflow

This website uses Mouseflow, a web analytics tool from Mouseflow ApS, Flaesketorvet 68, 1711 Copenhagen, Denmark, to record randomly selected individual visits (only with an anonymised IP address). This creates a log of mouse movements and clicks for the sole purpose of randomly replaying individual website visits and deriving potential improvements for the website. As a result of anonymization, the information cannot be traced back to a person and will not be shared with third parties. If you do not want Mouseflow to collect your data, you can disable this on the aforementioned website used by Mouseflow by clicking on the following link: www.mouseflow.com/opt-out/

3.4.3 Piwik advertising analysis service

This website uses the Piwik advertising analysis service. This service uses cookies that allow us to analyze the use of the website. The usage information generated by the cookie (including your shortened IP address) is transmitted to our server and stored for usage analysis for the purpose of optimizing our website. Your IP address is immediately anonymized during this process. As a result, you as a user remain anonymous to us. The information generated by the cookie about the use of the website will not be disclosed to third parties.

3.4.4. Google Analytics

For the purpose of demand-oriented design and continuous optimization of our pages, we use Google Analytics, a web analytics service provided by Google Inc. ("Google"). For this purpose, **pseudonymised user profiles** are created and cookies are used. The information generated by cookies about your use of the website, such as:

- Browser type/version,
- Operating system used,
- Referrer URL (the previously-visited page),
- The hostname of the accessing computer (IP address),
- Time of query on our server,

shall be transferred to and saved on a Google server in the United States. This will be used for evaluating your use of the website, compiling reports on website activities, and providing other services relating to website and internet usage for market research purposes and for developing this website as needed. This information may also be transferred to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not, under any circumstances, associate the anonymised IP address transmitted by your browser when using Google Analytics with any other data held by Google. IP addresses will be anonymised so that **attribution is not possible** (IP masking).

You may **refuse** the installation of cookies by selecting the appropriate settings for your browser.

DATA POLICY

However, please note that if you do this you may not be able to use the full functionality of this website. You can also block the collection of the data generated by the cookie and relating to your usage of our website (including your IP address) and the processing of such data by Google by downloading <https://tools.google.com/dlpage/gaoptout?hl=en> and installing a web browser add-on. As an alternative to the web browser add-on, in particular for web browsers installed on mobile end devices, you can also block tracking by Google Analytics. This will install an opt-out cookie, which will prevent your data from being collected the next time you visit this website. The opt-out cookie will only work on this browser and for our website and will be stored on your device. If you delete cookies from this browser, you will have to reinstall the opt-out cookie. For further information on data protection with respect to Google Analytics, please refer to <https://support.google.com/analytics/answer/6004245?hl=en>.

3.4.5 Social media plugins

On our website, we use social plugins from the social networks Facebook, Google+, Twitter, Instagram, LinkedIn and Xing [add more if necessary] in order to make our company better known via these sites. The underlying advertising purpose is to be regarded as a legitimate interest within the meaning of the GDPR. The responsibility for data-protection compliant operation is to be ensured by their respective providers. The integration of these plugins by us takes place by way of the so-called two-click method in order to protect visitors to our website as well as possible: by default, we embed deactivated buttons in our website that do not establish contact with the servers of the social networks. The buttons only become active and establish a connection once you activate them, thus granting your consent to communications with Facebook, Google or Twitter etc. You can then transmit your recommendation with a second click. If you are already logged in to the social network of your choice and transmit your recommendation via one of these networks, then this happens without opening another window. On Twitter, a pop-up window appears in which you can continue to edit the text of the Tweet.

3.4.6 Facebook

Our website uses so-called social plugins from Facebook Inc., USA. The plugins are marked with a Facebook logo or have "Like" and/or "Share" buttons. A list of Facebook plugins, showing what they look like, can be found by clicking the following link <http://developers.facebook.com/plugins>. When such a plugin is activated (by the first click), your browser will establish a direct connection to Facebook's servers. The content of the plugin will be sent directly to the browser by Facebook and integrated into the page. By means of this integration, Facebook will learn that the browser has accessed the corresponding page on our website, even if you do not have a Facebook profile or are not currently logged in to Facebook. This information (including your IP address) is transmitted directly to a Facebook server in the USA by your browser and stored there. If you are logged in to Facebook, Facebook can directly link your visit to our website to your Facebook profile. If you interact with plugins, for example by pressing the "Like" button, this information is also sent directly to a Facebook server and stored there. The information is also published on your Facebook profile and displayed to your Facebook friends.

