

Information on the processing of personal data pursuant to Article 13f. of the GDPR – ARUG

Introduction

The protection of your personal data is important to us and a matter we care deeply about. Compliance with legal regulations is a matter of course for us. In the following, we provide you with an overview of how we process your personal data and information on your rights under data protection law.

1. Name and contact details of the controller

Responsible for the processing of your personal data:

PWO AG ("PWO")
Industriestraße 8, 77704 Oberkirch, Germany
+49 7802 84-0, info.de@pwo-group.com

2. Contact details of the data protection officer

You can reach our company data protection officer at:

Data Protection Officer
PWO AG
Industriestraße 8, 77704 Oberkirch, Germany
+49 7802 84-0, datenschutz@pwo-group.com

3. Purposes and legal basis of processing

1. Purposes

Improving the identification ("know-your-shareholder") and information of shareholders by PWO for a successful inclusion of shareholders in PWO's business policy decision-making and voting processes.

2. Legal basis

- Compliance with a legal obligation (Article 6(1)(c) of the GDPR in conjunction with sections 67(a)ff. of the AktG)

Your personal data is processed to comply with the legal obligations set out in the Act Implementing the Second Shareholders' Rights Directive (ARUG II) and set out in sections 67(a)ff. of the AktG.

- Balancing of interests (Article 6(1)(f) of the GDPR)

If necessary, we process your data to protect our legitimate interests or those of third parties.

4. Legitimate interests

Our legitimate interests are in particular:

- Facilitating communication with our shareholders
- Making it easier for our shareholders to exercise their rights

5. Categories of personal data

The categories of personal data processed include in particular:

- General personal data (name, address, e-mail address, date of birth)
- Ownership characteristics (shareholdings)

6. Recipients of the personal data

Within PWO, only the members of the Executive Board and their assistants as well as the employees of the IR department and the legal department receive your personal data.

PWO uses an external service provider, CAPTRACE GmbH, Äppelallee 27, 65203 Wiesbaden (CAPTRACE), to retrieve the above-mentioned personal data from your financial intermediary (e.g. your bank). CAPTRACE necessarily obtains knowledge of the above-mentioned personal data insofar as this is provided for in the order processing contract concluded between CAPTRACE and PWO, which must comply with the requirements of Article 28 GDPR.

7. Transfers to a third country or an international organization

We exclusively store data in data centers in Germany, that means we do not process data outside the EU.

8. Storage duration

If PWO becomes aware that a shareholder is no longer a shareholder of PWO, PWO will only store the shareholder's personal data for a maximum of twelve months, subject to other statutory provisions. PWO is permitted to store the data for a longer period of time, if this is necessary in the course of legal proceedings.

9. Rights of the data subject

With regard to the processing of your personal data, you as a data subject have the following rights in accordance with Article 15ff. of the GDPR:

1. You can request confirmation as to whether or not personal data concerning you is being processed by us. If this is the case, you have the right to access this personal data and to further information related to the processing (Article 15 of the GDPR). Please note that this access right may be restricted or excluded in certain cases.
2. In the event that personal data about you is not (or no longer) accurate or incomplete, you may request that this data be corrected or, if necessary, completed (Article 16 of the GDPR).
3. If the legal requirements are met, you can request the deletion of your personal data (Article 17 of the GDPR) or the restriction of the processing of this data (Article 18 of the GDPR). However, the right to erasure pursuant to Article 17(1) and (2) of the GDPR does not exist, inter alia, if the processing of personal data is necessary for compliance with a legal obligation (Article 17(3)(b) variant 1 of the GDPR) or for the establishment, exercise or defense of legal claims (Article 17(3)(e) of the GDPR).
4. For reasons arising from your particular situation, you can object to the processing of your personal data at any time (Article 21 of the GDPR). If the legal requirements are met, we will then no longer process your personal data.

10. Right to withdraw consent

In the event that we process your personal data with your consent for the purposes of your employment relationship, you may object to this use of your data at any time without giving reasons. We shall no longer process the personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

11. Right to lodge a complaint with a supervisory authority

You have the right to complain to a supervisory authority within the meaning of Article 51 of the GDPR about the processing of your personal data. The competent supervisory authority is:

State Commissioner for Data Protection and Freedom of Information
Heilbronner Straße 35, 70191 Stuttgart

Telephone: +49 711 615541-0
Fax: +49 711 615541-15

E-Mail: poststelle@lfdi.bwl.de

Internet: www.baden-wuerttemberg.datenschutz.de/online-beschwerde/

12. Sources

We collect the above-mentioned personal data from your financial intermediary (e.g. your bank) via CAPTRACE. The data originates from the custody account agreement concluded between you and your financial intermediary (e.g. your bank).

13. Obligation to make available

You are not obliged to provide us with your personal data directly. However, you are obliged to make your personal data available to the financial intermediary commissioned by you, who in turn is obliged to make it available to us.

14. Automated decision-making and profiling

Automated decision-making is a decision made exclusively by a machine without the evaluation of a natural person. We do not use automated decision-making in accordance with Article 22 of the GDPR. If we use this in individual cases, we will inform you of this separately if this is required by law and, if necessary, obtain your prior consent.

“Profiling” describes any form of automated processing of personal data intended to analyze or predict the work performance, economic situation, health, personal preferences, interests, reliability, behavior, location or movements of a natural person. PWO does not use profiling as a matter of principle. If we use this in individual cases, we will inform you of this separately if this is required by law and, if necessary, obtain your prior consent.
