

## Data Privacy Statement

(in accordance with Articles 13 and 14 of the General Data Protection Regulation)  
for Customers and Business Partners

Your contractual partner is a member of the HOLTER Group and the data controller with responsibility for processing your data.

The HOLTER Group comprises Fritz Holter GmbH, Holter Großhandel GmbH, Holter Verwaltungs GmbH and Holter Heizung-Service GmbH, each with its registered office at Sengerstraße 27 in 4600 Wels, Austria, Gebäude- und Regeltechnik GmbH, with its registered office at F.-W.-Scherer-Straße 40 in 5020 Salzburg, Austria, and Holter Großhandel Deutschland GmbH, Am Schwindgraben 1, 93083 Obertraubling, Germany.

If you have any questions about this Data Privacy Policy or about data protection at HOLTER in general, please contact the Data Protection Officer of the HOLTER Group at [datenschutz@holter.at](mailto:datenschutz@holter.at).

As part of your business relationship with a member of the HOLTER Group, personal data of customers, interested parties, suppliers and other business partners and their employees are processed for the purpose of ordering and delivering products and services, sales activities, purchasing, accounting, customer support on the legal basis of a valid agreement or pre-contractual measures as well as for general marketing purposes on the legal basis of our legitimate interest in sending out direct advertising and on the basis of our legitimate interest in ensuring efficient business processes.

We process names, contact details, any agreements and the history of communication and orders.

The provision of the aforementioned data is necessary for the business relationship, as we would otherwise not be able to meet our contractual or statutory obligations.

If we are permitted to see you on HOLTER's premises, we shall process your name, contact details, company membership and function; we shall do so in the legitimate interest of maintaining good customer relations, to coordinate an appointment with you and so that we can welcome you on a monitor in the entrance area.

Unless you give your consent, we shall, in principle, not disclose these data to third parties, unless such disclosure is required by law or unless it is necessary for the fulfilment of contractual obligations (e.g. data transfer to logistics partners or shipping companies to carry out deliveries or data transfer to payment service providers to carry out bank transfers). Another exception is data disclosure to processors who work

exclusively on the instruction of HOLTER, do not use the data for their own purposes and are bound by their own agreements to data protection obligations specified in the General Data Protection Regulation.

In some cases, data may also be transferred to non-EU countries. To safeguard the rights and freedoms of data subjects, agreements have been concluded in accordance with the standard contractual clauses (GDPR Article 46) approved by the EU Commission, and additional contractual obligations have been undertaken to ensure a data protection level that is equivalent to data protection within the EU.

Once the statutory retention period has lapsed, data are stored for no more than 5 years from the last time we had contact with you. You have a right of data access, rectification and erasure of data as well as a right to restriction of processing, a right to object to processing (concerning, in particular, the sending of direct advertising) and a right to data portability to a different controller. You are entitled to lodge a complaint with a supervisory authority.

## **Data Privacy Policy for Participation in Online Meetings and Video Conferences on Microsoft Teams**

When carrying out online meetings and video conferences, we process personal data in the form of contact details as well as video and audio data. Such processing is necessary for the fulfilment of contractual obligations and pre-contractual measures (e.g. employees' employment contracts, preliminary project meetings), unless it is possible to make efficient use of other, less stringent measures, and shall only continue for the duration of the relevant meeting.

Any data concerning your participation in online meetings and any text entered by participants in the chat window of the meeting shall be deleted upon the expiration of the statutory retention periods (generally seven years).

In exceptional cases, we shall make a recording of the online meeting for the purpose of documentation, quality control or drawing up minutes. This is done either to meet contractual obligations or to satisfy HOLTER's legitimate interest in the aforementioned processing purposes and not until all attending participants have been notified. You have a right to object if you are in a specific situation where your rights and freedoms override HOLTER's interests. Recordings shall only be stored until the relevant processing purpose has been completed, e.g. the creation and confirmation of minutes.

Data processed while carrying out online meetings shall, in principle, not be disclosed without your consent. An exception, however, shall be made for data disclosure to processors if they work exclusively on the instruction of HOLTER, do not use the data for their own purposes and are bound by their own agreements to comply with the data protection obligations under the General Data Protection Regulation, and an exception is also made for the disclosure of diagnostic and telemetric data to Microsoft Ireland Operations Ltd., One Microsoft Place, Dublin, D18 P521, Ireland, where such disclosure is required for the operation and safeguarding of the infrastructure of an online meeting, which may also, in principle, include the disclosure of

personal data. In rare cases, data may also be transferred to non-EU countries. To safeguard the rights and freedoms of data subjects, we have concluded an agreement with Microsoft in accordance with the standard contractual clauses (GDPR Article 46) approved by the EU Commission, and additional contractual obligations have been undertaken by Microsoft to ensure a data protection level that is equivalent to data protection within the EU.

You have a right of data access, rectification and erasure of data as well as a right to restriction of processing and a right to object to processing. You are entitled to lodge a complaint with a supervisory authority. As you have applied for employment with a member of the HOLTER Group, this member will be the data controller with responsibility for processing your data. The HOLTER Group comprises Fritz Holter GmbH, Holter Großhandel GmbH, Holter Verwaltungs GmbH and Holter Heizung-Service GmbH, each with its registered office at Sengerstraße 27 in 4600 Wels, Austria, Gebäude- und Regeltechnik GmbH, with its registered office at F.-W.-Scherer-Straße 40 in 5020 Salzburg, Austria, and Holter Großhandel Deutschland GmbH, Am Schwindgraben 1, 93083 Obertraubling, Germany.

HOLTER processes personal data for the purpose of selecting job applicants. This information includes general contact details (name, address, phone number, etc.), any certificates, qualification documents and notes taken at a job interview. Any access to an extract from the criminal records register is recorded, but the details of the extract are not stored.

As part of the apprentice talent check, an additional test is carried out, testing cognitive abilities and general knowledge. The results of such tests serve as additional information for the next stages in the application process.

The aforementioned data are processed on the legal basis of pre-contractual measures and are necessary for processing purposes.

The data shall, in principle, not be disclosed to third parties, unless such disclosure is a statutory requirement or necessary for the purpose of data processing. Data may also be disclosed to processors who work exclusively on the instruction of HOLTER, do not use the data for their own purposes and are bound by their own agreements to data protection obligations specified in the General Data Protection Regulation.

HOLTER shall, in principle, endeavour to process all personal data within the European Union or in countries which are certified by the EU Commission as having an equivalent level of data protection. Where necessary, HOLTER will conclude additional agreements, in particular with IT system providers, which it shall do in accordance with GDPR Article 46 ("standard contractual clauses"), while also ensuring additional contractual and technical data protection measures. In addition, data may be transferred to a third country if you give your consent (GDPR Article 49.1(a)) or if this is necessary for the fulfilment of an agreement with you (GDPR Article 49.1(b)).



After the selection of job applicants has been completed, we will retain your data for a further six months on the legal basis of our legitimate interest in asserting or defending legal claims. We shall only retain your application documents for a longer period of up to three years if you have given your express consent. In such a case, we shall ask you to provide your written consent to such record keeping, which you may revoke at any time in writing, including by email.

You have a right of data access, rectification and erasure of data as well as a right to restriction of processing, a right to object to processing and a right to data portability to a different controller. You are entitled to lodge a complaint with a supervisory authority.

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