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## INFORMATION ABOUT DATA PROTECTION ON OUR WEBSITE

This statement is compulsory in accordance with the General Data Protection Regulation (DSGVO).

### 1. PRELIMINARY NOTE

The following sections provide you with information concerning all aspects of our dealings with your personal data. The legislator has stipulated which information is necessary. If you would like to know more, please see the DSGVO Art. 12-22 and 34. The complete text of the DSGVO is available online at: [www.datenschutz-grundverordnung.eu](http://www.datenschutz-grundverordnung.eu). If you have any questions about the DSGVO, please contact our data protection officer and/or administration.

### 2. WHAT ARE PERSONAL DATA?

All information pertaining to a defined or definable person. Persons are definable if they can be directly or indirectly identified. This can, for example, be the result of tracking an identifier such as a name, an identification number, location data, an online identifier or one or more specific characteristics.

### 3. BASIC INFORMATION

#### 3.1. Who is responsible for processing my data?

Responsibility for data processing is held by:

steute Technologies GmbH & Co. KG  
Brückenstr. 91  
32584 Löhne

#### 3.2. How can I contact you?

Contact partner: Susanne Ruge  
Email: [datenschutz@steute.com](mailto:datenschutz@steute.com)

#### 3.3. Which regulatory body is responsible for controlling and enforcing data protection?

Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen  
Postfach 20 04 44  
40102 Düsseldorf, Germany

Email: [poststelle@ldi.nrw.de](mailto:poststelle@ldi.nrw.de)  
Tel.: +49 211 38424-0  
Fax: +49 211 38424-999,



### 3.4. How can I contact the data protection officer at your company?

The data protection officer for steute is the SK-Consulting Group GmbH, Mr. Lüllemann. Contact as follows:

Postal address:

SK-Consulting Group GmbH  
Herr Karl-Uwe Lüllemann  
Osterweg 2  
D - 32549 Bad Oeynhausen  
Email: [datenschutz@sk-consulting.com](mailto:datenschutz@sk-consulting.com)  
Telephone: +49 5731 4906430

## 4. ADDITIONAL IMPORTANT INFORMATION

### 4.1. Why does your company process my data?

Data are collected and processed in order to deal with your ongoing concerns, as well as to improve the user-friendliness of our website.

### 4.2. Why is your company permitted to process my data?

Current data protection legislation (= EU General Data Protection Regulation) permits the processing of your data (= personal data) if we have a legitimate interest (see 4.1) and can assume that you have no serious objections (Legitimate interest, Art. 6 Par. 1 it. f DSGVO). You can withdraw your consent at any time.

If, for example, you use our *webshop* or request an *individual consultation*, the DSGVO permits us to process your data for the purposes of initiating and closing a contract with you in accordance with Art. 6 Par. 1 lit. b DSGVO.

If you have given us your *consent*, for example in order to receive our *newsletter* or *white papers* or regarding *cookies* etc., if applicable for the transfer of data to our subsidiary, the General Data Protection Regulation permits us to process your data in accordance with Art. 6 Par. 1 lit. a DSGVO. You can withdraw your consent at any time and with future effect.

### 4.3. Which data of mine are collected?

- IP address in an anonymised form to identify the point of access
- referrer (previously visited website)
- requested internet page or file
- browser type and browser version
- operating system used
- device type used
- time and date of access
- as well as data which you communicate to us directly
  
- If you register for our newsletter:
- Title
- First name and surname



- Company
- Email address
- Country
- (optional) Department
- (optional) Address
- (optional) Postcode
- (optional) Town/city
- Documented consent within the framework of the double-opt-in procedure (from which IP address was confirmation of registration for the newsletter sent)

#### 4.4. In which statistics are my data used?

If you have declared your consent, the following anonymised statistics will be collected:

- visitor numbers: visitors, sessions, pages called up, search engine robots;
- visitor behaviour: duration of sessions, pages called up per session, drop-off rate;
- page analysis: entry pages, exit pages, error pages, most-visited pages, pages with a high drop-off rate, search terms;
- original pages: all original pages, referring pages;
- visitor locations;
- browsers and systems: browsers, browser versions, operating systems, operating system versions.