For information about the scope and purpose of this data collection, processing and use by Facebook and related rights and setting options to protect privacy, please see Facebook's privacy Policy <http://www.facebook.com/policy.ph>. If you do not want Facebook to link the information collected about your

DATA POLICY

visit to our website directly to your Facebook profile, you must log out of Facebook before visiting our website. You can also completely prevent the loading of Facebook plugins with add-ons for your browser, e.g. with the Facebook Blocker <http://webgraph.com/resources/facebookblocker/>.

3.4.8 Twitter

Our website also uses plugins from the short message network Twitter Inc., USA. Twitter plugins ("Twitter" button) can be recognised by the Twitter logo (a white bird on a blue background) followed by the word "Twitter". When you access a page on our website that contains a Twitter plugin, a direct connection is established between your browser and the Twitter server. This informs Twitter that you have visited our site and sends your IP address to Twitter. If you click the Twitter button while you are logged into your Twitter account, you can link the content of our pages to your Twitter profile, thus allowing Twitter to associate the visit to our pages with your user account. Please note that we, as the provider of the pages, have no knowledge of the content of the transmitted data or its use by Twitter. You can find more information, see the Twitter Privacy Policy here <http://twitter.com/privacy>. If you do not want Twitter to be able to associate your visit to our pages, please log out of your Twitter user account.

3.4.9 LinkedIn

Our website uses plugins from the social network LinkedIn, Wilton Place, Dublin 2, Ireland ("LinkedIn").

The plugins are configured as a two-tier solution to protect user privacy. Each time you visit one of our pages that contains LinkedIn features, your browser will only establish a direct connection to LinkedIn's servers when you activate the LinkedIn button by clicking on it. The content of the plugin is transmitted by LinkedIn directly to your browser and integrated into the website.

When the plugin is activated, LinkedIn receives, among other things, the information that the user has accessed our website. For information about the scope and purpose of this data collection, processing and use by LinkedIn and related rights and setting options to protect user privacy, please see the LinkedIn's privacy policy https://www.linkedin.com/legal/privacy-policy?trk=hb_ft_priv.

We expressly point out that we have no influence on the type, scope and use of the data that LinkedIn collects with the LinkedIn button.

3.4.10 Xing

Our website uses plugins from the social network XING, operated by XING AG, Dammtorstraße 30, D-20354 Hamburg ("XING").

The plugins are configured as a two-tier solution to protect user privacy. Each time you visit our website, your browser only establishes a direct connection to XING's servers when you activate the XING button by clicking on it. The content of the plugin is transmitted by XING directly to your browser and integrated into the website.

DATA POLICY

When the plugin is activated, XING receives, among other things, the information that the user has accessed our website. For information about the scope and purpose of this data collection, processing and use by XING and related rights and setting options to protect user privacy, please see Xing's privacy policy <https://privacy.xing.com/en> (https://www.xing.com/app/share?op=data_protection).

We expressly point out that we have no influence on the type, scope and use of the data that XING collects with the XING button.

3.4.11 Pinterest

On our site, we use social plugins from the Pinterest social network operated by Pinterest, operated by Pinterest Inc., 808 Brannan Street, San Francisco, CA 94103-490, USA "Pinterest"). When you visit a page with a Pinterest plugin, your browser will establish a direct connection to Pinterest's servers. The plugin will then send the log files to the Pinterest servers in the USA. This log data may include your IP address, the address of the websites visited that also include Pinterest features, browser type and settings, the date and time of the request, how you use Pinterest, and cookies.

For more information on the purpose, scope, and further processing and use of the data by Pinterest, as well as your rights and privacy practices, please refer to the Pinterest's Privacy Policy <https://about.pinterest.com/en/privacy-policy>.

We expressly point out that we have no influence on the type, scope and use of the data that Pinterest collects with the Pinterest button.

