

## 1. Introduction

We would like to use the information below to provide you "data subject" with an overview of our processing of your personal data and your rights under data protection law. It is generally possible to use our website without entering personal data. However, if you wish to make use of special services offered by our company through our website, it may be necessary to process personal data. If it is necessary to process personal data and there is no legal basis for such processing, we will generally obtain your consent.

Personal data, such as your name, address or email address, is always processed in accordance with the EU General Data Protection Regulation (GDPR) and in accordance with the country-specific data protection regulations applicable to the "RHODIUS Abrasives GmbH". The aim of this Privacy Notice is to inform you about the scope and purpose of the personal data we collect, use and process.

As the data controller, we have implemented numerous technical and organisational measures to ensure the most complete possible protection of the personal data processed via this website. Nevertheless, Internet-based data transmissions can in principle have security gaps so that absolute protection cannot be guaranteed. For this reason, you are free to submit personal data on alternative ways, such as by phone or by post to us.

## 2. Data controller

The data controller, as defined by the GDPR, is:

RHODIUS Abrasives GmbH  
Brohltalstr. 2, 56659 Burgbrohl, Germany  
Phone: +49 2636 96910-2400  
E-mail: [service@rhodius.eu](mailto:service@rhodius.eu)

Data controller's representative:

## 3. Data protection officer

You can contact our data protection officer by post at the above address, marked for the attention of the data protection officer.

E-mail: [dalenschutz@rhodius.eu](mailto:dalenschutz@rhodius.eu)

You may contact our data protection officer directly at any time if you have any questions or suggestions regarding data protection.

## 4. Definitions

This Privacy Notice is based on the terminology used by the European legislature and legislature in the adoption of the General Data Protection Regulation (GDPR). Our privacy policy should be easy to read and understand, both for the public and for our customers and business partners. To ensure this, we would like to explain in advance the terminology used. Among other things, we use the following terms in this privacy policy.

We use the following terms in this Privacy Notice, among others:

### 1. Personal data

Personal data means any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

### 2. Data subject

A Data subject is any identified or identifiable natural person whose personal data is processed by the controller (our company).

### 3. Processing

Processing is any operation or set of operations which is performed upon personal data, whether or not by automatic means, such as collection, recording, organisation, filing, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### 4. Restriction of processing

Restriction of processing is the marking of stored personal data with the aim of limiting their future processing.

### 5. Profiling

Profiling is any form of automated processing of personal data which consists in using such personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects relating to that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or change of location.

### 6. Pseudonymisation

Pseudonymisation is the processing of personal data in such a way that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures which ensure that the personal data cannot be attributed to an identified or identifiable natural person.

### 7. Data processor

Data processor means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

## 8. Recipient

A recipient is a natural or legal person, public authority, agency, or other body to whom personal data are disclosed, whether a third party or not. However, public authorities that may receive personal data in the context of a specific investigative task under Union or Member State law shall not be considered as recipients.

## 9. Third party

Third party means any natural or legal person, public authority, agency or body other than the data subject, the controller, the processor and the persons who, under the direct responsibility of the controller or the processor, are authorised to process the personal data.

## 10. Consent

Consent means any freely given specific and informed indication of the data subject's wishes in the form of a statement or other unambiguous affirmative act by which the data subject signifies his or her agreement to the processing of personal data relating to him or her.

## 5. Legal basis for processing

Art. 6 (1) lit. a) GDPR (icw § 25 (1) Telecommunications Digital Services Data Protection Act (TDDDG) (formerly TTDSG)) serves our company as the legal basis for processing operations where we obtain consent for a specific processing purpose.

If the processing of personal data is necessary for the performance of a contract to which you are a party, as is the case, for example, with processing operations that are necessary for the delivery of goods or the provision of another service or consideration, the processing is based on Art. 6 (1) lit. b) GDPR. The same applies to processing operations that are necessary for the implementation of pre-contractual measures, for example in the case of enquiries about our products or services.

If our company is subject to a legal obligation by which the processing of personal data becomes necessary, such as for the fulfilment of tax obligations, the processing is based on Art. 6 (1) lit. c) GDPR.

In rare cases, the processing of personal data might become necessary to protect vital interests of the data subject or another natural person. This would be the case, for example, if a visitor were to be injured on our premises and as a result their name, age, health insurance data or other vital information had to be passed on to a doctor, hospital or other third party. In this case, the processing would be based on Art. 6 (1) lit. d) GDPR.

Finally, processing operations could be based on Art. 6 (1) lit. f) GDPR. Processing operations which are not covered by any of the aforementioned legal bases are based on this legal basis if the processing is necessary for the protection of a legitimate interest of our company or a third party, provided that the interests, fundamental rights and freedoms of the data subject do not outweigh. We are permitted to carry out such processing operations in particular because they have been specifically mentioned by the European law. In this respect, the legislature took the view that a legitimate interest could be assumed if you are a customer of our company (Recital 47, Sentence 2 GDPR).

## 6. Technology

### 6.1 SSL/TLS-encryption

This site uses SSL or TLS encryption to guarantee the security of data processing and to protect the transmission of confidential content, such as orders, login data or contact enquiries that you send to us as the operator. You can recognise an encrypted connection by the fact that the address bar of the browser contains a "https://" instead of a "http://" and by the lock symbol in your browser bar.

We use this technology to protect your transmitted data.

### 6.2 Data collection when visiting the website

If you only use our website for informational purposes, if you do not register or otherwise provide us with information or do not give your consent to processing that requires consent, we only collect data that is technically necessary for the provision of the service. This is regularly data that your browser transmits to our server (in so-called "server log files"). Our website collects a series of general data and information each time you or an automated system accesses a page. This general data and information is stored in the server log files. The following can be recorded:

1. browser types and versions used,
2. the operating system used by the accessing system,
3. the website from which an accessing system accesses our website (so-called referrer),
4. the sub-pages accessed via an accessing system on our website,
5. the date and time of access to the website,
6. an abbreviated internet protocol address (anonymised IP address) and,
7. the Internet service provider of the accessing system.

