

# Data privacy information

**Information concerning data processing for manufacturers, customers, service providers or contractors as well as applicants, trainees, and visitors\* to the ECOMAL Group in Europe**

## Controller

The controller for the centralised data processing of all companies belonging to the ECOMAL group in Europe is ECOMAL Europe GmbH (hereinafter referred to as "ECOMAL"). It is represented by the Managing Directors Mr. Alexander Dziadur and Mr. Dirk Sandmann.

The controller and his representatives can be reached at

Address: Wilhelm-Schauenberg-Str.7, 79199 Kirchzarten, Germany  
Tel.: +49 7661 395-0  
Fax: +49 7661 395-980  
E-mail: [info@ecomal.com](mailto:info@ecomal.com)

## Data protection officer

As the external data protection officer, ECOMAL has appointed:

**Rechtsanwalt Marc E. Evers**  
**DataSEKure Rechtsanwalts-gesellschaft mbH**  
Weilerstr. 9  
79252 Stegen, Germany  
Tel.: +49 761 - 3876955  
E-mail: [datenschutz@datasekure.de](mailto:datenschutz@datasekure.de)  
[www.datasekure.de](http://www.datasekure.de)

## Categories of personal data

ECOMAL processes the following personal data (hereinafter referred to as "personal data" or "data") of manufacturers, customers, service providers / contractors as well as applicants, trainees, other visitors and any employees of the aforementioned (hereinafter referred to individually as "data subjects" and/or mainly as "data subjects"), provided that these data have actually been collected:

- Surname, first name
- Company, address, country
- Telephone, fax, e-mail and other contact details
- Job title; function
- Bank details
- Image data (within the framework of access to ECOMAL in Kirchzarten)
- Video data (within the framework of access to ECOMAL in Kirchzarten)
- Other data, which the data subjects may receive within the scope of the contractual relationship and/or the application process to ECOMAL, e.g. dates of birth, curriculum vitae, nationality, tax identification number, tax class, pension insurance number, religious denomination and details of the applicant's health insurance.

The personal data which is processed does not originate from public sources. The data to be processed originate directly from personal sphere of the data subjects.

## Legal basis for the processing of personal data

The following permissions in accordance with art.6 para.1 General Data Protection Regulation (GDPR) form the legal basis.

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- Art.6 para.1 sent. 1 lit.a GDPR (consent of the data subject),
- Art.6 para.1 sent.1b GDPR (performance of a contract with the data subject),
- Art. 6 para. 1 sent. 1c GDPR (fulfilment of a legal obligation to which ECOMAL is subject), and/or
- Art.6 para.1 sent.1f GDPR (safeguarding the legitimate interest of ECOMAL or a third party without overriding the interest and fundamental freedoms of the data subject).

### Purpose of data processing and data storage

The collection of data and the processing/usage serve the purpose of administration, accounting and communication with the data subject. This includes the implementation and maintenance of the respective contractual relationship or application process as well as advertising, contacting for the provision of information, clarification of technical questions, invitations to trade fairs, sending of component samples and organisation, sending of newsletters and the implementation of webinars

ECOMAL stores the collected data in ECOMAL's internal EDP system as well as physically in the specialist departments. Storage is also outsourced to external order processors. ECOMAL secures the collected personal data against unauthorised access through legally compliant organisational and technical precautions.

### Recipients of personal data

Individual personal data is transferred to the processors employed by ECOMAL (e.g. IT service providers, document shredders etc.).

Apart from that, personal data will only be transferred by way of the transfer method that is legally stipulated.

ECOMAL only passes on personal data of the data subjects to third parties if:

- the person concerned has given his or her express consent (art.6 para.1 sent.1a) GDPR),
- this is necessary for the handling of contractual relationships or the implementation of the application process with the respective data subject (art.6 para.1 sent.1 b) GDPR),
- there is a legal obligation for the transfer (art.6 para.1 sent.1c) GDPR)
- the processing is necessary in order to protect vital interests of a data subject, an employee of a data subject or those of another natural person (art.6 para.1 sent.1d) GDPR)
- or the disclosure is necessary to protect the legitimate interest of ECOMAL or a third party, unless there is an overriding interest worthy of protection in the non-disclosure of the data of the respective data subject. The legitimate interest of ECOMAL is to maintain the efficiency and profitability of the company (art.6 para.1 sent.1f) GDPR).

