

## Information on data processing in accordance with Articles 13 and 14 of the General Data Protection Regulation (GDPR / DSGVO)

### Data protection

Compliance with the GDPR [General Data Protection Regulation] and all applicable data protection laws is of great importance to AGRANA-STUDEN Sugar Trading GmbH. The same is expected from our business partners. We therefore process your personal data ("data" for short) solely on the basis of the legal provisions. With the privacy policy we want to inform you comprehensively about the processing of your data in our company and the data protection claims and rights to which you are entitled.

#### 1. Who is responsible for data processing and whom can you contact?

Company: AGRANA-STUDEN Sugar Trading GmbH  
Address: Wilhelminenstr. 91/19/2, 1160 Vienna, Austria  
Phone: +43 (0) 1/486 24 24  
E-mail: [info@agrana-studen.com](mailto:info@agrana-studen.com)

#### 2. Which data are processed and from which sources does this data come from?

We process the data that we receive from you as part of the business relationship. In addition, we process legitimately received data from companies with which we have a permanent business relationship.

- 2.1.1. We process for the purposes of **customers and suppliers Master Data Management** the following personal information: Last name, first name, company, street, postal code, city, country, e-mail address, VAT number, payment terms
- 2.1.2. When **creating sales contracts** or other printed documents, we process the following personal data: Last name, first name, company, street, zip code, city, country, e-mail address
- 2.1.3. For purposes of **bookings**, the following personal data is processed: Last name, first name, company, street, postal code, city, country, e-mail address, VAT number, payment conditions
- 2.1.4. For the purpose of **other payments**, the following personal data will be processed: Last name, first name, company, street, postal code, city, country, e-mail address, documents, bank details, employment-related data, payroll tax, health / pension insurance

#### 3. For what purposes and on what legal basis is the data processed?

We process your data in accordance with the legal provisions:

- The personal data you provide us in the context of **customers and suppliers for Master Data management** are only used for archiving or contact and for the associated technical administration. The data will not be forwarded to third parties.
- For **creation of sales contracts**, we use the data provided to create the contract as a printed document, and then send it back by electronic post to the contractor.
- The personal data you provide us for **bookings** are used for booking purposes and for archiving or to establish a contact and for the associated technical administration. The data will be forwarded to our tax advisor HFP Steuerberatungs GmbH after processing.

- The personal data you provide us in the context of **other payments** are used once and according to requirements. Your personal data will furthermore not be published.
- **for the fulfillment of (pre-) contractual obligations (Art. 6 para. 1 lit.b GDPR/DSGVO):**  
Your data is processed for the sale and distribution of our goods and services, for procurement and logistics purposes as well as for customer administration and analysis. The data will be processed in particular at business initiation and during the execution of contracts with you.
- **for the fulfillment of legal obligations (Art. 6 para. 1 lit.c DSGVO):**  
Processing of your data is required for the purpose of meeting various legal obligations, e.g. from the company code (UGB) or the federal tax code (BAO), money laundering regulations as well
- **for the protection of legitimate interests (Art. 6 para 1 lit.f GDPR/DSGVO):**  
Due to a balancing of interests, data processing beyond the actual fulfillment of the contract may be carried out to safeguard legitimate interests of us or third parties. Anyhow, in the following cases, data processing takes place to safeguard legitimate interests:
  - Business management and development of services and products
  - Maintain the customer database to improve customer service
  - Measures to protect against contractual or illegal behavior
  - in the context of legal action.
- **in the context of your consent (Art. 6 para. 1 lit.a GDPR/DSGVO):**  
If you have given us consent to the processing of your data, processing will only take place in accordance with the purposes set out in the declaration of consent and to the extent agreed therein. A given consent can be revoked at any time with effect for the future, as far as legitimate interests such as retention periods are not opposed. Please contact our e-mail address given in point 1.

#### 4. Who receives my data?

Your personal data can be processed by AGRANA STUDEN Sugar Trading GmbH and HFP Steuerberatungs GmbH. Your personal data will furthermore not be published.

