

Data Protection Notice for Customers and Potential Customers

Protecting your privacy is an important matter for the GBA Group. We process personal information confidentially and only in accordance with legal regulations.

In the following, we would like to provide you with information about the personal data that we collect during our cooperation with each other and how that data is processed.

Who is responsible for the data processing?

The individual contractual partner within the GBA Group is responsible for processing your data. The central contact is GBA Holding GmbH, Goldtschmidtstraße 5, 21073 Hamburg, Germany, represented by Steffen Walter, Mark Piekereit, Torben Giese, Alexander Kleinke, Ralf Murzen.

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Fax: +49 40 / 797172 - 27
gba-group@gba-group.de

Further contact details for all companies in the GBA Group can be found at <https://www.gba-group.com/kontakt-uebersicht>.

You can contact the data protection officer responsible for the respective company at datenschutz@gba-group.de or by mail at the above address, adding "Data Protection Officer" to the address. You will also find an overview of the individual contact persons [here](#).

Why is personal data processed and what is the legal basis for it?

We process personal data of our business contacts (in particular employees of customers, suppliers, and other business partners) for the following purposes:

- Initiation, implementation, and processing of business relationships
- Communication by email, telephone, post, or other means of communication
- Contract management, offer and order processing, invoicing
- Maintenance of business relationships
- Fulfilment of legal obligations, in particular commercial and tax law retention obligations

The legal bases for processing are:

- Art. 6 (1) (b) GDPR (contract or pre-contractual measures), provided that the contractual partner is a natural person
- Art. 6 (1) (f) GDPR (legitimate interests such as economic interests, efficient communication, and business transactions). This also includes the billing of our services, which may also involve the sale of receivables on the basis of the legitimate interest of efficient claim management in accordance with Art. 6 (1) (f) GDPR.
- Art. 6 (1) (c) GDPR (legal obligations, e.g., retention obligations)

As a company of the GBA Group, we also process your data for internal administrative purposes in a central location on the basis of our legitimate interest pursuant to Art. 6 (1) lit. f in conjunction with EWG 48 GDPR.

In addition, consent—which can be revoked at any time—may also be the legal basis for the processing of your personal data.

If you use our customer portal GBA Connect to view your analysis results, this is done with your consent in accordance with Art. 6 (1) (a) GDPR. You have the right to revoke this consent at any time without affecting the legality of the processing carried out on the basis of the consent until revocation.

If we process your data for purposes other than those mentioned here, you will be informed separately in advance.

We usually receive the data directly from the business contact concerned or from their employer. In individual cases, data may come from publicly available sources (e.g., websites, commercial registers).

In particular, we process the following data:

- Names, business contact details (email, telephone number, address)
- Function/position in the company
- Company affiliation
- Contract and communication content
- Billing, payment, and delivery data
- Other data provided in the course of business transactions

Is it necessary for you to provide your data?

Within the scope of the business relationship, the data required for the initiation, implementation, and processing of the business relationship must be provided. Without this data, cooperation may not be possible.

Registration on the GBA Connect customer portal is not required to conclude a contract. However, if you wish to use the service, you must provide the required personal data.

How long is the data stored?

Personal data is stored:

- for as long as it is necessary to conduct the business relationship,
- and beyond that in accordance with statutory retention obligations (usually 6 to 10 years according to the German Commercial Code (HGB)/German Fiscal Code (AO)).

Communication data that is not relevant to business is deleted regularly.

Who receives the data?

Within the company as well as in the GBA Group, on principle, only those individuals who are entrusted with processing your inquiries and orders have access to your personal data.

External recipients may include:

- IT service providers (e.g., hosting, software, communication systems)
- Tax advisors, auditors, or legal advisors
- Banks and payment service providers
- Logistics and shipping service providers
- Authorities within the scope of legal obligations

No data will be passed on to third parties for advertising purposes.

We have entered data processing agreements with our service providers, which ensure that the data is processed exclusively according to our instructions and in a permissible way.

Where is the data processed?

Data will only be transferred to countries outside the EU/EEA if:

- this is necessary for the fulfillment of the contract,
- we use service providers who offer appropriate safeguards in accordance with Art. 46 GDPR (e.g., EU standard contractual clauses), or
- there is a legal obligation to do so.

Your Rights as a Data Subject

You have the right to obtain information about your personal data that we process.

Furthermore, you have the right to have your personal data rectified or erased, or to restrict how this data is processed or its transferability, to the extent that you are entitled to do so by law.

In accordance with GDPR Art. 21 par. 1 sentence 1, as a data subject, you have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data, provided that this processing is carried out on the legal basis of Article 6, par. 1 (f), (legitimate interest). Please address your objections to datenschutz@gba-group.de.

You also have the right to submit a complaint to the relevant supervisory authority if you see reason to do so. For us, the supervisory authority in Hamburg is responsible, which can be reached at: <https://datenschutz-hamburg.de/>

Contact Information

If you want to exercise your rights as a data subject or if you have other questions regarding data protection at the GBA Group, then please contact our data protection team at: datenschutz@gba-group.de. In this context, especially when exercising your rights as a data subject, we ask you for your understanding that we may ask you to verify that you are in fact the person who you claim to be.

Automated decision-making/profiling

We do not use automated decision-making or profiling.