When using this general data and information, we do not draw any conclusions about your person. This information is rather required to:

1. deliver the contents of our website correctly,
2. optimise the contents of our website as well as to advertise it,
3. ensure the permanent operability of our IT systems and the technology of our website, and
4. provide law enforcement authorities with the information necessary to prosecute in the event of a cyber-attack.

This collected data and information is therefore statistically analysed and further analysed by us with the aim of increasing data protection and data security within our company to ultimately ensure an optimum level of protection for the personal data being processed by us. The anonymous data from the server log files is stored separately from all personal data provided by a data subject.

The legal basis for data processing is Art. 6 (1) lit. f) GDPR. Our legitimate interest follows from the purposes for data collection listed above.

### 6.3 Encrypted payment transactions

If, after concluding a paid contract, there is an obligation to provide us with your payment data (e.g. the account number when granting direct debit authorisation), this data is required for the processing of payments.

Payment transactions via the common means of payment (Visa/MasterCard or direct debit) are made exclusively via an encrypted SSL or TLS connection. You can recognise an encrypted connection by the fact that the address bar of the browser contains a "https://" instead of a "http://" and by the lock symbol in your browser bar.

We use this technology to protect your transmitted data.

### 6.4 Hosting by Mittwald

We host our website at Mittwald CM Service GmbH & Co. KG, Königsberger Straße 4-6, 32339 Espelkamp (hereafter referred to as Mittwald).

When visiting our website your personal data (e.g. IP addresses in log files) are processed on the servers of Mittwald.

The use of Mittwald is based on Art. 6 (1) lit. f) GDPR. Our legitimate interest is the high-performance provision of our website.

We have concluded a corresponding agreement with Mittwald on the basis of GDPR for commissioned processing. This is a contract required by data protection law, which ensures that Mittwald only processes the personal data of our website visitors according to our instructions and in compliance with the GDPR.

Additional information and Mittwald's privacy policy can be found at <https://www.mittwald.de/datenschutz>

## 7. Cookies

### 7.1 General information about cookies

We use cookies on our website. Cookies are small files that are automatically created by your browser and stored on your IT system (laptop, tablet, smartphone or similar) when you visit our website.

Information generated from the specific device used is stored in cookies. This does not mean, however, that we will gain immediate knowledge of your identity.

The use of cookies helps us make it more convenient for you to use our website. For example, we use session cookies to detect whether you have already visited individual pages on our website. These are erased automatically when you leave our website.

In addition, we also use temporary cookies to optimise user-friendliness, which are stored on your end device for a specific period of time. If you visit our site again to use our services, it is automatically recognised that you have already been with us and which entries and settings you have made so that you do not have to enter them again.

We also use cookies to statistically record the use of our website and to evaluate our offer for you for the purpose of optimisation. These cookies enable us to automatically recognise that you have already visited our website when you visit it again. The cookies set in this way are automatically deleted after a defined period of time. The respective storage period of the cookies can be found in the settings of the consent tool used.

### 7.2 Legal basis for the use of cookies

The data processed by the cookies, which are required for the proper functioning of the website, are thus necessary to protect our legitimate interests as well as those of third parties in accordance with Art. 6 (1) lit. f) GDPR.

For all other cookies, the following applies: You have given your consent to this within the meaning of Art. 6 (1) lit. a) GDPR via our opt-in cookie banner.

### 7.3 Tips for avoiding cookies in common browsers

You can delete cookies, allow only selected cookies or completely deactivate cookies at any time via the settings of the browser you are using. You can find more information on the support pages of the respective providers:

Chrome:  
<https://support.google.com/chrome/answer/95647?tid=311178978>.

Safari:  
<https://support.apple.com/de-at/guide/safari/sfri11471/mac?tid=311178978>.

Firefox:  
<https://support.mozilla.org/de/kb/cookies-und-website-daten-in-firefox-loschen?tid=311178978>.

Microsoft Edge:  
<https://support.microsoft.com/de-de/microsoft-edge/cookies-in-microsoft-edge-%3C3%B6schen-63947406-40ac-3b8-57b9-2a946a29ae09>

### 7.4 Cookiebot (Consent Management Tool)

We use the Consent Management Tool "Cookiebot" of Cybot A/S, Havnegade 39, 1058 Copenhagen, Denmark. This service allows us to obtain and manage the consent of website users for data processing.

Cookiebot collects data generated by end users who use our website. When an end user gives consent via the cookie consent tool, Cookiebot automatically logs the following data:

- The IP number of the end user in anonymised form (the last three digits are set to 0),
- Date and time of consent,
- User agent of the end user's browser,
- The URL from which the consent was sent,
- An anonymous, random and encrypted key,
- The consent status of the end user, which serves as proof of consent.

The key and consent status are also stored in the end-user's browser in the cookie "CookieConsent" so that the website can automatically read and follow the end-user's consent in all subsequent page requests and future end-user sessions for up to 12 months. The key is used for proof of consent and for an option to check that the consent status stored in the end-user's browser is unchanged from the original consent submitted to Cybot.

The functionality of the website is not guaranteed without the processing. The "CookieConsent" cookie set by Cookiebot is classified as necessary. There is no possibility for the user to object as long as there is a legal obligation to obtain the user's consent to certain data processing operations (Art. 7 (1), 6 (1) lit. c) GDPR).

Cybot is a recipient of your personal data and acts as a processor for us.

Additional information on the service can be found at the following link: <https://www.cookiebot.com/de/privacy-policy/>.