The data will be processed, used as necessary for the fulfillment of the contractual relationship. In order to achieve the intended purposes, it may occasionally be necessary for us to pass on your data to third parties (in particular our service providers and processors).

If we have contracted processors, we will still be responsible for protecting your data. All processors are contractually obliged to treat your data confidentially and process it as part of the service provision. The processors commissioned by AGRANA STUDEN Sugar Trading GmbH will receive your data if they need the data to fulfill their respective services. These are for example:

- IT service providers that we need for the operation and security of our IT systems
- Service providers who are responsible for the programming and maintenance of our applicant database / customer database / supplier database

In addition, AGRANA STUDEN Sugar Trading GmbH may be legally obliged to disclose your data if the disclosure of the data for asserting, exercising or defending legal claims of the client against an authority is necessary.

## 5. How long will my data be stored?

- The data in point 2.1.1. to 2.1.3. that are pointed out and you have sent to us is stored until it is revoked.
- All personal data mentioned in point 2.1.4., will be deleted as soon as they were transmitted.

## 6. Which data protection rights do I have?

You have the right to information, correction, deletion or restriction of the processing of your stored data, a right to object to the processing as well as a right to data portability and to a complaint in accordance with the requirements of data protection law.

### 6.1 Right to information:

You can ask us for information regarding whether and to what extent we process your data.

### 6.2 Right to rectification :

If we process your data that is incomplete or incorrect, you may at any time ask for their correction or completion.

### 6.3 Right to cancellation:

You may request deletion of your data from us if we process it unlawfully or if the processing disproportionately interferes with your legitimate interests. Please note that there may be reasons for an immediate cancellation, eg in the case of legally regulated storage requirements.

### 6.4 Right to restriction of processing:

You may require us to restrict the processing of your data if

- You deny the accuracy of the data for a period of time that allows us to verify the accuracy of the data.
- the processing of the data is unlawful, but you reject a deletion and instead require a restriction of data usage,
- we no longer need the data for the intended purpose, but the data is still needed to assert or defend legal claims, or
- You have lodged an objection to the processing of the data.

### 6.5 Right to Data Portability:

You may require that we provide you with the information you have provided to us in a structured, common and machine-readable format and that you may transfer that information to another person without hindrance, provided that

- We process this data based on a consent given or revocable by you or for the performance of a contract between us, and
- This processing is done using automated methods.

In case of technical feasibility, you can request from us a direct transfer of your data to another person in charge.

### 6.6 Right to object:

If we process your data for legitimate interest, you can object to this data processing at any time for reasons that arise from your particular situation; We will then no longer process your data unless we can demonstrate compelling legitimate grounds for processing that outweigh your interests, rights and freedoms, or processing



for the purposes of asserting, exercising or defending legal claims. You can object to the processing of your data for the purpose of direct mail at any time without stating reasons.

#### 6.7 Complaint right:

If you believe that we violate Austrian or European data protection laws while processing your data, we ask you to contact us in order to clarify any questions. Of course you also have the right to claim in the

Austrian Data Protection Authority  
Wickenburggasse 8  
1080 Vienna  
Telephone: +43 1 52 152-0  
E-mail: [dsb@dsb.gv.at](mailto:dsb@dsb.gv.at)

or to complain to a national supervisory authority within the EU.

#### **7. Where can I assert my rights?**

If you want to assert one of the mentioned rights against us, please contact us [info@agrana-studen.com](mailto:info@agrana-studen.com). In case of doubt, we may request additional information to confirm your identity. This is to protect your rights and privacy.

#### **8. Am I committed to provide data?**

The processing of your data is required to complete or fulfill your contract with us. If you do not provide us with this data, we will generally be required to refuse the conclusion of the contract or the execution of the contract or be unable to complete an existing contract and consequently terminate it. However, you are not obliged to give your consent for data processing with regard to data that are not relevant or legally required for the fulfillment of the contract.

#### **9. Application data**

If you send us your application, your application data will only be made available to authorized persons involved in the application process.