

## Information on processing of personal data

RLE INTERNATIONAL is committed to treat your personal data securely and confidentially.

With the following information we would like to give you an overview of the processing of your personal data by us and your rights in this regard. What data is being processed in detail and how it is used, depends largely on the requested or agreed services or on the association with RLE. Therefore, not all parts of this information will apply to you.

This information applies to all persons associated with RLE.

### Who is responsible for the data processing and whom can I contact?

In terms of the EU General Data Protection Regulation (GDPR) and other national data protection laws of the member states as well as other data protection regulations, the responsible body is:

RLE INTERNATIONAL Produktentwicklungsgesellschaft mbH (Holding)  
Brodhausen 1  
51491 Overath  
Germany  
Telephone: +49 (221) 8886-0  
Legal representative: Ralf Laufenberg  
E-Mail: [info@rle.de](mailto:info@rle.de)  
Website: [www.rle.international](http://www.rle.international)

You can contact our company data protection officer at:

RLE INTERNATIONAL Produktentwicklungsgesellschaft mbH  
- Data Protection Officer -  
Robert-Bosch-Strasse 10  
50769 Köln  
Germany  
Telephone: +49 (221) 8886-0  
E-Mail: [datenschutz@rle.de](mailto:datenschutz@rle.de)

### Which sources and what data do we use?

We process personal data that we receive, for example, in the course of the job application process, in the processing of your contract or other contractual agreements, or in our business relationship with data subjects. In addition, to the extent necessary for the provision of our services, we process personal data which we may obtain from publicly accessible sources (e.g. commercial and association registers, press, Internet) or which are legitimately transmitted to us by other companies of the RLE Group or by other third parties (e.g. a credit agency).

Relevant kinds of personal data are personal details (name, address and other contact data, date and place of birth and nationality), identification data (e.g. passport data) and authentication data. In addition, these may also include commission data (e.g. payment order), data from the fulfilment of our contractual obligations (e.g. sales data in payment transactions), credit-relevant data (e.g. revenue and expenses), marketing and sales data, documentation data (e.g. meeting minutes or evidence), application data, data from other contracts and other data comparable to the categories mentioned.

## **Why do we process your data (purpose of processing) and on what legal principles is the processing based on?**

We process personal data in accordance with the provisions of the European Union General Data Protection Regulation (GDPR) and the Federal Data Protection Act ('Bundesdatenschutzgesetz', BDSG):

### a. to fulfil contractual obligations (Art. 6 para. 1 b GDPR)

Data Processing is used for the execution and procurement of transactions and services in the context of the fulfilment of contracts with our customers or for the execution of pre-contractual activities which take place on request. The purposes of data processing are primarily aimed at specific services which may include product development, research, planning as well as service, support and development-related services and management consultancy, especially within the automotive industry. Further details on data processing purposes can be found in the relevant contractual documents and our general terms and conditions.

### b. relying on legitimate interests (Art. 6 para. 1 f GDPR)

If necessary, we process your data beyond the actual contractual performance to pursue our, or a third party's legitimate interests.

For example:

- Initiation and intensification of business relations with existing and potential customers (general marketing campaigns, contact data exchange by telephone, e-mail, business cards, etc.)
- Enforcement of legal claims and defence in legal disputes,
- Ensuring IT security and IT functionality of the organization,
- Prevention and investigation of criminal offences,
- Video surveillance for the protection of the domestic authority, for the collection of evidence in robberies and fraud offences (cf. also § 4 BDSG),
- Preventive measures for building and system security (e.g. access control),
- Measures to secure the domestic authority,
- Measures for business management and further development of services and products,
- Risk management in the RLE Group.

### c. on account of your consent (Art. 6 para. 1 a GDPR)

If you have given us your consent to process personal data for specific purposes (e.g. distribution of data processed in the application process within the RLE Group or to third parties), the lawful nature of such processing is given on the basis of your consent. A given consent can be revoked at any time. This also applies to the revocation of declarations of consent which were given to us before the GDPR, i.e. before 25 May 2018. The revocation of a consent is only effective for the future and does not affect the legality of the data processed until revocation.

### d. on the basis of legal requirements (Art. 6 para. 1 c GDPR) or in the public interest (Art. 6 para. 1 e GDPR)

As a company, we are also subject to various other statutory obligations, i.e. legal requirements (e.g. tax laws). The purposes of processing include the fulfilment of tax control and reporting obligations as well as the assessment and control of risks within the group.