## 8. Contents of our website

### 8.1 Registration as a user

You have the option of registering on our website by providing personal data.

Which personal data is transmitted to us in this process can be seen from the respective input mask used for registration. The personal data you enter is collected and stored exclusively for internal use by us and for our own purposes. We may arrange for data to be passed on to one or more data processors, for example a parcel service provider, who will also use the personal data exclusively for an internal use attributable to us.

By registering on our website, the IP address assigned by your internet service provider (ISP), the date and the time of registration are also stored. This is done only for the purpose of preventing our services from being misused. If necessary, this data may be used to clarify the situation surrounding any crimes committed. In this respect, the storage of this data is necessary for our protection. As a matter of principle, this data is not disclosed to third parties. This does not apply if we are legally obliged to pass on the data or if the data is passed on for the purpose of criminal prosecution.

Your registration, including voluntary provision of personal data, also serves us to offer you content or services which, due to the nature of the matter, can only be offered to registered users. Registered persons are free to change the personal data provided during registration at any time or to have it completely erased from our database.

Upon request, we will provide you at any time with information about which personal data is stored about you. Furthermore, we will correct or delete personal data at your request, insofar as this does not conflict with any statutory retention obligations. A data protection officer named in this Privacy Policy and all other employees are available to the data subject as contact persons in this context.

The processing of your data is in the interest of a convenient and easy use of our website. This constitutes a legitimate interest within the meaning of Art. 6 (1) lit. f) GDPR.

### 8.2 Data processing when opening a customer account and for contract execution

Pursuant to Art. 6 (1) lit. b) GDPR, personal data is collected and processed if you provide it to us for the execution of a contract or when opening a customer account. Which data is collected can be seen from the respective input forms. Deletion of your customer account is possible at any time and can be done by sending a message to the above address of the person responsible. We store and use the data provided by you for the purpose of processing the contract. After complete execution of the contract or deletion of your customer account, your data will be blocked taking into account tax and commercial law retention periods and deleted after expiry of these periods, unless you have expressly consented to further use of your data or we are legally permitted to the further use of your data, about which we inform you accordingly below.

### 8.3 Data processing for order handling

The personal data collected by us will be passed on to the transport company commissioned with the delivery as part of the contract execution, insofar as this is necessary for the delivery of the goods. We disclose your payment data to the commissioned credit institution within the scope of payment processing, insofar as this is necessary for payment processing. If payment service providers are used, we will explicitly inform you about this below. The legal basis for the transfer of data is Art. 6 (1) lit. b) GDPR.

### 8.4 Data processing for identity verification

Where necessary, we verify your identity on the legal basis of Art. 6 (1) lit. b) and f) GDPR by using information from service providers. The authorisation to do so results from the protection of your identity and the prevention of fraud attempts at our expense. The circumstance and the result of our enquiry will be stored in your customer account or your guest account for the duration of the contractual relationship.

## 8.5 Conclusion of contracts with online shop, trader and dispatch of goods

We only transmit personal data to third parties if this is necessary within the scope of the data protection agreement, for example to the companies entrusted with the delivery of the goods or to the credit institution entrusted with the payment processing. Further transmission of data does not take place or only if you have expressly consented to the transmission. Your data will not be passed on to third parties without your express consent, for example for advertising purposes.

The basis for data processing is Art. 6 (1) lit. b) GDPR, which permits the processing of data for the fulfilment of contracts or pre-contractual measures.

## 8.6 Contact support / Contact form

Personal data is collected when contacting us (e.g. via contact form or e-mail). Which data is collected in the case of the use of a contact form can be seen from the respective contact form. This data is stored and used exclusively for the purpose of answering your request or for contacting you and the associated technical administration. The legal basis for processing the data is our legitimate interest in responding to your request in accordance with Art. 6 (1) lit. f) GDPR. If your contact is aimed at concluding a contract, the additional legal basis for processing is Art. 6 (1) lit. b) GDPR. Your data will be deleted after final processing of your request; this is the case if it can be inferred from the circumstances that the matter concerned has been conclusively clarified and the deletion does not conflict with any legal obligations to retain data.

## 8.7 Application Management / job exchange

We collect and process the personal data of applicants for the purpose of processing the application procedure. The processing may also take place electronically. This is particularly the case if an applicant submits the relevant application documents to us electronically, for example by e-mail or via a web form on the website. If we conclude an employment or service contract with an applicant, the transmitted data will be stored for the purpose of processing the employment relationship in compliance with the statutory provisions. If we do not conclude a contract with the applicant, the application documents are automatically deleted two months after notification of the rejection decision, provided that no other legitimate interests on our part oppose deletion. Another legitimate interest in this sense is, for example, a duty to provide evidence in proceedings under the German Equal Treatment Act [Allgemeines Gleichbehandlungsgesetz [AGG]].

The legal basis for processing your data is Art. 6 (1) lit. b) GDPR, Art. 88 GDPR i.c.w. § 26 (1) German Federal Data Protection Act [Bundesdatenschutzgesetz [BDSG]].

## 9. Visitors

### 9.1 Purposes of processing:

Visitor registration is required for the AEO-S certification. Unregistered visitors are not allowed in the administrative building or on the production site. Visitors are checked against the sanctions lists by the overnight job. This means that visitors need to be registered on the visitor list no later than the day before they visit. Visitors are added to the evacuation list on the day of their visit so that everyone can be evacuated in the event of a fire or chemical accident. Visitors are removed from the evacuation list after they sign out at reception and leave the premises.

### 9.2 Legal basis of processing:

The processing is necessary to comply with a legal obligation according to Article 6 (1) (c) GDPR (safeguarding the security of processing according to Article 32 GDPR).

- Regulation (EC) No 2580/2001
- Regulation (EC) No 881/2001
- Regulation (EC) No 753/2011.