### Duration of storage of personal data

The stored personal data of the respective person concerned is stored for the duration of the processing of the general contact request or the respective content request or for the processing of the contracts concluded with the person concerned or the execution of the application process. If the processing, the contractual relationship or the application process is terminated or if the person concerned makes use of the rights mentioned below, the data of the person concerned will be treated in accordance with the exercising of rights and, if necessary, deleted, unless longer retention periods are provided for by law.

The data that is collected for the purposes of advertising, making contact for the provision of information, the clarification of technical questions, invitations to trade fairs, the sending of sample components, the organisation / sending of newsletters and the holding of webinars will be stored until the data subject makes use of his rights mentioned below.

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As soon as legal retention periods have expired including, in particular, retention periods required under tax and commercial law, the personal data of the data subject will be deleted in any case.

### Transfer of data to a third country

ECOMAL may transfer personal information about the data subject to its parent company, Vishay Europe GmbH (hereinafter referred to as "Vishay"), or to companies affiliated with Vishay. At this juncture, ECOMAL cannot exclude the possibility that data may be transferred to other countries outside the European Union, especially the USA, and processed there. In the form of suitable guarantees as defined by art.46 para.1 GDPR, compliance with EU data protection regulations is guaranteed in the Framework Agreement of 1 April 2020 between Vishay and/or its affiliated companies and ECOMAL and its associated companies in Europe. The transfer of data will be carried out in accordance with art.46.para. 2 c GDPR, using standard data protection clauses adopted by the Commission in accordance with the examination procedure under art.93 para. 2 GDPR.

### The data subjects have the following data protection rights:

- **to revoke the consent given to ECOMAL at any time in accordance with art.7 para.3 GDPR.** As a result, data processing based on this consent may no longer be continued in the future.
- to request information concerning the personal data processed by ECOMAL in accordance with art.15 GDPR;
- to demand the correction of incorrect or incomplete personal data stored by ECOMAL without delay in accordance with art.16 GDPR;
- in accordance with Article 17 GDPR, to demand the deletion of personal data stored with ECOMAL, unless the processing is necessary to exercise the right to freedom of expression and information, to fulfil a legal obligation, for reasons of public interest or to assert, exercise or defend legal claims;
- to demand the restriction of the processing of personal data in accordance with art.18 GDPR under the conditions specified therein;
- to receive personal data provided to ECOMAL in a structured, common, and machine-readable format in accordance with art. 20 GDPR or to demand its transfer to another controller under the conditions specified therein and
- to complain to a **supervisory authority** in accordance with art.77 GDPR. The supervisory authority responsible for ECOMAL is either the State Commissioner for Data Protection of Baden-Württemberg, Königstraße 10 a, D-70173 Stuttgart, e-mail: [poststelle@lfdi.bwl.de](mailto:poststelle@lfdi.bwl.de), tel.: +49 (0)711 – 615541-0 or the respective national supervisory authority of the ECOMAL company that has published this data privacy information.

### Links to third party websites

ECOMAL's job vacancies can be accessed via the URL <https://ecomal.hr4you.org/>. These job offers each contain four clickable social media icons at the bottom of the page that take you to ECOMAL's corporate websites on social media channels, i.e. the following third-party websites:

- <https://www.xing.com/pages/ecomaleuropegmbh>
- <https://www.linkedin.com/company/ecomal-europe>
- [https://www.instagram.com/ecomal\\_europe/](https://www.instagram.com/ecomal_europe/)
- <https://www.kununu.com/de/ecomal-europe>

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The links are merely passive links – and thus not so-called “social media plugins”. By merely setting these passive links, no personal data is collected by (or transmitted to) the operators of the social platforms when the job offer is accessed.

Such data processing can only take place when the data subject clicks on the link, and is thus redirected to the corresponding external page, i.e. the respective social media profile.

ECOMAL has no exclusive influence on the content and data processing on these websites. The purpose and scope of the data collection, its further processing and the use of said data, as well as the relevant rights as data subjects and setting options for the protection of privacy, can be found in the data protection notices on the corresponding websites.

### **Right of objection:**

Insofar as ECOMAL bases the processing of personal data on the weighing of interests, the respective data subject may lodge an objection to the processing in accordance with art. 21 GDPR. In the event of such an objection, we request that you explain the reasons why ECOMAL should not process the personal data, as carried out by ECOMAL. In the event of a justified objection, ECOMAL will examine the situation and either stop or adapt the data processing or alternatively, show and prove to the respective data subject the compelling reasons for ECOMAL to continue the processing of data.

\*For reasons of easier readability, the wording is not gender-specific. The equal treatment of employees of any gender applies, regardless of the job title.