#### 4.5. Who can my data be passed on to?

Within the framework of data processing, your anonymised data can be viewed by our contractually bound website provider. Anonymised means that the data cannot be matched to you.

They can also be passed on to third-party service providers who help us to optimise our website and who receive your data in accordance with your declaration of consent.

If you are located in France or Italy or Brazil, we will pass on your data with your consent to our subsidiary in France (steute France SARL, Inovallee 31C, Chemin du vieux chêne, F - 38240 Meylan) or Italy (steute Italia srl, Via Curtatone, 1, I - 20019 Settimo Milanese (MI)) or Brazil (steute do Brasil, Avenida Avelino Capellato, 270, Santa Claudina, BR - 13284-480 Vinhedo - SP) so that you can also receive the separate newsletter from that subsidiary (with country-specific topics, in the language of that country...).

During the processing of contact form queries, your data could be passed on to:

- persons within our company who are directly involved in data processing
- service providers who are contractually bound to secrecy and who assume some data processing tasks for us
- external companies, where absolutely necessary. Examples include post office workers delivering letters, our own subsidiaries and our own sales partners.

#### 4.6. Will my data be passed on to countries outside the EU?

There is no principal contractual agreement to this effect. In exceptional cases, the full IP address could be passed on to a Google server in the USA and anonymised there.

The transfer of personal data involves privacy-related risks for persons whose data are transferred to the USA.

US authorities (esp. secret services) have inspection rights (in particular acc. to Section 702 of the Foreign Intelligence Surveillance Acts [FISA 702] and Executive Order 12 333) which EU citizens are unable to refute. This US-American



legal basis permits access to data from electronic communication services used by non-US citizens, without a court order or property rights.

Accordingly, with regard to legal protection in the courts, EU citizens do not have the same legal options (right of appeal) as American citizens to stop the processing of personal data by the American authorities.

The US conducts data processing on a grand scale, without granting a degree of protection corresponding to that guaranteed in the EU by Art. 7 (respect for private and family life) and Art. 8 (protection of personal data) of the EU Charter of Fundamental Rights.

They can also be passed on to third-party service providers in other countries, who help us to optimise our website and who receive your data in accordance with your declaration of consent.

If you are located in Brazil, we will pass on your data with your consent to our subsidiary in Brazil (steute do Brasil, Avenida Avelino Capellato, 270, Santa Claudina, BR - 13284-480 Vinhedo - SP) so that you can also receive the separate newsletter from that subsidiary (with country-specific topics, in the language of that country...).

#### 4.7. How long will you store my data?

Your IP address is anonymised by our internet provider from the first day. Data entered on our contact form, our newsletter registration form or our Shop registration form are stored for the period of time required in order to process your request. (We store your data for as long as is necessary in order to fulfil the purposes laid out in Section 4.4.). However, some legislation (e.g. the German Tax Code § 147) compels us to keep certain data for 6 or 10 years. At the end of this period, all data no longer required will be deleted.

#### 4.8. Newsletter

For registrations to our Newsletter, we use the so-called double-opt-in procedure. This means that once you have sent us your email address, we will send you a confirmation email in which we in turn ask you to confirm that you wish to receive our Newsletter. If you do not confirm within 24 hours, your registration will automatically be deleted.

Once you have confirmed your wish to receive our Newsletter, we will store your email address until you decide to cancel the Newsletter. Storage serves the sole purpose of being able to send you the Newsletter. In addition, during the registration and confirmation processes we will store your IP address and the date/time to exclude fraudulent use of your personal data.

Compulsory fields for receipt of our Newsletter are marked. Completion of other, non-marked fields is voluntary and will only be used to personalise the Newsletter. Your data will not be passed on to third parties.

