

# Data protection notice for business contacts of the Wurth Electronics Midcom Inc.



**WÜRTH  
ELEKTRONIK**  
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Version May 2024

With the following information in accordance with Art. 13, 14 GDPR, you will receive an overview of the processing of your personal data by us and your rights in accordance with the General Data Protection Regulation (GDPR).

## 1. Identity of the Data Protection Controller

Wurth Electronics Midcom Inc., 121 Airport Drive,  
Watertown, South Dakota, 57201, USA

### Location Germany:

Clarita-Bernhard-Straße 9  
81249 München, Germany

## 2. Contact data of the Data Protection Officer

If you have any questions or require information on the handling of your personal data, please contact the data protection team at Wurth Electronics Midcom Inc.

You can contact the data protection team at this e-mail address:

**data-protection-midcom@we-online.com**

## 3. Collecting and processing of your personal data – purpose and legal basis

We collect and process your data for the purpose of initiating a contractual relationship and for order processing. The legal basis for this processing is Art. 6 lit. b) GDPR (implementation of a pre-contractual measure or for the fulfilment of a contract). In addition, we use the contact details you have provided to send so-called PCN (Product Change Notification) / PTN (Product Termination Notice). This is done to fulfil a contractual obligation in accordance with Art. 6 (1) lit. b) GDPR and / or to protect our common legitimate interests, Art. 6 (1) lit. f) GDPR. The legitimate interest consists in the protection of ancillary contractual obligations, as well as your early involvement, in order to create planning security for you.

Insofar as necessary, we process your data beyond the actual purpose of the contract to protect legitimate interests, Art. 6 (1) lit. f) GDPR, for the further development and improvement of our offers and for business management. Furthermore, there is a legitimate interest in the form of risk management within the group of companies. In individual cases, we process your personal data in order to conduct direct advertising. Within the scope of the legitimate interest pursuant to Art. 6 (1) lit. f) GDPR, we also use your data to inform you about comparable offers and products.

When you make use of free services, such as the download of a white paper/publication provided free of charge, we also obtain your consent in accordance with Art. 6 (1) lit. a) (consent), for advertising purposes. You therefore consent to us informing you by post, telephone or e-mail about Wurth Electronics Midcom Inc. products or services. In addition, it is possible that any partner companies that have contributed to the creation of the free service (whitepaper/publication) may also advertise to you via the aforementioned advertising channels.

**You can unsubscribe your advertising consent at any time at: data-protection-midcom@we-online.com. In case you do not want to receive any more advertising from a partner company, please send your revocation directly to the respective company.**

In the event of the data having to be processed for any other reason, the data subject will be provided with information about this additional processing. In the event of registration for a Wurth Electronics Midcom Inc. event, the data you provide will be used for the purpose of event participation. The data you provide enables us to register you at the event according to your own specifications, to contact you for this purpose and thus to enable the event to run smoothly. For some events, we may contact you afterwards for promotional purposes. If you give us your consent to use your data for advertising purposes, we will process your data to inform you about Wurth Electronics Midcom Inc. products or services by post, telephone or e-mail. The legal basis for this data processing is Art. 6 (1) lit. a) (consent), Art. 6 (1) lit. b) GDPR (fulfilment of a contract) and in any case the existence of a legitimate interest in accordance with Art. 6 (1) lit. f) GDPR. The legitimate interests are to make your participation as pleasant as possible for you, to enable exchanges between participants during and after the event, and to provide you with information about products and services (recital 47 of the GDPR).

In addition to personal data that we receive directly from you, we also process and collect data for supplementation and validation, through our own research and with the help of third parties. In accordance with Art. 14 GDPR. The legal basis for this is the principle of data accuracy according to Art. 5 (1) d) GDPR as well as the protection of our legitimate interests for the purpose of verifying and updating our database according to Art. 6 (1) lit. f) GDPR. The data is used exclusively for the purposes stated here.