## 10. Newsletters

### 10.1 Newsletter for regular customers (without registration)

If you have provided us with your email address when purchasing goods or services, we may periodically email you offers for similar goods or services to those you have already purchased from our range. In accordance with § 7 (3) of the German Unfair Competition Act (Gesetz gegen den unlauteren Wettbewerb, UWG), we do not need to obtain your separate consent for this. In this respect, the data processing is carried out solely on the basis of our legitimate interest in personalized direct advertising in accordance with Art. 6 (1) lit. f) GDPR. If you have initially objected to the use of your e-mail address for this purpose, no e-mails will be sent by us. You are entitled to object to the use of your e-mail address for the aforementioned advertising purpose at any time with effect for the future by notifying the responsible person named at the beginning. For this, you will only incur transmission costs according to the prime rates. Upon receipt of your objection, the use of your e-mail address for advertising purposes will cease immediately.

### 10.2 Marketing newsletter (double opt-in)

On our website you are given the opportunity to subscribe to our company newsletter. What personal data is transmitted to us when ordering the newsletter, is determined by the input mask used for this purpose.

We use our newsletter to regularly communicate our offers to our customers and business partners. You can, therefore, only receive our company's newsletter if

1. You have a valid e-mail address and
2. You have registered for newsletter delivery.

For legal reasons, a confirmation e-mail will be sent to the e-mail address that you entered for the first time for the newsletter dispatch using the double opt-in procedure. This confirmation e-mail is used to verify that you, as the owner of the e-mail address, have authorized the receipt of the newsletter.

When you register for the newsletter, we also store the IP address assigned by your Internet service provider (ISP) of the IT system used by you at the time of registration, as well as the date and time of registration. The collection of this data is necessary in order to be able to trace the (possible) misuse of your e-mail address at a later date and therefore serves our legal protection.

The personal data collected in the context of a registration for the newsletter will be used exclusively for sending our newsletter. Furthermore, subscribers to the newsletter could be informed by e-mail if this is necessary for the operation of the newsletter service or a related registration, as could be the case in the event of changes to the newsletter offer or changes in technical circumstances. No personal data collected as part of the newsletter service will be passed on to third parties. The subscription to our newsletter can be cancelled by you at any time. The consent to the storage of personal data that you have given us for the newsletter dispatch can be revoked at any time. For the purpose of revoking the consent, you will find a corresponding link in each newsletter. Furthermore, it is also possible to unsubscribe from the newsletter mailing directly on our website at any time or to inform us of this in another way.

The legal basis for data processing for the purpose of sending newsletters is Art. 6 (1) lit. a) GDPR.

## 11. Our activities in social networks

To allow us to communicate with you on social networks and inform you about our services, we run our own pages on these social networks. If you visit one of our social media pages, we and the provider of the social media network are joint controllers (Art. 26 GDPR) regarding to the processing operations triggered thereby, which concern personal data.

We are not the original provider of these pages, but only use them within the scope of the options offered to us by the respective providers

We would therefore like to point out as a precautionary measure that your data may also be processed outside of the European Union or the European Economic Area. Use of these networks may therefore involve data protection risks for you since the protection of your rights may be difficult, e.g. your rights to information, erasure, objection, etc. Processing on social networks frequently takes place directly for advertising purposes or for the analysis of user behaviour by network providers, and we have no control over this. If the provider creates user profiles, cookies are often used or user behaviour may be assigned directly to your own member profile on the respective social network (if you are logged in).

The processing operations of personal data described are carried out in accordance with Art. 6 (1) lit. f) GDPR on the basis of our legitimate interests and the legitimate interests of the respective provider in order to communicate with you in a timely manner or to inform you about our services. If you have to grant your consent to the respective providers to process your data as a user, the legal basis for this processing is Art. 6 (1) lit. a) GDPR in conjunction with Art. 7 GDPR.

Since we have no access to these providers' databases, we would like to point out that you would be best placed to exercise your rights (e.g. to information, rectification, erasure, etc.) directly with the respective provider. More information on the processing of your data on social networks and your options for exercising your right to object or your right of revocation (opt out) is listed below for each of the social network providers we use:

### 11.1 Facebook

(Joint) Data controller responsible for data processing in Europe:

Meta Platforms Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

Privacy Notice (Data Policy):

<https://www.facebook.com/about/privacy>

### 11.2 Instagram

(Joint) Data controller responsible for data processing in Europe:

Meta Platforms Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland

Privacy Notice (Data Policy):

<http://instagram.com/legal/privacy/>

Opt-out and advertising settings:

[https://www.instagram.com/accounts/privacy\\_and\\_security/](https://www.instagram.com/accounts/privacy_and_security/)

### 11.3 LinkedIn

(Joint) Data controller responsible for data processing in Europe:

LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland

Privacy Notice:

<https://www.linkedin.com/legal/privacypolicy>

### 11.4 YouTube

(Joint) Controller responsible for data processing in Europe:

Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland

Privacy Notice:

<https://policies.google.com/privacy>

## 12. Social media plugins

### 12.1 YouTube Plugin

We have integrated YouTube components on this website. YouTube is an Internet video portal that allows video publishers to post video clips free of charge and other users to view, rate and comment on them free of charge. YouTube allows the publication of all types of videos, which is why complete film and television programmes, but also music videos, trailers or videos made by users themselves can be accessed via the Internet portal.

The operating company of YouTube is YouTube, LLC, 901 Cherry Ave, San Bruno, CA 94066, USA. YouTube, LLC is a subsidiary of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

Each time you call up one of the individual pages of this website that is operated by us and on which a YouTube component (YouTube plugin) has been integrated, the internet browser on your IT system is automatically prompted by the respective YouTube component to download a representation of the corresponding YouTube component from YouTube. Further information on YouTube can be found at <https://www.youtube.com/yt/about/de/>. Within the scope of this technical procedure, YouTube and Google receive information about which specific sub-page of our website is visited by you.