If you are located in France or Italy, we will pass on your data to our subsidiary in France (**steute France SARL**, Inovallee 31C, Chemin du vieux chêne, F - 38240 Meylan) or Italy (**steute Italia srl**, Via Curtatone, 1, I - 20019 Settimo Milanese (MI)) to facilitate direct communication with your responsible contact partner.

If you are located in France or Italy or Brazil, we will pass on your data with your consent to our subsidiary in France (steute France SARL, Inovallee 31C, Chemin du vieux chêne, F - 38240 Meylan) or Italy (steute Italia srl, Via Curtatone, 1, I - 20019 Settimo Milanese (MI)) or Brazil (steute do Brasil, Avenida Avelino Capellato, 270, Santa Claudina, BR - 13284-480 Vinhedo - SP) so that you can also receive the separate newsletter from that subsidiary (with country-specific topics, in the language of that country...).

You can withdraw your consent at any time by sending an email to [news@steute.com](mailto:news@steute.com) or by writing to the contact address stated in our Imprint. Following withdrawal of your consent, all your data will be deleted.



#### 4.9. Contact form

If you send a query to us via our contact form, the details you state on the form, including your contact data, will be stored by us for the purposes of processing your query and in case of any follow-up questions. We will not pass on any data without your consent.

Processing of your data as stated on the contact form is exclusively on the basis of your consent (Art. 6 Par. 1 lit. a DSGVO). You can withdraw your consent at any time. A simple email to our address is sufficient. The legality of all acts of data processing before your consent is withdrawn remains unaffected by the withdrawal of your consent.

The details you state on the contact form will remain stored by us until you ask us to delete them, until you withdraw your consent to data storage, or until the purpose of the data storage becomes null and void (e.g. upon completion of the processing of your request). Mandatory legal regulations – especially retention periods – remain unaffected.

#### 4.10. Appointment requests

If you contact us with an appointment request, your details will be stored for the processing of your request and for any follow-up enquiries. We will not pass on any data without your consent.

All processing of your data will be performed exclusively on the basis of Art. 6 Par. 1 lit. b GDPR (pre-contractual situations).

Your data will continue to be stored until the purpose of the storage ceases to exist. Statutory legal requirements – in particular retention periods – remain unaffected.

#### 4.11. Sample orders

If you order a product sample, your details will be stored for the processing of your sample order and for any follow-up enquiries. We will not pass on any data without your consent.

All processing of your data will be performed exclusively on the basis of Art. 6 Par. 1 lit. b GDPR.

Your data will continue to be stored until the purpose of the storage ceases to exist. Statutory legal requirements – in particular retention periods – remain unaffected.



#### 4.12. Essential Cookies

Essential cookies are required for basic functions of the website and shop. This ensures that the website functions properly.

Name	fe_typo_user
Provider	steute Technologies GmbH & Co. KG
Lifetime	Session
Purpose	This cookie is required for the session handling.

Name	om_frontend
Provider	steute Technologies GmbH & Co. KG
Lifetime	Session
Purpose	This cookie is required for the session handling.

Name	PHPSESSID
Provider	steute Technologies GmbH & Co. KG
Lifetime	Session
Purpose	This cookie is required for the session handling.

## 5. THIRD PARTIES

On the basis of our legitimate interests (i.e. interest in the analysis, optimisation and economic efficiency of our online presentation in line with Art. 6 Par. 1 lit. f DSGVO) or on the basis of your given consent in line with Art. 6 Par. 1 lit. a DSGVO, our website includes contents from third-party service providers, e.g. website analyses or the inclusion of specific fonts (hereafter "contents"). The provision of such contents always requires the IP address of the user to be passed on to the third-party provider because the contents could not be sent to the user's browser otherwise. Contents can only be presented on the screen when the IP address is known.

### 5.1. Alugha Video-Player

This website uses the alugha video player, an embedded function from the provider Alugha GmbH, O7, 17, 68161 Mannheim, Germany, for presenting and playing videos (further information at <https://alugha.com>).