For the purpose of preventing corruption, we collect and document your personal data - in particular your first and last name, as well as the company in which you work - in order to be able to provide proof of the avoidance of bribery in business transactions, e.g. for business meals or other business events. The processing of your personal data is carried out in our legitimate interest in accordance with Art. 6 (1) f) GDPR. Our legitimate interest lies in the need for detailed documentation and compliance of relevant transactions.

## 4. Recipients

Wurth Electronics Midcom Inc. uses specialized technical service providers for the technical processing of your personal data. These service providers are carefully selected and are legally and contractually obliged to ensure a high level of data protection. The order processing of your data is carried out in accordance with Art. 28 GDPR.

We commission shipping companies to carry out your orders. Like us, they are legally obliged to ensure and maintain a high level of data protection. We will only pass on your personal data to third parties for purposes other than those mentioned here if there is a legal obligation to do so in the form of an overriding legal provision (e.g. in the case of an audit).

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Participation in the event for free may make it possible for us to pass on your data to the respective organizer for registration purposes. This could also be an international affiliated company within the Würth Elektronik Group in whose country or in whose name the event takes

place. These are listed [here](#). Würth Electronics Midcom Inc. sometimes uses service providers (e.g. technical service providers, etc.) to register for an event and/or as part of the actual implementation (e.g. creating nametags for participants or lists of participants). These service providers are carefully selected and are legally and contractually obliged to ensure a high level of confidentiality. Your data will be processed in accordance with **Art. 28 GDPR**.

Depending on your location, it is possible that your contact data may be passed on to the responsible international sister company within the Würth Electronics Midcom Inc., Group to get in contact with you.

## 5. Data security

The personal data collected and stored by us will be treated confidentially and protected against loss and changes as well as unauthorised access by third parties by means of suitable technical and organisational precautions.

## 6. Duration of storage

Your personal data will be stored by us for as long as is necessary to fulfil the contractual obligations and to achieve the contractual purpose. In addition, there are retention obligations and periods issued by the legislator or supervisory authorities. Upon expiry of the retention obligations and periods, your data will be deleted as part of a routine procedure. If data is not subject to the aforementioned retention obligation, it will be deleted as soon as its storage is no longer required for the intended purpose. It should be noted that the business relationship may develop into a continuing obligation which is intended to last for several years.

An obligation to retain data after the contractual or legal obligation has been fulfilled may arise as follows:

- Retention periods under commercial and tax law. The periods specified there for storage and / or documentation are up to 10 years after termination of the business relationship or with the conclusion of the individual order.
- Preservation of evidence within the statute of limitations according to §§ 195 ff. BGB. The standard limitation period is 3 years. However, limitation periods can be up to 30 years.

## 7. Your rights

If the legal requirements are met, you have the right to request information from us about personal data or data processing relating to

you (Art. 15 of the GDPR), correction, deletion and restriction of personal data or data processing relating to you (Art. 16 to 18 of the GDPR) and transfer of personal data relating to you (Art. 20 of the GDPR).

**In addition, you have the right to object to data processing based on a "legitimate interest" of the controller pursuant to Art. 6 (1) (f) GDPR if the legal requirements pursuant to Art. 21 GDPR are met. This includes in particular the use of your personal data for the purpose of direct marketing.**

To exercise all these rights **or if you wish to revoke a granted declaration of consent** to the processing of your personal data, **in whole or in part, with effect for the future, please send us an email to:**

**[data-protection-midcom@we-online.com](mailto:data-protection-midcom@we-online.com)** or a message to the address mentioned under point 1.

Furthermore, pursuant to Art. 77(1) of the GDPR, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your place of residence, place of work or place of the alleged infringement, if you consider that the processing of personal data concerning you infringes the GDPR.

The competent supervisory authority is: Der Bayerische Landesbeauftragte für den Datenschutz (BayLfD), Postfach 22 12 19, 80502 München (Wagmüllerstraße 18, 80538 München).

Supplementary data protection notices, in particular on your rights to access, rectification, erasure, restriction of processing, data portability, opposition and to lodge a complaint, see our data protection notice at **[www.we-online.com/privacy](http://www.we-online.com/privacy)**