If you are logged in to YouTube at the same time, YouTube recognises which specific sub-page of our website you are visiting when you call up a sub-page that contains a YouTube plugin. This information is collected by YouTube and Google and assigned to your YouTube account.

YouTube and Google always receive information via the YouTube component that you have visited our website if you are logged into YouTube at the same time as calling up our website; this takes place regardless of whether you click on a YouTube video or not. If you do not want this information to be transmitted to YouTube and Google, you can prevent the transmission by logging out of your YouTube account before accessing our website.

The parent company Google LLC is certified as a US company under the EU-US Data Privacy Framework. There is hereby an adequacy decision pursuant to Art. 45 GDPR, so that a transfer of personal data may also take place without further guarantees or additional measures.

Personal data is only processed via social media buttons after your express consent in accordance with Art. 6 (1) lit. a) GDPR.

YouTube's applicable privacy policy can be found at

<https://www.google.de/intl/de/policies/privacy/>.

## 13. Web analytics

### 13.1 LinkedIn Pixel (Insight Tag)

This website uses LinkedIn Insights from LinkedIn Corporation, 1000 W Maude Ave Sunnyvale, CA 94085, USA (LinkedIn). If you give your express consent, this can be used to track the behavior of users.

If you click on one of our ads on LinkedIn, your referral and the actions on our website will be tracked. If you visit our website without an ad link, you may be shown further ads for our products on LinkedIn. The procedure is used to evaluate the effectiveness of the advertisements for statistical and market research purposes and can help to optimize future advertising measures. The LinkedIn pixel provides us with additional information about those interested in our products, including job titles, employers or the industry in which they work.

When you visit the website, the LinkedIn pixel may also process the following data:

- IP address
- interactions on our website (e.g. page views, clicks, conversions)
- Browser information
- Device information
- The URL of the visited website
- Date and time of access

Direct identifiers are automatically removed from the data stock by LinkedIn within seven days, and the data is deleted after 180 days. The storage duration of the cookie can be found in our consent solution. The data is stored and processed by LinkedIn, which makes it possible to link it to the respective user profile.

These processing operations are carried out exclusively with the express consent of the user in accordance with Art. 6 para. 1 lit. a) GDPR.

LinkedIn is certified under the EU-US Data Privacy Framework. This constitutes an adequacy decision in accordance with Art. 45 GDPR, which means that personal data may be transferred without further guarantees or additional measures.

For more information on data protection, please visit:

<https://de.linkedin.com/legal/privacy-policy>.

### 13.2 Meta Pixel (formerly Facebook Pixel)

This website uses the "meta pixel" of Meta Platforms, Inc, 1 Hacker Way, Menlo Park, CA 94025, USA ("Meta"). If explicit consent is given, this allows the behaviour of users to be tracked after they have seen or clicked on a Meta advertisement. This process is used to evaluate the effectiveness of the advertisements for statistical and market research purposes and can help to optimise future advertising measures.

When you visit the website, the following data may be processed by the meta pixel:

- IP address,
- Device information,
- Browsing history,
- Interactions on our website (e.g. page views, clicks, conversions).

The data is stored and processed by Meta so that a connection to the respective user profile is possible and Meta can use the data for its own advertising purposes in accordance with the Facebook Data Usage Policy (<https://www.facebook.com/about/privacy/>). This enables Meta and its partners to place adverts on and off Facebook. A cookie may also be stored on your computer for these purposes.

The collected data is stored by Meta for a period of 180 days and then deleted if the website is not visited again by the user.

These processing operations are only carried out if express consent is given in accordance with Art. 6 (1) lit. a) GDPR.

Meta is certified under the EU-US Data Privacy Framework. This constitutes an adequacy decision pursuant to Art. 45 GDPR, meaning that personal data may also be transferred without further guarantees or additional measures.

### 13.3 Google Analytics 4 (GA4)

On our websites we use Google Analytics 4 (GA4), a web analytics service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. ("Google").

In this context, pseudonymised usage profiles are created and cookies are used. The information generated by the cookie about your use of this website can be, among other things:

- a short-term recording of the IP address without, permanent storage
- Browser information,
- Date and time of access,
- Device information,
- The URL of the visited website,
- Geographic location,

The pseudonymised data may be transferred by Google to a server in the USA and stored there.

The information is used to evaluate the use of the website, to compile reports on website activity and to provide other services related to website and internet use for the purposes of market research and demand-oriented design of these internet pages. This information may also be transferred to third parties if this is required by law or if third parties process this data on our behalf. Under no circumstances will your IP address be merged with other Google data.

These processing operations are carried out exclusively when explicit consent is given in accordance with Art. 6 (1) lit. a) GDPR.

The parent company Google LLC is certified as a US company under the EU-US Data Privacy Framework. There is hereby an adequacy decision pursuant to Art. 45 GDPR, so that a transfer of personal data may also take place without further guarantees or additional measures.

Additional information on the service can be found at the following link: <https://support.google.com/analytics/answer/12017362?hl=de>.

### 13.4 Google Analytics 4 (GA4) - Additional information on Google Signals

Google Signals is a feature in Google Analytics that collects session data from websites and apps where users are logged in with their Google Account and have enabled personalised advertising. It enables advanced analysis by linking user behaviour across different devices and providing additional information such as demographic characteristics and interests. Your consent to the use of Google Analytics (see above) also includes consent to the Google Signals add-on function.

### 13.5 Google Analytics 4 (GA4) - Additional information on Consent Mode, basic implementation

Under the Digital Markets Act, Google is obliged to obtain user consent before processing user data for personalised advertising. Google fulfils this requirement with the "Consent Mode". Users are obliged to implement this and thus prove that they have obtained the consent of website visitors.