3.4.12 Instagram

Our website uses features of Instagram, provided by Instagram Inc., 1601 Willow Road, Menlo Park, CA, 94025, USA. If you are logged into your Instagram account, you can link the contents of our pages to your Instagram profile by clicking on the Instagram button. This allows Instagram to associate the visit to our pages with your user account. Please note that we, as the provider of the pages, have no knowledge of the content of the transmitted data or its use by Instagram.

For more information, see the Instagram privacy policy <https://instagram.com/about/legal/privacy/>

We expressly point out that we have no influence on the type, scope and use of the data that Instagram collects with the Instagram button.

3.4.13 YouTube

Our website uses plugins from YouTube, which is operated by Google. YouTube is operated by YouTube LLC with headquarters at 901 Cherry Avenue, San Bruno, CA 94066, USA. When you visit one of the pages of our website that has a YouTube plugin, a connection is established to the YouTube servers. This informs the YouTube server which of our pages you have visited. If you are logged in to your YouTube account, this enables YouTube to link this information to your user account. You can prevent this by logging out of your

DATA POLICY

YouTube account. We use YouTube to present our online services in an appealing way. This represents a legitimate interest within the meaning of Art. 6 (1) f GDPR.

For more information on how we use user data, please refer to the Youtube privacy policy www.google.de/intl/en/policies/privacy/

4. Data recipients outside the EU

Apart from the processing described in detail in Section 3, we do not pass your data on to recipients based outside the European Union or the European Economic Area. Insofar as the processing operations listed in Section 3 transfer data to recipients located outside the European Union or the European Economic Area, the servers are located in the USA. This data transfer takes place in accordance with the principles of the Privacy Shield <https://www.privacyshield.gov/welcome> and on the basis of the Standard Contractual Clauses https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj?uri=CELEX:32021D0914&locale=en the European Commission.

5. Your rights

5.1 Overview

In addition to the right to revoke your consent granted to us, you are also entitled to the following additional rights if the respective legal requirements are met:

- **Right of access** to your personal data stored by us pursuant to Art. 15 GDPR; in particular, you may request information about the processing purposes, the category of personal data, the categories of recipients to whom your data has been or will be disclosed, the planned storage period, and the origin of your data, in case it has not been collected directly from you,
- **Right of rectification** of incorrect data or the right to have correct data completed in accordance with Art. 16 GDPR,
- **Right to deletion** of your data stored by us in accordance with Art. 17 GDPR, insofar as no legal or contractual retention periods or other legal obligations or rights to further storage are to be observed,
- **Right to restriction** of the processing of your data pursuant to Art. 18 GDPR, insofar as the accuracy of the data is disputed by you, the processing is unlawful, but you object to its deletion; the controller no longer requires the data, but you need it for the assertion, exercise or defence of legal claims or you have objected to the processing pursuant to Art. 21 GDPR,
- **Right to data portability** pursuant to Art. 20 GDPR, i.e. the right to have selected data about you stored by us transferred in a common, machine-readable format, or to request the transfer to another controller,
- **The right to lodge a complaint** with a supervisory authority. As a general rule, you can contact

DATA POLICY

the supervisory authority of your usual place of residence or workplace or our company headquarters for this purpose.

5.2 Right to object

Under the conditions of Art. 21 (1) GDPR, data processing may be objected to for reasons arising from the particular situation of the data subject.

The above **general right to object** applies to all processing purposes described in this privacy notice, which are processed on the basis of Article 6 (1 lit. f) GDPR. Unlike the specific right to object relating to data processing for advertising purposes, we are only obliged under the GDPR to implement such a general objection if you provide us with reasons of overriding importance for doing so (e.g., a possible risk to life or health). In addition, you have the option of contacting the supervisory authority responsible for **Vetrotech Saint-Gobain Deutschland GmbH**, in this instance, the data protection commissioner of the Land of Hesse in Wiesbaden.

6 Data security

All data transmitted by you personally, including your payment data, will be transmitted using the generally accepted and secure standard SSL (Secure Socket Layer) protocol. SSL is a secure and proven standard that is also used, for example, in online banking. You can recognise a secure SSL connection, among other things, by the 's' appended to the http (i.e. https://...) in the address bar of your browser or by the lock icon in the bar at the bottom of your browser.



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For more information, please visit vetrotech.com

