



Giesecke+Devrient

Privacy Notice for Business Partners

Giesecke+Devrient GmbH
Prinzregentenstraße 161
81677 München

1st August 2023



General Privacy Notice for Business Partners of G+D

Giesecke+Devrient (“G+D”, “we” or “us”) attaches great importance to the protection of your personal data and ensuring transparency in its handling. We would therefore like to present you with the following information in line with the requirements set forth in the European General Data Protection Regulation (GDPR). This General Privacy Notice is intended for potential and existing customers and business partners of G+D with whom we have contact or a business relationship.

In order to comply with current legal requirements or to reflect adjustments to our services, it may be necessary to adapt this privacy policy in whole or in part.

Data Controller

The identity of G+D as data controller is determined by your business relationship with us. It is regularly one of the following G+D entities at the group headquarters in Munich:

- Giesecke+Devrient GmbH, Prinzregentenstraße 161, 81677 Munich, Germany
- Giesecke+Devrient Currency Technology GmbH, Prinzregentenstraße 161, 81677 Munich, Germany
- Giesecke+Devrient Mobile Security Germany GmbH, Prinzregentenstraße 161, 81677 Munich, Germany
- Giesecke+Devrient ePayments GmbH, Prinzregentenstraße 161, 81677 Munich, Germany

Deviations are possible, for example if your business relationship is with a regional subsidiary of G+D, which then regularly acts as data controller. A list of subsidiaries can be found [here](#).

Group Privacy Officer

Giesecke+Devrient GmbH, Group Privacy Officer, Prinzregentenstraße 161, 81677 Munich, Germany, privacy@gi-de.com

Type and origin of personal data

Your personal data is usually collected directly from you. If we receive data from third parties, we ensure compliance with the applicable legal requirements.

Depending on the respective business purposes, we process the following categories of personal data as data controller:

- Master data and contact data (e.g. gender, name, company, business address, function, job title, e-mail, telephone and other contact information);
- Communication data as part of the business communications between you and us;
- Visitor data including data from access control and building monitoring;
- Electronic identification data where required (e.g. login, access right, passwords, badge number, IP address, online identifiers/cookies, logs, access and connection times);
- Contract and payment information (e.g. credit card details, bank account details, VAT or other tax identification number);
- Additional data you provide to us, for example within the scope of an inquiry or our business relationship;
- Data which relate to our products and services;
- Data in the context of your participation in our events.

Commissioned data processing

For personal data that we process as data processor in the sense of Art. 4 No. 8 GDPR on behalf of our customers (e.g. for the production of smart cards) the respective customer remains the data controller under applicable data protection laws. In these cases, the processing is carried out on behalf of and on the instructions of the customer with the consequence that the rights of the affected individuals relating to this data must be asserted against the respective customer directly.

Purpose and legal basis for processing data

We process the data listed above for the following purposes:

- To establish and fulfill a contract with you or with the entity on behalf of which you act, for example, if you make a purchase from us or enter into an agreement to provide or receive services or use one of our webshops;
- To manage and maintain a contract with you or with the entity on behalf of which you act;
- To answer your requests and provide you with efficient support;
- To respond to any comments or complaints we may receive from you, including to investigate any complaints received from you or from others;
- To detect and prevent misuse of our products and/or services;
- To invite you to events or promotional meetings sponsored by us;
- To invite you to take part in market research or surveys;
- To enable you to participate in virtual events organized by G+D and to ensure that such events are conducted properly;
- To manage our IT resources, including infrastructure management and business continuity;
- To preserve the company's economic interests and ensure compliance and reporting (such as complying with our policies and legal requirements, tax and deductions, managing alleged cases of misconduct or fraud; conducting audits and defending litigation);
- To fulfill the company's obligations with regard to the prevention of money laundering;
- To manage mergers and acquisitions involving our company;
- Archiving and record keeping;
- Billing and invoicing;
- Any other purposes imposed by law or authorities.

Additional purposes may result from your individual business relationship with G+D.