Google offers two implementation modes, the basic and the advanced implementation.

We use the basic implementation method of Google Consent Mode. Only if you give your consent to the use of Google Analytics (see above) will a connection to Google be established, a Google code executed and the processing described above carried out. If you refuse consent, Google will only receive information that consent has not been given. The Google code is not executed and no Google Analytics cookies are set.

## 13.6 Google Analytics 4 (GA4) - Additional information on consent mode, advanced implementation

Under the Digital Markets Act, Google is obliged to obtain user consent before processing user data for personalised advertising. Google fulfils this requirement with the "Consent Mode". Users are obliged to implement this and thus prove that they have obtained the consent of website visitors.

Google offers two implementation modes, the basic and the advanced implementation.

We use the extended implementation method of Google Consent Mode. If you consent to data processing in connection with the use of GA4 (see above), a connection to Google is established, Google Analytics cookies are set and the corresponding processing is carried out. If you refuse consent, no Google Analytics cookies will be set. However, a unique 'ping ID' will be generated and transmitted to Google. The Google code is executed, whereby only limited user data is transmitted to Google, including information such as:

- IP address
- Browser details
- Visited URL

A personalised user ID is not assigned.

If you have consented to the execution of Google Analytics 4, Consent Mode, extended implementation, the legal basis for the processing of personal data is Art. 6 (1) lit. a GDPR. In addition, it is in our legitimate interest within the meaning of Art. 6 (1) lit. f GDPR to use Google Analytics 4, Consent Mode, extended implementation, in order to obtain data on conversions without creating user profiles and thus increase profitability.

## 13.7 LinkedIn Analytics

This website uses the retargeting tool as well as the conversion tracking of LinkedIn Ireland, Wilton Plaza, Wilton Place, Dublin 2, Irland (LinkedIn).

For this purpose, the LinkedIn Insight Tag is integrated on our website, which enables LinkedIn to collect statistical data about your visit and use of our website and to provide us with corresponding aggregated statistics on this basis. In addition, the service is used to be able to show you interest-specific and relevant offers and recommendations after you have found out about certain services, information and offers on the website. The relevant information is stored in a cookie.

As a rule, the following data are collected and processed in the process:

- IP-address,
- Device-information,
- Browser-information,
- Referrer-URL and
- Timestamp.

These processing operations are only carried out when express consent is given in accordance with Art. 6 (1) lit. a) GDPR. Your data will be stored until you withdraw your consent.

Personal data are kept for as long as they are necessary to fulfil the purpose of processing. The data will be deleted as soon as they are no longer necessary to achieve the purpose.

Within the scope of processing via LinkedIn, data may be transferred to the USA and Singapore. The US company is certified under the EU-US Data Privacy Framework. This constitutes an adequacy decision pursuant to Art. 45 GDPR, meaning that personal data may be transferred without further guarantees or additional measures. Furthermore the security of the transfer is regularly ensured by so-called standard contractual clauses, which guarantee that the processing of personal data is subject to a level of security that corresponds to that of the GDPR. If the standard contractual clauses are not sufficient to ensure an adequate level of security, your consent will be obtained in accordance with Art. 49 (1) lit. a) GDPR.

Additional information on the service can be found at the following link: <https://de.linkedin.com/legal/privacypolicy>. ("Meta").

## 14. Plugins and other services

### 14.1 Getty Images pictures

On this website, components of the company Getty Images have been integrated. The operating company of the Getty Images components is Getty Images International, 1st Floor, The Herbert Building, The Park, Carrickmines, Dublin 18, Ireland. Getty Images International is part of the Getty Images group of companies with headquarters at 605 5th Avenue South Suite 400 Seattle, Washington 98104, USA.

Getty Images is an American stock photo agency that offers images and other visual material. Through a stock photo agency, various customers, in particular website operators, editorial departments of print and TV media and advertising agencies, license the images they use.

Getty Images allows the embedding of images (possibly free of charge). Embedding is the integration of a certain foreign content (text, video or image data) which is provided by another website and then appears on the own website. For embedding, a so-called embedding code is used. If an embedding code has been integrated by an Internet site operator, the external content of the other Internet site is displayed immediately by default as soon as an Internet site is visited. Getty Images provides more information about embedding content at the link <https://www.gettyimages.de/resources/embed>.

Through the technical implementation of the embed code that enables the display of images from Getty Images, your IP address is transmitted to Getty Images. Furthermore, Getty Images captures our website, the browser type used, the browser language, the time and the length of access. In addition, Getty Images may collect information about which of our subpages you visited and which links were clicked, as well as other interactions you performed while visiting our site. This data may be stored and analyzed by Getty Images.

These processing operations are carried out exclusively when explicit consent is given in accordance with Art. 6 (1) lit. a) GDPR.

This US company is certified under the EU-US Data Privacy Framework. There is hereby an adequacy decision pursuant to Art. 45 GDPR, so that a transfer of personal data may also take place without further guarantees or additional measures.

Additional information on the service can be found at the following link: <https://www.gettyimages.de/enterprise/privacy-policy>.

### 14.2 Google Maps

We use Google Maps (API) on our website. The operating company of Google Maps is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. Google Ireland Limited is part of the Google group of companies with headquarters at 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Google Maps is a web service for displaying interactive (land) maps in order to visually present geographical information. By using this service, for example, our location can be displayed to you and a possible approach can be facilitated.