In conjunction with this video player, video performance data are captured for diagnosing errors and creating performance reports for website operators. Here Alugha has implemented data protection measures which guarantee the highest degree of data privacy and anonymisation. They include the absence of tracking cookies and fingerprinting, the standardised anonymisation of user IPs, as well as storage of the data exclusively on alugha servers within the European Union. The data captured by alugha during video use are made available to us as the website operator. At no point in time is it possible to assign specific collected information to individual users/viewers. Alugha does not sell or forward these data to third parties. Data are evaluated on the basis of a legitimate interest in accordance with Art. 6 Par. 1 lit. f GDPR, which includes the due and proper provision of our services by alugha. Please click on the following links for data protection information about alugha, including their terms and conditions, as well as their data privacy statement:

- Terms and conditions: <https://alugha.com/tos>
- Data privacy statement: <https://alugha.com/privacy>

Personal data are only processed in compliance with the current legal regulations for data protection. Users can assert their data privacy rights in accordance with the legal regulations at any time.

### 5.2. etracker Analytics

The provider of this website uses the services of etracker GmbH, Hamburg, Germany ([www.etracker.com](http://www.etracker.com)) to analyse usage data. We do not use cookies for web analysis by default. If we use analysis and optimisation cookies, we will obtain your explicit consent separately in advance. If this is the case and you agree, cookies are used to enable a statistical range analysis of this website, a measurement of the success of our online marketing measures and test procedures, e.g. to test and optimise different versions of our online offer or its components. Cookies are small text files that are stored by the Internet browser on the user's device. etracker cookies do not contain any information that could identify a user.

The data generated by etracker on behalf of the provider of this website is processed and stored by etracker solely in Germany by commission of the provider of this website and is thus subject to the strict German and European data protection laws and standards. In this regard, etracker was independently checked, certified and awarded with the ePrivacyseal (<https://www.eprivacy.eu/en/customers/awarded-seals/company/etracker-gmbh/>) data protection seal of approval.

The data processing is based on Art. 6 Section 1 lit f (legitimate interest) of the General Data Protection Regulation (GDPR). Our legitimate interest is the optimisation of our online offer and our website. As the privacy of our visitors is very important to us, the data that may possibly allow a reference to an individual person, such as IP address, registration or device IDs, will be anonymised or pseudonymised as soon as possible. etracker does not use the data for any other purpose, combine it with other data or pass it on to third parties.





You can object to the outlined data processing at any time by clicking on the slider on [www.steute.com/en/data-privacy](http://www.steute.com/en/data-privacy). The objection has no disadvantageous consequences. If no slider is displayed, the data collection is already prevented by other blocking means.

Further information on data protection with etracker can be found [here \(https://www.etracker.com/en/data-privacy/\)](https://www.etracker.com/en/data-privacy/).

### 5.3. Google Ads, Google Conversion Tracking and Google Ads Conversion Tracking

Provided that you have declared your consent, this website uses Google Ads. Google Ads is an online advertising software from Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("Google").

Within the framework of Google Ads, we use so-called conversion tracking. If you click on an ad placed with Google, a cookie is set for conversion tracking. Cookies are small text files which are installed on the internet browser of the user's computer. These cookies become invalid after 30 days and do not identify users personally. If a user accesses a page and clicks on the ad, then provided that the cookie is still valid, Google and we can recognise that a user clicked on the ad and was re-routed to our website.

Within the framework of Google Ads, we use so-called Google Ads (GAds) Call Conversion Tracking. If you click on our displayed telephone number within a Google ad, a call will be placed to a Google forwarding number. Calls are counted as conversions (= successful advertising) once a minimum length of time has elapsed. If a user clicks on our Google ad and then calls one of the Google forwarding numbers displayed on our website, that call will also be counted as a conversion (= successful advertising) once a defined minimum length of time has elapsed.

