



Data Protection Notice Business Contact

of Wuerth Elektronik Stelvio Kontek S.p.A

Version January 2022

This notice provides you with an overview of the processing of your personal data and your rights as pursuant to the General Data Protection Regulation (GDPR) of the European Union.

1. Identity of the Data Protection Controller

The body responsible for data processing:

Name: Wuerth Elektronik Stelvio Kontek S.p.A.

Street: via Al Mognago, 49

Location: 23848 Oggiono (LC) - ITALY

2. Contact data of the Data Protection Officer

Considering that, Wuerth Elektronik Stelvio Kontek S.p.A.:

- is not a public authority or body
- the core activities of the controller or the processor doesn't consist of processing operations which, by virtue of their nature, their scope and/or their purposes, require regular and systematic monitoring of data subjects on a large scale
- the core activities of the controller or the processor doesn't consist of processing on a large scale of special categories of data pursuant to Art. 9 GDPR or personal data relating to criminal convictions and offences referred to in Art. 10 GDPR
- does not fall within the categories referred to in Art. 37 (1) GDPR Rules we decide to not appoint any Data Protection Officer. Nevertheless, for questions and information pertaining to the handling of your personal data, please contact the Data Protection Coordinator of Würth Elektronik Stelvio Kontek S.p.A. at any time.

Role: Data Protection Coordinator

Street: via Al Mognago, 49

Location: 23848 Oggiono (LC) ITALY

Phone: 0039 0341 - 264.468

e-mail: protezione-dei-dati@stelvio-kontek.com

3. Collecting and processing of your data provided by you - purpose and legal basis

We collect and process your data for the purpose of initiating a contractual relationship and processing orders. The legal basis for the processing of your data is Art. 6 (1) lit. b) GDPR (prior to entering into a contract or necessary for the performance of a contract).

In addition, we use your contact data to send so-called PCNs (Product Change Notification) / PTNs (Product Termination Notice). This is done to fulfil a contractual obligation pursuant to Art. 6 (1) lit. b) GDPR or to safeguard our common interests pursuant to Art. 6 (1) lit. f) GDPR. The legitimate interest lies in the interests of respecting contractual duties of data protection as well as ensuring your early involvement so as to create reliability in planning. If necessary, we process your data beyond the

purposes of the contract to protect legitimate interests as pursuant to Art. 6 (1) lit. f) GDPR, to develop and improve our offers and manage business activities. Furthermore, there is a legitimate interest in maintaining risk management within the Group. Within the context of the legitimate interest in accordance with Art. 6 (1) lit. f) GDPR, we also use your data to inform you about similar deals 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) GDPR** (consent), for advertising purposes. You therefore consent to us informing you by post, telephone or e-mail about Würth Elektronik 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 protezione-dei-dati@stelvio-kontek.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 addition to personal data that we receive directly from you, we also process and collect data for supplementation and validation through our own research in accordance with **Art. 14 of GDPR**. The legal basis for this is the principle of data accuracy pursuant to Art. 5 (1) d) GDPR as well as the protection of our legitimate interests for the purpose of verifying and updating our database pursuant to Art. 6 (1) lit. f) GDPR. The data is used exclusively within the scope of the purposes stated here

In the event of registration for a Würth Elektronik Stelvio Kontek S.p.A. 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. The purpose is 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**). For some events, we may contact you afterwards for promotional purposes. We may use your data for advertising purposes, to inform you about similar deals and products, which is a legitimate interest and in accordance with **Art. 6 (1) lit. f) GDPR**. In this regard we have carried out the balancing exercise required by data protection law and met general obligations under the GDPR accountability principle. We will process your data to inform you about Würth Electronics products or services by post, telephone or e-mail. The legal basis for this data processing is **Art. 6 Art. 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**.



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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

Würth Elektronik Stelvio Kontek S.p.A. enlists specialised technical service providers within the scope of the technical processing of your personal data for order processing. These service providers are carefully selected and legally and contractually required to ensure a high level of data protection. The order processing is conducted in accordance with Art. 28 GDPR.

We contract a shipping company to complete your order. These companies are legally required, as are we, to ensure and observe a high level of data protection. We only share your personal data with third parties for other purposes than those mentioned here insofar as we are legally obligated to do so in the form of an overriding legal provision (e.g., in the event of an audit).

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 Elektronik 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 Elektronik eiSos Group to get in contact with you.

5. Data security

The personal data collected and stored by us will be handled confidentially and protected by appropriate technical and organizational measures against loss and modification as well as unauthorised access by third parties.

6. Duration of storage

We store your personal data for as long as is necessary to fulfil our contractual obligations and to achieve the contractual purpose. In addition, retention obligations and periods as stipulated by law or authorities are also in effect. Once these retention obligations and periods expire, it is standard procedure to delete your data. If any data are not subject to the aforementioned obligation, they are deleted as soon as their storage is no longer required for the intended purpose. It should be noted that the business relationship may evolve into a continuing obligation, which can last several years.

Even after attaining the contractual or legal obligation, a retention obligation may remain in effect as follows:

- Commercial and tax retention periods. The prescribed time limits for retention and/or documentation are up to 10 years after termination of the business relationship or completion of an individual order.

7. Your rights

If all legal requirements have been fulfilled, you have the right to request from us access to your personal data or the data processing (Art. 15 GDPR) and the rectification, erasure and restriction of your personal data or data processing (Art. 16 to 18 GDPR) as well as the transfer of your personal data (Art. 20 GDPR).

In addition, if all legal requirements have been fulfilled you have a right to object to the processing of your data as pursuant to Art. 21 GDPR, which is based on a "legitimate interest" pursued by the controller in accordance with Art. 6 (1) lit. f) GDPR. If you wish to exercise these rights or if you want to revoke your consent to the processing of personal data, in full or in part, with effect for the future, please send an email to:

- protezione-dei-dati@stelvio-kontek.com
- or send a letter to the address listed in Item 1.

Furthermore, according to Art. 77 (1) GDPR you also have the right to lodge a complaint with a supervisory authority, in particular in the Member State where you reside or work or where the alleged violation takes place if you believe that the processing of your personal data is in violation of GDPR.

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 and
www.stelvio-kontek.com/protezionedeidati/contatticommerciali-italiano
www.stelvio-kontek.com/privacy/businesscontact-italy