Already when calling up those sub-pages in which the map of Google Maps is integrated, information about your use of our website (such as your IP address) is transmitted to Google servers in the USA and stored there, as long as you have given your consent within the meaning of Art. 6 (1) lit. a) GDPR. In addition, Google Maps reloads the Google Web Fonts and Google Photo (as well as Google stats). The provider of these services is also Google Ireland Limited. When you call up a page that embeds Google Maps, your browser loads the web fonts and photos required to display Google Maps into your browser cache. Also for this purpose, the browser you are using establishes a connection to Google's servers. Through this, Google obtains knowledge that our website was accessed via your IP address. This occurs regardless of whether Google provides a user account through which you are logged in or whether no user account exists. If you are logged in to Google, your data will be directly assigned to your account. If you do not want the assignment with your profile at Google, you must log out of your Google user account. Google stores your data (even for users who are not logged in) as usage profiles and evaluates them. You have the right to object to the creation of these user profiles, and to exercise this right you must contact Google as follows.

If you do not agree to the future transmission of your data to Google in the context of the use of Google Maps, you also have the option of completely disabling the Google Maps web service by turning off the JavaScript application in your browser. Google Maps and thus also the map display on this website can then not be used.

These processing operations are carried out exclusively when explicit consent is given in accordance with Art. 6 (1) lit. a) GDPR.

Additional information on the service can be found at the following links <https://www.google.de/intl/de/policies/terms/regional.html> [https://www.google.com/intl/de\\_US/help/terms\\_maps.html](https://www.google.com/intl/de_US/help/terms_maps.html)

The parent company Google LLC is certified as a US company under the EU-US Data Privacy Framework. There is hereby an adequacy decision pursuant to Art. 45 GDPR, so that a transfer of personal data may also take place without further guarantees or additional measures.

The privacy policy of Google Maps could be found here: ("Google Privacy Policy"): <https://www.google.de/intl/de/policies/privacy/>.

### 14.3 Microsoft Teams

We use the tool "Microsoft Teams" ("MS-Teams") to conduct our communication both in written form (chat) and in the form of telephone conferences, online meetings and video conferences. The operating company of the service is Microsoft Ireland Operations ("Microsoft"), Ltd., 70 Sir John Rogerson's Quay, Dublin, Ireland. Microsoft Ireland Operations, Ltd. is part of the Microsoft group of companies headquartered at One Microsoft Way, Redmond, Washington, USA.

When using MS Teams, the following personal data are processed:

- Meetings, chats, voicemails, shared files, recordings, and transcriptions.
- Data that is shared about you. Examples include your email address, profile picture and phone number.
- A detailed history of the phone calls you make.
- Call quality data.
- Support/feedback data Information related to troubleshooting tickets or feedback sent to Microsoft.
- Diagnostic and Service Data Diagnostic data related to service usage.

To enable the display of video and the playback of audio, data from your end device microphone and from an end device video camera will be processed for the duration of the meeting. You can turn off or mute the camera or microphone yourself at any time using the "Microsoft Teams" applications.

If a corresponding consent has been requested, the processing is carried out exclusively on the basis of Art. 6 (1) lit. a) GDPR. In the context of an employee relationship, corresponding data processing is carried out on the basis of § 26 German Federal Data Protection Act (Bundesdatenschutzgesetz [BDSG]). The legal basis for the use of the service in the context of existing contractual relationships or contractual relationships to be initiated is Art. 6 (1) lit. b) GDPR. In all other cases, the legal basis for processing your personal data is Art. 6 (1) lit. f) GDPR. Here, our interest is in the effective implementation of online meetings.

When we record online meetings, we will tell you before we start and, if necessary, ask you to consent to the recording. If you do not wish to do so, you can leave the online meeting.

As a cloud-based service, "MS-Teams" processes the aforementioned data in the course of providing the service. To the extent "MS-Teams" processes personal data in connection with Microsoft's legitimate business operations, Microsoft is an independent data controller for such use and, as such, is responsible for compliance with applicable laws and obligations of a data controller. To the extent you access the MS Teams website, Microsoft is the data controller. Accessing the Internet site is necessary to download the MS-Teams software.

If you do not wish to or are unable to download the software, the service can be provided via your browser and to that extent also via the Microsoft website.

This US company is certified under the EU-US Data Privacy Framework. There is hereby an adequacy decision pursuant to Art. 45 GDPR, so that a transfer of personal data may also take place without further guarantees or additional measures.

Additional information on the service can be found at the following link: <https://docs.microsoft.com/de-de/microsoftteams/teams-privacy>.

#### 14.4 YouTube (Videos)

We have integrated components of YouTube on this website. The operating company of YouTube is YouTube, LLC, 901 Cherry Ave, San Bruno, CA 94066, USA. YouTube, LLC is a subsidiary of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

If you are logged in to YouTube at the same time, YouTube recognizes which specific subpage of our website you are visiting when you call up a subpage that contains a YouTube video. This information is collected by YouTube and Google and assigned to your YouTube account.

YouTube and Google always receive information via the YouTube component that you have visited our website if you are logged into YouTube at the same time as calling up our website; this takes place regardless of whether you click on a YouTube video or not. If you do not want this information to be transmitted to YouTube and Google, you can prevent the transmission by logging out of your YouTube account before accessing our website.

These processing operations are carried out exclusively when explicit consent is given in accordance with Art. 6 (1) lit. a) GDPR.

The parent company Google LLC is certified as a US company under the EU-US Data Privacy Framework. There is hereby an adequacy decision pursuant to Art. 45 GDPR, so that a transfer of personal data may also take place without further guarantees or additional measures.

Additional information on the service can be found at the following link: <https://www.google.de/intl/de/policies/privacy/>.

## 15. Payment provider

#### 15.1 PayPal

We have integrated components of PayPal on this website. The European operating company of PayPal is PayPal (Europe) S.à.r.l. & Cie. S.C.A., 22-24 Boulevard Royal, 2449 Luxembourg, Luxembourg. PayPal is an online payment service provider. Payments are processed via so-called PayPal accounts, which represent virtual private or business accounts. In addition, PayPal offers the possibility to process virtual payments via credit cards if a user does not maintain a PayPal account. A PayPal account is managed via an e-mail address, which is why there is no classic account number. PayPal makes it possible to initiate online payments to third parties or to receive payments as well. PayPal also assumes trustee functions and offers buyer protection services.