Every Google Ads customer receives a different cookie, and cookies cannot be traced via the websites of Google Ads customers. The information collected with the help of conversion cookies serves to compile conversion statistics for Google Ads customers who have opted for conversion tracking. Customers can see the total number of users who clicked on their ad and were re-routed to the page marked with a conversion tracking tag. However, they cannot see who those users were.

If you would like to block this tracking process, you can adjust your browser so that it will inform you whenever cookies are about to be installed and will then only permit cookies in certain cases, and/or will exclude cookies in certain cases or in general, and/or will activate an automatic deletion of cookies as soon as the browser is closed. Deactivating cookies may impair the functionality of this website.

"Conversion cookies" are stored in accordance with Art. 6 Par. 1 lit. a DSGVO (= your consent). The website operator has a legitimate interest in the analysis of user behaviour in order to optimise both its website and its advertising.

For more information about Google Ads and Google Conversion Tracking, go to the Google data privacy statement at: <https://www.google.de/policies/privacy/>.

### 5.6 Microsoft (Bing) Ads

Within the framework of our marketing activities, we use Microsoft Advertising from Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA. This service helps us to draw the attention of companies to the high quality of our products. If you reach our website via a Microsoft Bing ad, a cookie will be stored on your computer by Microsoft Bing Ads. This informs Microsoft Bing and us about the fact that somebody has clicked on an advertisement, has been forwarded to our website and has accessed a pre-determined target page (conversion page). We only know the total number of users who have clicked on a Bing ad and have then been forwarded to our conversion page. We do not know any personal information about the identity of these users.

### Microsoft and processing



You can find further information about data privacy and the cookies used by Microsoft and Bing Ads (Microsoft Advertising) by visiting the Microsoft website: <https://privacy.microsoft.com/de-de/privacystatement> and <https://about.ads.microsoft.com/de-de/policies/legal-privacy-and-security#privacy-and-data-protection-policies>

If you are not in agreement with Microsoft being able to process information about your surfing behaviour as laid out above, you can object to the setting of cookies for this purpose – for example using the browser setting which fundamentally deactivates the setting of cookies. Moreover, you can prevent the capturing of data generated by the cookie and relating to your use of the website, as well as processing of these data by Microsoft, by withdrawing your consent. To do this, click on the following link: <https://account.microsoft.com/privacy/ad-settings/signedout?lang=de-DE>.

### What is the legal basis for processing?

If you have consented to use of Microsoft Bing Ads (otherwise known as Microsoft Advertising), then this consent constitutes the legal basis (Art. 6 Par. 1 lit. a GDPR) for processing of your personal data.

### How long will we store your data?

Once their purpose has been served, we will delete all data received from you via Microsoft unless we are legally obliged to retain the data for longer, or still require the data for the execution or completion of an existing contractual agreement, or still require the data as evidence. In such cases we delete the corresponding data once the legal retention period has expired or as soon as we no longer require the data for the execution or completion of an existing contractual agreement, or as evidence. We have no information about the Microsoft policy for deleting personal data.

## 5.7 Lead Gen Forms at LinkedIn

We use Lead Gen Forms from LinkedIn for the purposes of customer acquisition. These forms are a type of advertising used in social media networks which enable contact forms to be integrated in sponsored content.

Using this service within the framework of customer acquisition means that interested parties have a quick and easy way of forwarding their email address and other user information to us. Specifically: first name, surname, email address, professional title and company name.

This functionality enables us to target interested parties more accurately.

### LinkedIn and processing

If you are a member of LinkedIn, this platform can match call-up of the abovementioned data to your registered user profile. Please click on the following link for further information from LinkedIn about data privacy and Lead Gen Ads: <https://www.linkedin.com/legal/privacy-policy> and/or <https://business.linkedin.com/de-de/marketing-solutions/native-advertising/lead-gen-ads>

You can optionally disable this function for the future by setting an opt-out cookie: <https://www.linkedin.com/pset-tings/guest-controls/retargeting-opt-out>.