## Who receives my data?

Within the company, those departments will have access to your data who require them in order to fulfil our contractual and legal obligations. Service providers and agents employed by us may also receive data for these purposes if they are specifically bound to secrecy and confidentiality. These are mainly companies in the categories of IT services, logistics, telecommunications, consulting as well as sales and marketing.

With regard to the passing-on of data to recipients outside our organisation, it must first be noted that we only pass on information about our customers and partners if this is required by law, if the customer or partner has consented or if we are authorised to provide information. Under these conditions, recipients of personal data can be, for example:

- public authorities and institutions (e.g. tax authorities, law enforcement authorities, family courts, land registries) in the event of a legal or official obligation,
- other companies or comparable institutions to which we transfer personal data in order to conduct the business relationship with you (e.g. service providers, credit agencies, insurance companies, trustees, depending on the contract),
- other companies within the RLE Group for risk management due to legal or official obligations,
- service providers that we use within the framework of order processing relationships.

Other recipients of data may be those bodies for which you have given us your consent to the transfer of data or to which we are authorised to transfer personal data on the basis of a consideration of legitimate interests.

## Is data being transferred to a third country or to an international organisation?

Data is being transmitted to offices in countries outside the European Union (so-called third countries) if

- it is necessary for the performance of the contracts or services
- it is required by law (e.g. tax reporting obligations) or
- you have given us your consent.

Furthermore, it is proposed to transfer data to bodies in third countries in the following cases:

- If necessary in individual cases, your personal data may be transferred to an IT service provider in the USA or another third country to ensure the IT operations of RLE in compliance with the European data protection level.
- With the consent of the person concerned or on the basis of legal regulations for fighting criminal acts as well as in the context of relying on legitimate interests, personal data (e.g. legitimisation data) may in individual cases be transmitted under observance of the data protection level of the European Union.

## For how long will my data be stored?

We process and store your personal data as long as this is necessary for the fulfilment of our contractual and legal obligations.

If the data is no longer required for the fulfilment of contractual or legal obligations, it is being regularly deleted, unless its - limited - further processing is necessary for the following purposes:

- Fulfilment of commercial and tax storage obligations, e.g. those arising from the German Commercial Code (HGB). The periods for storage and documentation specified there, are generally two to ten years.
- Preservation of evidence within the framework of the statutory limitation periods. According to §§ 195 ff of the German Civil Code (BGB), these limitation periods can be up to 30 years, whereas the regular limitation period is 3 years.

## What data protection rights do I have?

Any data subject has the right of access under Article 15 GDPR, the right to rectification under Article 16 GDPR, the right to erasure under Article 17 GDPR, the right to restriction of processing under Article 18 GDPR, the right to object under Article 21 GDPR and the right to data portability under Article 20 GDPR. The right of access and the right to erasure are subject to the restrictions of §§ 34 and 35 BDSG. In addition, there is a right to lodge a complaint with the responsible data protection supervisory authority (Article 77 GDPR in conjunction with § 19 BDSG).

You can revoke your consent to the processing of personal data at any time. This also applies to the revocation of declarations of consent which were given to us before the GDPR, i.e. before 25 May 2018. Please note that the revocation will only take effect in the future. Processing that took place before the revocation is not affected by this.

## Am I obliged to provide data?

Within the framework of our business relationship, you must provide those personal data which are required to establish, maintain and terminate a business relationship and to fulfill the associated contractual obligations or those to the collection of which we are legally obliged to collect. Without this information, we will usually not be able to make, fulfill and terminate a contract with you.

## Is there any automated decision making?

Generally, we do not use fully automated decision making as per Article 22 GDPR to establish and carry out the business relationship. In the event that we use these procedures in individual cases, we will inform you separately about this and about your rights in this regard, insofar as this is prescribed by law.

## Is there any profiling?

We process some of your data automatically with the aim of evaluating certain personal aspects (profiling).

For example, we use profiling in the following cases:

- Due to legal and regulatory requirements, we are obliged to fight money laundering, terrorist financing and transfer of funds. Data evaluations are also carried out in this regard. These precautions also serve your safety.

RLE INTERNATIONAL  
The Data Protection Officer