

Privacy Notice Regarding the Collection of Personal Data According to Articles 13, 14, and 21 of the General Data Protection Regulation (GDPR) for Customers and Suppliers

This notice informs you about the processing of your personal data and your rights under data protection law. The specific data processed and the manner of processing depend largely on the nature and scope of the business relationship or service.

1. Controller and Contact Information

Controller

IDS Imaging Development GmbH
Dimbacherstr.10
74182 Obersulm

Telefon: +49 7134 96196-0

dataprotection@ids-imaging.com

Data Protection Officer

EmEtz GmbH

Mail: dataprotection@ids-imaging.com

2. Purpose and Legal Basis of Data Processing

We process personal data in compliance with the EU General Data Protection Regulation (GDPR) and all other relevant laws. The processing of personal data (Art. 4 No. 2 GDPR) is generally always necessary if a business relationship with you is being initiated or already exists. The specific purposes arise from the nature of the agreed service. Below, we inform you about the “core processing activities” in our company. In addition, there may be further processing operations, about which you will be informed separately in the respective process.

Based on your consent (Art. 6(1)(a) GDPR, Art. 9(2)(a) in conjunction with Art. 7 GDPR)

If you have given us consent to process specific data (e.g., for newsletters, direct marketing, appointment reminders, or the publication of images), the processing is carried out on that basis. Consent that has been given can be revoked at any time. Please note that the revocation applies only to future processing. Any processing carried out before the revocation remains unaffected.

For the fulfillment of contractual and pre-contractual obligations (Art. 6(1)(b) GDPR)

The primary purpose of data processing is the initiation, execution, and handling of our business relationships. Processing is carried out for order, booking, and application handling, quotation preparation, and all pre-contractual measures, including confirmation of the above matters. Additionally, processing is performed for customer master data management, particularly the structured collection, maintenance, and use of relevant data to handle customer inquiries, orders, and communication.

In supplier master data management, processing is carried out for managing delivery information,



awarding contracts, goods receipt, and quality assurance. Where necessary, personal data is processed to provide our services. In the course of billing, personal data of contact persons is processed in connection with invoicing.

Processing also takes place for the provision of services, including training sessions, user seminars, and online meetings related to our business relationships, as well as necessary communication and collaboration within the scope of contractual relationships.

As part of a balancing of interests (Art. 6(1)(f) GDPR)

Where necessary, we also process your data to safeguard legitimate interests of our own or those of third parties. This may include, for example, ensuring IT security and safe IT operations, supplier evaluations, customer satisfaction surveys, product and process improvement (validation of our products), and the creation of statistics.

Additionally, personal data may be processed on a case-by-case basis if required for the prevention and investigation of criminal offenses or for credit checks with credit agencies.

The sending of postal or digital advertising to promote the company and increase sales, as well as any measures related to corporate management, is carried out based on our legitimate interests.

If AI technologies, including generative AI (e.g., ChatGPT, Microsoft Copilot), are used to support processes (e.g., analyzing and processing business documents, assisting in the creation of texts, summaries, and emails, improving internal efficiency and knowledge sharing), personal data may be processed in individual cases, especially if contained in business documents.

According to our internal policies on the use of generative AI, personal data of business partners as well as confidential information and trade secrets must not knowingly be entered into generative AI systems unless these systems are operated entirely under our control (e.g., locally or within secured company infrastructure). Our employees are obligated not to enter sensitive or confidential content (e.g., contract data, pricing information, personal data) into publicly or cloud-based generative AI models. The use of such services is strictly in accordance with our internal data protection and security policies and with applicable confidentiality agreements.

Processing Based on Legal Obligations (Art. 6(1)(c) GDPR)

In the area of legal obligations, your personal data is processed particularly due to commercial and tax-related retention periods, as well as any required disclosures to authorities, for accounting and bookkeeping purposes.