### What is the legal basis for processing?

The legal basis for using the Lead Ads Tool is Art. 6 Par. 1 lit. f GDPR. Our legitimate interest for using this tool is the conducting of marketing activities aimed at initiating new business.



## How long will we store your data?

Once their purpose has been served, we will delete all data transferred via Lead Gen Forms unless we are legally obliged to retain the data for longer, or still require the data for the execution or completion of an existing contractual agreement, or still require the data as evidence. In such cases we delete the corresponding data once the legal retention period has expired or as soon as we no longer require the data for the execution or completion of an existing contractual agreement, or as evidence. We have no information about the LinkedIn policy for deleting personal data.

## 6. WHAT ARE MY RIGHTS?

### 6.1. Your rights

As a party affected by data processing, the DSGVO affords you various rights (in the following collectively referred to as the "rights of affected parties") which include:

### 6.2. Right to know (acc. to Art. 15 DSGVO)

Acc. to Art. 15 DSGVO you have the right to **information** about storage of your personal data, including any recipients of that data and the planned duration of storage. Should any incorrect personal data be processed, you have the right acc. to Art. 16 DSGVO to **correction** of that data. Within the legal provisions you can request **deletion** of your data or **restriction** of data processing (Art. 17 and 18 DSGVO), as well as to **object** to data processing (Art. 21 DSGVO) and you have the right to **data portability** (Art. 20 DSGVO). If processing is based on consent (Art. 6 Par. 1 lit. a or Art. 9 Par. 2 lit. a DSGVO), you can **withdraw** your consent at any time and with future effect. If you believe that processing of your personal data violates data privacy law, then you have the right to lodge a **complaint** with a supervisory authority in accordance with Art. 77 Par. 1 DSGVO.

### 6.3. Exertion of rights as an affected party

In order to exert your rights as an affected party, please apply to the bodies named in Section 3. Requests submitted electronically will generally be replied to electronically. The information, correspondence and measures which we must provide and take acc. to DSGVO, including those pertaining to the exertion of rights as an affected party, are fundamentally free of charge. Only in cases where requests are obviously unjustified or excessive are we permitted to levy an appropriate charge for our administrative costs, or to refuse to comply with the request (acc. to Art. 12 Par. 5 DSGVO).

If legitimate doubts exist about your identity, we are permitted to demand additional information from you for identification purposes. If it is not possible for us to identify you, we have the right to refuse to comply with your request. We shall inform you separately should identification prove impossible – provided it is within our power to do so (see Art. 12 Par. 6 and Art. 11 DSGVO).

Requests for disclosures and information will usually be managed immediately, at the latest within one month after receipt of the request. This period can be extended by a further two months if necessary due to the complexity and/or number of requests; in the event of a delay, we will inform you of this and give reasons for the delay, at the latest within one month of receiving your request. If we should fail to comply with a request, we will inform you of the reasons for this immediately, at the latest one month after receiving the request, as well as inform you about your options regarding a complaint to a regulatory body and/or the claiming of legal aid (see Art. 12 Par. 3 and Par. 4 DSGVO).

Please note that you can only exert your rights as an affected party within the framework of restrictions and limitations stipulated by the European Union or its member states (Art. 23 DSGVO)



#### 6.4. Must I grant access to my data?

In order for us to fulfil the conditions laid out in Section 4.1, it is necessary that you grant us access to your personal data.

In order to finalise and implement a contract with you, it is crucial for us and also a legal requirement. If you do not grant us access to your data, we cannot enter into a contract with you.

Should you have a complaint, you can apply to the appropriate regulatory body at any time. The regulatory body named in Section 3.3. is responsible for our company.

You have the right to go to court against a regulatory body acc. to Art. 78 DSGVO, and against our company acc. to Art. 79 DSGVO.

#### 6.5. Automated decision-making/ profiling

We perform no automated decision-making or profiling.