

## Privacy Policy

This Privacy Policy provides you with information on how Lenzing Papier GmbH, Werkstraße 2, 4860 Lenzing, („we“) will process your personal data as

- a) visitors to our website [www.lenzingpapier.com](http://www.lenzingpapier.com) or
- b) (potential) customer.

This includes all personal data processed through your use of our site [www.lenzingpapier.com](http://www.lenzingpapier.com) or any subdomains including any information you may provide to us when you purchase a product or service, sign up to our email list or take part in a prize draw or competition.

### 1. Purposes for which we process your data

We will process the categories of your personal data set out below for the following purposes:

- a. to manage our sales processes;
- b. to manage our customer relations, including human relations and communications, including the analysis of customers' business needs and how they use our products and services;
- c. to operate, manage and ensure the security of our website;
- d. to manage on-site visits;
- e. to analyze and forecast customer demand;
- f. to organize events;
- g. to analyze customer satisfaction;
- h. to provide you with information regarding our services and events;
- i. to conduct surveys and
- j. to conduct direct marketing and advertising via electronic and non-electronic means.

We collect your personal data either

- from you directly, in the course of our communication, our business relationship, or your visit on our website, or
- from public sources (e.g., social media, public internet sources, public attendance lists of conferences or books), or
- through our employees, who are in contact with you or manage your on-site visit.

You are under no obligation to provide us with the data we ask you for. However, if you do not provide your personal data different business processes or marketing processes might be delayed or even impossible and it might become impossible for you to attend our events. Moreover you will not get any information about relevant products and services, such as technical services, online courses; books; live broadcast trainings such as webinars; coaching and mentoring services. Should the provision of your personal data be mandatory by law, we will inform you separately thereof.

We do not carry out automated decision making (including profiling) that would have legal effects for you or would significantly affect you in a similar way.

The provider of the websites (NOBUGS IT GmbH) automatically collects and stores information in so-called server log files, which your browser automatically transmits. These are:

- Date and time of the request
- Name of the requested file
- Website from which the file was requested
- access status (file transferred, file not found, etc.)
- web browser and operating system used
- complete IP address of the requesting computer or firewall/router
- amount of data transferred

This data is not merged with other data sources. The processing is carried out in accordance with Art. 6 (1) lit. f DSGVO on the basis of our legitimate interest in improving the stability and functionality of our website.

For reasons of technical security, in particular to defend against attempted attacks on our web server, we store this data for a short period of time. It is not possible for us to draw conclusions about individual persons on the basis of this data. After seven (7) days at the latest, the data is anonymized by shortening the IP address at domain level, so that it is no longer possible to establish a link to the individual user. The data is also processed in anonymized form for statistical purposes; it is not compared with other data or passed on to third parties, even in excerpts.

## **2. Processed data categories and legal bases of the processing**

We process the categories of your personal data listed in the Annex either on the basis of

- the performance of the contract we have concluded with you or the necessity to take steps at your request prior to entering into such an agreement, insofar as it is necessary (Article 6(1)(b) General Data Protection Regulation (“GDPR”)), or
- our overriding legitimate interest according to Article 6(1)(f) GDPR to achieve the purposes set out in point 1 lit. c to j above, or
- the necessity to comply with legal obligations to which we are subject (Article 6(1)(c) GDPR), or
- your explicit consent to the processing of your personal data for one or more specific purposes (Article 6(1)(a) GDPR).

Insofar as your personal data is processed based on your consent, you will be informed about the purposes of the processing when you give your consent. You can withdraw your consent at any time.

Withdrawing your consent does not affect the lawfulness of processing based on your consent before your withdrawal.

We do not collect any Sensitive Data about you. Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offences.

### **3. Transfer of your personal data**

To achieve the purposes set out above, we will transfer your personal data to the following categories of recipients:

- IT service providers that we use;
- legal representatives;
- banks for management of payment transactions;
- auditors for the performance of audits;
- courts and public authorities;
- competent administrative authorities, especially fiscal authorities;
- collection agencies for debt collection (only in so far as debts are collected abroad);
- external financiers, e.g., leasing or factoring companies, cessionaries etc., as far as the delivery or service is financed in such manner;
- contract partners or business partners who are or should be participating in the performance of the delivery or service;
- insurances in the context of the conclusion of an insurance contract concerning the delivery/service or occurrence of the insured event; and
- companies that are part of our corporate group.

Some of the recipients referred to above are located in or process personal data outside of your country. The level of data protection in another country may not be equivalent to that in your country. However, we only transfer your personal data to countries where the EU Commission has decided that they have an adequate level of data protection or we take measures to ensure that all recipients provide an adequate level of data protection. We do this for example by entering into appropriate data transfer agreements based on Standard Contractual Clauses (in accordance with Commission Implementing Decision (EU) 2021/914 of June 4, 2021.). These are accessible upon request (see the contact details in point 6).

### **4. Retention period**

Your personal data will only be kept for as long as it is necessary to achieve the purposes set out above.

We will, in any case, retain your personal data for as long as (i) required under statutory retention obligations or (ii) potential legal claims, where personal data is needed to raise or defend against the claim, are not yet time-barred.

## **5. Your rights in connection with your personal data**

Under applicable law, you have the right to (under the conditions set out in applicable law):

- obtain confirmation as to whether and what kind of personal data we store about you and to request copies of such data,
- request rectification or erasure of your personal data,
- request us to restrict the processing of your personal data,
- object to the processing of your personal data,
- withdraw any consent previously granted for the processing (withdrawing your consent does not affect the lawfulness of processing based on your consent before your withdrawal),
- request data portability, and
- lodge a complaint with the competent supervisory authority.

If you wish to exercise any of the rights set out above, please email us at [office@lenzingpapier.com](mailto:office@lenzingpapier.com).

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, if your request is clearly unfounded, repetitive or excessive we may charge a reasonable fee or refuse to comply with your request.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you.

## **6. Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these linked sites; feel free to email us in that regard at [office@lenzingpapier.com](mailto:office@lenzingpapier.com).

## 7. Cookies

We use cookies to improve your experience on our website. You can set your browser to refuse all or some browser cookies or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [cookies policy](#).

**Kommentiert [BM1]:** Hier aktuelle Cookie-Richtlinie verlinken.

## 8. Our contact details

Please address your requests or questions concerning the processing of your personal data to:

Lenzing Papier GmbH  
Werkstraße 2, 4860 Lenzing  
[office@lenzingpapier.com](mailto:office@lenzingpapier.com)

Last updated on ~~December~~ March 22nd0th, 2023~~2~~.

## Annex

### Categories of personal data of customers, interested parties, and website visitors:

- names
- titles
- gender
- nationality
- date and place of birth
- company name
- contact data (billing and delivery address, email address, phone numbers)
- data from our communication with you (through the contact form on our website, through a chat widget on our website, through email, Skype, social media messaging, social media posting or any other communication that you send us)
- agreements concluded and related data (e.g. expenses and earnings)
- company register data
- creditworthiness data
- VAT-number/Intrastat identification number
- tax liability and tax calculation data
- payment data (in particular bank details and credit card data)
- customer category
- IP address
- login data
- browser details
- data on how you use our website and any online services (e.g. date and time of visits, page views and navigation paths)
- time zone settings
- used devices
- communication preferences
- extent of power of representation
- date and time of visits
- signature
- receipt of and reaction to marketing and sales initiatives
- history of previous interactions with us
- professional and personal interests