If you select "PayPal" as a payment option during the ordering process in our online store, your data will be automatically transmitted to PayPal. By selecting this payment option, you consent to the transmission of personal data required for payment processing.

The personal data transmitted to PayPal are usually first and last name, address, e-mail address, IP address, telephone number, cell phone number or other data that are necessary for payment processing. For the processing of the purchase contract are also such personal data that are related to the respective order.

The transmission of data is for the purpose of payment processing and fraud prevention. We will transmit personal data to PayPal in particular if there is a legitimate interest for the transmission. The personal data exchanged between PayPal and us may be transmitted by PayPal to credit reporting agencies. This transmission is for the purpose of checking identity and creditworthiness.

PayPal may share the personal data with affiliated companies and service providers or subcontractors to the extent necessary to fulfill contractual obligations or to process the data on behalf.

You have the option to revoke your consent to the handling of personal data at any time towards PayPal. A revocation does not affect personal data that must be processed, used or transmitted mandatory for (contractual) payment processing.

The use of PayPal is in the interest of proper and smooth payment processing. This represents a legitimate interest within the meaning of Art. 6 (1) lit. f) GDPR. The transmission of your personal data takes place exclusively with the granting of explicit consent in accordance with Art. 6 (1) lit. a) GDPR.

The applicable PayPal privacy policy can be found at: <https://www.paypal.com/de/webapps/mpp/ua/privacy-full>.

## 16. Your rights as a data subject

#### 16.1 Right to confirmation

You have the right to request confirmation from us as to whether personal data relating to you will be processed.

#### 16.2 Right to information (Article 15 GDPR)

You have the right to obtain information about the personal data stored about you at any time, free of charge, as well as the right to access a copy of such data from us, in accordance with the statutory provisions.

#### 16.3 Right to rectification (Article 16 GDPR)

You have the right to request the immediate rectification of incorrect personal data relating to yourself. Furthermore, the data subject has the right to request the completion of incomplete personal data, taking into account the purposes of the processing.

#### 16.4 Erasure (Article 17 GDPR)

You have the right to demand that we erase the personal data relating to you be deleted without delay, provided that one of the reasons provided by law applies and if processing or further storage is not required.

#### 16.5 Restriction to processing (Article 18 GDPR)

You have the right to request that we restrict the processing of your data if one of the legal requirements is met.

#### 16.6 Data transferability (Article 20 GDPR)

You have the right obtain personal data relating to you that you provided us in a structured, commonly used and machine-readable format. You also have the right to transfer this data to another controller without hindrance by us, to whom the personal data was provided, provided that the processing is based on the consent pursuant to Art. 6 (1) lit. a) GDPR or Art. 9 (2) lit. a) GDPR or on a contract pursuant to Art. 6 (1) lit. b) GDPR, and the data are processed using automated procedures, unless processing is necessary to complete a task, is in the public interest or is carried out in the exercise of an official authority assigned to us.

Furthermore, when exercising your right to data transferability pursuant to Art. 20 (1) GDPR, you have the right to have personal data transferred directly from one controller to another, provided this is technically feasible and does not impede the rights and freedoms of other persons.

#### 16.7 Objection (Article 21 GDPR)

You have the right to lodge an objection to the processing of personal data relating to you for reasons relating to your particular situation where this is done on the basis of Art. 6 (1) lit. e) (data processing in the public interest) or lit. f) (data processing on the basis of the weighing of legitimate interests) GDPR.

This also applies to profiling based on these provisions pursuant to Article 4 Number 4 GDPR.

Should you lodge an objection, we will no longer process your personal data unless we can demonstrate compelling and legitimate reasons for such processing that outweigh your interests, rights and freedoms, or where processing serves the assertion, exercise or defence of legal claims.

In individual cases, we process your personal data for direct marketing purposes. You have the right to object at any time to the processing of personal data for the purpose of such advertising. This also applies to profiling where this is connected to this kind of direct marketing. Should you object to the processing of your data for direct marketing purposes, we will no longer process your personal data for this purpose.

In addition, you have the right to object to our processing of your personal data for scientific or historical research purposes or for statistical purposes pursuant to Article 89 (1) GDPR for reasons arising from your particular situation, unless such processing is necessary for the performance of a task in the public interest.

You are free to exercise your right to lodge an objection in relation to the use of information society services, Directive 2002/58/EC notwithstanding, by means of automated procedures using technical specifications.

#### 16.8 Revocation of consent regarding data protection

You have the right to revoke any consent to the processing of personal data at any time with future effect.

#### 16.9 Lodging a complaint with a supervisory authority

You have the right to complain to a supervisory authority responsible for data protection about our processing of personal data.

## 17. Routine storage, erasure and blocking of personal data

We process and store your personal data only for the period of time necessary to meet the storage purpose or as required by the legal provisions to which our company is subject.

If the storage purpose no longer applies or if a required retention period expires, personal data will be routinely blocked or erased in accordance with the statutory provisions.

## 18. Duration of storage of personal data

The criterion for the duration of the retention of personal data is the respective legal retention period. Once this period expires, the data in question will be routinely erased, provided it is no longer required for the fulfilment or initiation of the contract.

## 19. Version and amendments to the Privacy Notice

This Privacy Policy is currently valid as of: March 2025.

Due to the further development of our Internet pages and offers or due to changed legal or official requirements, it may become necessary to change this Privacy Policy. You can access and print out the current data protection declaration at any time on the website under "<https://www.rhodiumabrasives.com/datenschutz>".