Personal data will only be processed on a valid legal basis, particularly if:

- we have obtained your prior consent (Article 6 par. 1 lit. a GDPR);
- the processing is necessary to perform contractual obligations (including pre-contractual steps) (Article 6 par. 1 lit. b GDPR);
- the processing is necessary to comply with our legal or regulatory obligations (Article 6 par. 1 lit. c GDPR); or
- the processing is necessary for our legitimate interests and does not unduly affect your interests or fundamental rights and freedoms (Article 6 par. 1 lit. f GDPR).

The legitimate interest arises from the described business objectives. However, in such cases, we always seek to maintain a balance between our legitimate interests and your privacy. Examples of such legitimate interests are marketing activities (e.g. offering of products and/or services to our customers); prevention of fraud or criminal activity and misuse of our products and/or services including the security of our IT systems, architecture and networks; use of cost-effective services offered by



suppliers; selling of any part of our business or its assets and meeting our corporate and social responsibility objectives.

Storage period

Personal data are generally stored for the fulfillment of the underlying purposes. Data will be deleted as soon as such purposes have been fulfilled and the data is no longer required, provided that this is not prevented by any statutory retention periods (e.g. as indicated in the German Commercial Code (HGB), the German Criminal Code (StGB) or the German Fiscal Code (AO)) or by any other legal or official regulation. Personal data processed in the context of any possible or ongoing dispute or legal action will be stored for the duration of the legal dispute, proceedings or limitation period, whichever is longer.

The storage limitation of personal data which we process as data processor on behalf of our customers (see chapter Commissioned Data Processing above) is determined by the underlying agreements, in particular the service specifications, as well as the individual customer instructions. For example, in the production of smart cards, these are 30 days for payment traffic data, which are subject to the PCI specifications, and 90 days for health cards, which are subject to the requirements of the Gematik.

Recipients/categories of recipients and data transfers

For the fulfillment of the purposes listed herein, your personal data may be accessed by or transferred to the following categories of recipients:

- Personnel of the G+D entity that maintains the business relationship with you including personnel of responsible departments of other G+D subsidiaries;
- suppliers and services providers of G+D including IT systems providers, cloud service providers, database providers and consultants;
- tax consultants advisors and external lawyers;
- (national and international) regulatory authorities, public bodies or courts where we are required to do so by applicable law or at their request.

Personal data may also be processed in a country outside the country where you, the entity on behalf of which you act or G+D is located, including third countries outside the European Union or the European Economic Area. When personal data is transferred to third parties in other jurisdictions, we will make sure to protect your personal data by applying the level of protection required under applicable data protection laws. For data transfers within G+D group companies, G+D's Binding Corporate Rules apply (Art. 46 para. 2 (b), 47 GDPR). Further information on G+D Binding Corporate Rules can be found [here](#).

Rights of the data subject

To enforce your data privacy rights, you can contact us at any time.

Data subject rights according to Art. 15 - 21 GDPR:

- **Right to access** information about your personal data stored by us (Article 15 GDPR)
- **Right to rectification** of inaccurate or incomplete personal data concerning you stored by us (Article 16 GDPR)
- **Right to erasure** of your personal data stored by us, e.g. if there is no longer a legitimate business purpose for processing in accordance with applicable law and statutory storage obligations do not require further storage (Article 17 GDPR)
- **Right to restriction of processing**, if the accuracy of the personal data is contested by you or the processing is unlawful (Article 18 GDPR)
- **Right to data portability**, i.e. the right to receive the personal data concerning you, which you have provided us with in a structured, commonly used and machine-readable format (Article 20 GDPR)
- **Right to object** for the processing of your personal data insofar as such processing is carried out based on Article 6 par. 1 lit. e. or f. GDPR (Article 21 GDPR)
- **Right to withdraw consent** (Article 7 GDPR)

If you have the impression that the processing of your personal data does not comply with data privacy laws, you have the right to file a complaint with a supervisory authority (Art. 77 DSGVO).

A list of data protection authorities in Germany can be found under the following link: [Addresses of German data protection authorities](#)

A list of European data protection authorities can be found at the following link: [Addresses of European data protection authorities](#)

The supervisory authority responsible for G+D at its group headquarters in Munich is the State Office for Data Protection Supervision in Bavaria ([Landesamt für Datenschutzaufsicht in Bayern](#)).