3. Which categories of data do we use and where do they come from?

The categories of personal data we process include in particular your master data (such as name and contact details), contract and billing data (such as bank account information). We also process log and protocol data, technical data, including login application data, identification data, device passwords, system-related log data, IP addresses when accessing applications, geographic location information, device logs and timestamps, and usage data, which includes activities and interactions.



If we conduct training sessions or user seminars, we also process qualification data. For online meetings, we process the data required for the meeting (e.g., user details, meeting metadata, connection data, and any data you enter during the online meeting). If you have given us your consent, we also process image data.

Your data is generally collected directly from you. In addition, we obtain data from third parties where necessary. This includes, among other things, data provided by authorities and public institutions (such as tax offices).

4. To whom is the data disclosed (categories of recipients)

Data processing within the company

Certain data processing operations are consolidated within our company. These are handled centrally by specialized departments. In this context, your data may be processed, for example, for telephone customer service, invoice processing, or mail handling.

Within our corporate group, your data is transferred to specific companies if they centrally perform data processing tasks for the affiliated companies in the group (e.g., human resources department, centralized IT).

External contractors and service providers (this also includes data processors)

In addition, we use various service providers to fulfill our contractual and legal obligations as part of data processing agreements (e.g., external paper disposal companies). When using Microsoft 365 services, Microsoft acts as our data processor. In the course of using Microsoft 365 services, your data is stored in Europe, in appropriate data centers. Furthermore, we may transfer your personal data to additional recipients outside the company if this is necessary to fulfill contractual and legal obligations or for work organization purposes. These may include, for example:

- Authorities (e.g. tax authorities)
- Courts
- Banks
- Transport companies

Data transfer to third countries

The transfer of personal data to third countries (countries outside the EU and the European Economic Area – EEA) or to an international organization only takes place if it is necessary for initiation purposes, if the disclosure is legally required, or if you have given us your consent — and only in compliance with the data protection requirements prescribed for such transfers.

When using Microsoft 365, data may be transferred to the service provider's parent company, even if the selected server location is in Europe cannot be completely ruled out. Therefore, we inform you that under the so-called "Data Privacy Framework" (DPF), the European Commission has also recognized the level of data protection as adequate for certain companies from the USA as part of the adequacy decision dated July 10, 2023.



The list of certified companies and further information about the DPF can be found on the website of the U.S. Department of Commerce at <https://www.dataprivacyframework.gov/>

Microsoft Corporation is a U.S.-based multinational hardware and software developer headquartered in Redmond. The company is certified under the DPF. If no certification is in place and a data transfer occurs or cannot be ruled out, the level of data protection is otherwise ensured, in particular through standard contractual clauses with the provider.

5. Further information

Duration of data storage

Where necessary, we process and store your personal data for the duration of our business relationship. This also includes the initiation and execution of a contract/order. In addition, we are subject to various retention obligations, which arise, among other things, from the German Commercial Code. Finally, the storage period is also determined by the statutory limitation periods, which are generally 3 years but can be up to 30 years in some cases

Data subject rights

You may request information about the personal data stored about you using the contact details provided above (Art. 15 GDPR). In addition, under certain conditions, you may request the correction or deletion of your data (Art. 16 and 17 GDPR).

You have the right to request the restriction of the processing of your personal data (Art. 18 GDPR). Furthermore, you have the right to receive the data you have provided in a structured, commonly used, and machine-readable format (Art. 20 GDPR).

Obligation to provide data

As part of initiating or maintaining a business relationship with us, you are generally only required to provide the data necessary for establishing, executing, or terminating this relationship. Without providing the required data, we may have to refuse to establish a business relationship, may be unable to carry it out, or may even have to terminate it.

Right to lodge a complaint

You have the option to file a complaint with the data protection officer mentioned above or with a data protection supervisory authority.

Right to object

If we process your data to safeguard legitimate interests, you may object to this processing if there are reasons arising from your particular situation that speak against the data processing. In such cases, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms, or the processing serves the establishment, exercise, or defense of legal claims.

Obersulm, Dezember 2025

