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CLOSE TO OUR CUSTOMERS

## **WIRTGEN LIMITED** **PRIVACY POLICY**

### **Our contact details**

Name: Wirtgen Limited  
Address: Wirtgen Group House, Overfield Park, Godfrey Drive, Newark,  
NG24 2UA  
Phone Number: 03452 412770  
E-mail: [sales.gb@wirtgen-group.com](mailto:sales.gb@wirtgen-group.com)  
Date: 01 June 2020

### **The type of personal information we collect**

We currently collect and process the following information:

- Personal identifiers, contacts and characteristics (for example, name and contact details)
- Company and role
- Email address
- Passport details (note this is only if an individual is invited to visit an overseas event)

### **How we get the personal information and why we have it**

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- Mailshots
- Invitations to company events
- Arrangements for company events

We do not receive personal information indirectly from any other sources.

We use the information that you have given us in order to:

- Send company information / mailshot to you
- Arrange travel if you are attending an event

We may share this information with Wirtgen Group companies if you are attending an overseas event.

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

**(a) Your consent. You are able to remove your consent at any time. You can do this by contacting Paul Holmes (Data Protection Officer) 03452 412770 or [paul.holmes@wirtgen-group.com](mailto:paul.holmes@wirtgen-group.com).**

**(b) We have a contractual obligation.**

**(c) We have a legal obligation.**

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**(d) We have a vital interest.**

**(e) We have a legitimate interest.**

**How we store your personal information**

Your information is securely stored on the company CRM system or on an internal spreadsheet specific to the organisation of the company event.

We keep the following personal information:

- Name and contact details on our CRM system until you inform us that you no longer want to be stored.
- Passport details / information required for travel until the specific company event takes place.

We will then dispose your information by deleting the spreadsheet for the specific event.

**Your rights regarding the processing of personal data**

We would like to inform you about your rights in the processing of your personal data. If you have any questions about your rights or wish to assert your rights against us, please contact our data protection officer at [datenschutz@wirtgen.de](mailto:datenschutz@wirtgen.de) or to the address above with the addition of „Data Protection Officer “.

**Withdrawal of your consent (Art. 7 para. 3 GDPR)**

If you have given your consent to the processing of your personal data, you can withdraw this at any time. The withdrawal of consent does not affect the legality of the processing carried out on the basis of the consent until withdrawal. You will be informed of this right of withdrawal before you give your consent.

**Right of access by the data subject right (Art. 15 GDPR)**

You have the right to ask us to confirm whether we are processing personal data about you. If this is the case, you have a right to information about this personal data. When transferring personal data to a third country or international organisation, you also have the right to be informed of appropriate safeguards to ensure that recipients comply with the provisions of the GDPR.

**Right to rectification (Art. 16 GDPR)**

You have the right to obtain from us without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

**Right to erasure or „right to be forgotten“(Art. 17 GDPR)**

You have the right to request the immediate erasure of your personal data if one of the following reasons applies:

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- Personal data for the purposes for which they were collected or otherwise processed are no longer required.
- You have withdrawn your consent and there is no other legal basis for the processing.
- You object to the processing under Art. 21 para. 2 sentence 1 GDPR for reasons arising from your particular situation and there are no compelling legitimate reasons for the processing.
- You object to the processing for direct marketing pursuant to Art. 21 para. 2 page 2 GDPR.
- The personal data have been processed unlawfully.
- The personal data must be deleted in order to fulfil a legal obligation under European or German law.
- The data were collected directly from a child in connection with an offer of information society services, Art. 8 para. 1 GDPR.

We will comply with the request for deletion, unless we are legally obliged or entitled to store and process your personal data further. In addition, we are entitled to further storage if we are unable to assert, exercise, or defend legal claims without your personal data.

### **Right to restriction of processing (Art. 18 GDPR)**

According to Art. 18 GDPR, we may only process personal data to a limited extent in the following cases if:

- You dispute the accuracy of your personal data until we can verify its accuracy.
- The processing is unlawful and you oppose the erasure the data and instead request the restriction of use.
- We no longer need the data for the purposes of the processing, but you do need them to assert, exercise or defend legal claims, or
- You object to the processing pursuant to Art. 21 para. 1 No. 2 GDPR for reasons arising from your particular situation, provided it is not yet clear whether the legitimate reasons for processing by us outweigh your interests.

If processing is restricted, we may only store this data. In this case, further processing shall only be permitted with your consent or for the purpose of asserting, exercising or defending legal claims or protecting the rights of another natural or legal person or on grounds of an important public interest of the Union or a Member State. You can withdraw your consent to this at any time. You will be notified by us before the restriction is lifted.

### **Notification obligation (Art. 19 GDPR)**

Please note that we are obliged to inform all recipients to whom your personal data has been disclosed of any correction or deletion of your data or any restriction on processing. This does not apply if such information is impossible or involves a disproportionate effort. We will inform you about those recipients if you request it.

### **Right to data portability (Art. 20 GDPR)**

You have the right to receive the personal data concerning you that you have provided to us in a structured, commonly used and machine-readable format. You also have the right that we transmit those personal data to another controller. However, this right must not impair the rights and freedoms of other persons, including our company. If this is the case, we are entitled to refuse the surrender or transfer of your personal data.

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You are not required to pay any charge for exercising your rights.

If you make a request, we have one month to respond to you.

**Right to object (Art. 21 GDPR)**

If we process your data on the basis of a legitimate interest (Art. 6 para. 1 lit. f) GDPR) you have the right to object to this if the reasons for this arise from your particular situation. This also applies to profiling based on these provisions. In this case, we will no longer process your personal data, unless we can prove compelling reasons worthy of protection for the processing. These must outweigh your interests, rights, and freedoms, or the processing serves to assert, exercise, or defend legal claims. If we process your personal data for direct marketing purposes, you may object to the processing of your personal data. This also applies to profiling insofar as it is connected with such direct advertising.

After your objection your personal data will no longer be processed for these purposes.

**Right to lodge a complaint with a supervisory authority (Art. 77 GDPR)**

You have the right to complain to a supervisory authority, in particular in the Member State where you are staying, or working, or where an alleged infringement occurred, if you believe that the processing of personal data concerning you is contrary to the General Data Protection Regulation. Other administrative or judicial remedies that you may be entitled to remain unaffected.

**Please contact us if you wish to make a request:**

Paul Holmes (Data Protection Officer)  
Wirtgen Ltd  
Wirtgen Group House  
Overfield Park  
Godfrey Drive  
Newark  
NG24 2UA

Tel: 03452 412770  
Email: [paul.holmes@wirtgen-group.com](mailto:paul.holmes@wirtgen-group.com)

**How to Complain**

If you have any concerns about our use of your personal information, you can make a complaint to us at:

Paul Holmes (Data Protection Officer)  
Wirtgen Ltd  
Wirtgen Group House  
Overfield Park  
Godfrey Drive  
Newark  
NG24 2UA  
Tel: 03452 412770  
Email: [paul.holmes@wirtgen-group.com](mailto:paul.holmes@wirtgen-group.com)

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## CLOSE TO OUR CUSTOMERS

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>