

## Website Privacy Policy

Data protection and the security of your personal data are important to us and we implement appropriate technical and organisational measures to protect personal data that is subject to our access.

We, the Controller, (also referred to as “[Controller]”; “we”; “us”; or “our”), would like to inform you below about the type and extent of the processing of personal data when you visit and use our website.

This Policy also contains information about your data protection rights, including a right to object to some of the processing which Landbell carries out. More information about your rights, and how to exercise them, is set out in the “Your Rights” section.

### 1 Controller (the responsible person)

European Recycling Platform (ERP) Austria GmbH

Rennweg 9 | 1030 Wien | Österreich

Telefon: +43 (0) 1 235 01 40 - 10

E-Mail: [austria@erp-recycling.org](mailto:austria@erp-recycling.org)  
[dataprivacy@landbellgroup.com](mailto:dataprivacy@landbellgroup.com)

If you have any questions regarding data protection, or want to exercise one of your rights (see clause 5 hereafter) or to lodge a complaint, our data protection officer (DPO) will be happy to assist you: [datenschutz@landbell.de](mailto:datenschutz@landbell.de)

### 2 Data we collect and process via this website, the purposes of processing and legal bases

#### Only by using our website

Your visit to our website will be logged. Initially, the following automatic logging data, which your browser transmits to us, is mainly recorded:

- the IP address currently used by your PC or router
- date and time of request (including Time zone difference to Greenwich Mean Time (GMT))
- browser type, version and language
- operating system of your PC
- the pages you are viewing
- Access status/HTTP status code
- name and size of the requested file(s)
- and, if applicable, the URL of the referring web page.

This data is only collected for data security purposes, to improve our website and for error analysis. As we pursue our legitimate business interests when processing your personal data for these purposes, we rely on the basis of Art. 6 par. 1 lit f) GDPR for doing this.

#### If you are submitting any job applications

Please refer to the Applicants Privacy Notice available on our website.

#### If you are using our webportals

To report „Mengenstrom“ and packaging amounts we have our webportals in place. You need to check in regularly by using your username or e-mail address as well as your password. This requires registration via a registration form, where you need to input the name of your company, postal address and a person to contact as well as the contact’s e-mail address. The information you entered will only be used for this specific purpose. This Data processing is based on Art 6 par.1 lit b) GDPR, as the processing is necessary for the performance of a contract to which you are party or in order to take steps at the request of you prior to entering into a contract with us.

#### If you are using our Contact Form or if you are registered in our contact list

Personal data (e.g. your name, address data or contact data) that you voluntarily provide to us, e.g. in the context of an enquiry by e-mail to the contact persons named on our homepage, or that has been made available to us by other means and you have confirmed that we may process for the specified purposes, is stored with us and processed only for correspondence with you and only for the purpose for which you have made this data available to us. Therefore, we may use your information to provide products and services you have requested, if any, (Art. 6 par. 1 lit. b) GDPR). We may also process your data for responding to any comments or complaints you may send us or send you information on products and services provided by us, our affiliates and carefully selected partners. As all this is required by us to conduct our business and pursue our legitimate interest, we base the respective processings on Art. 6 par. 1 lit f) GDPR. In respect to the sending of direct marketing communication, you have the right to object to such processing. Please find further information on this right in the “Your rights” section below.

If you give us your consent, we may process your data based on Art 6 par. 1 lit a) GDPR for performing direct marketing via email or telephone in relation to our relevant products and services, or other products and services provided by us or our affiliates.

#### If you are registering on our website

You can register on our website to use additional features on the site (e.g. for using our webportal as described above). We only use the data entered for the purpose of using the respective offer or service for which you have registered. The mandatory information requested during registration is marked with an asterisk under the data field and must be given in full. Otherwise, we will reject the registration. For

important changes, such as the scope of the offer or for technical changes, we use the e-mail address specified during registration to inform you in this way. The processing of the data entered during registration takes place on the basis of Art. 6 par. 1 lit. f) GDPR, as the processing is necessary for pursuing our legitimate business interest in providing the additional services available for our registered users.

#### **If you are subscribing to our Newsletter**

We offer you the possibility to subscribe to our newsletter via our homepage. We will only send you our newsletter if you consent us to do so, the respective data processing is based on Art. 6 par. 1 a) GDPR. To subscribe we need at least your e-mail address. To ensure that the Newsletter was requested by you or from your e-mail address, you will first receive a confirmation e-mail. Only when you click on the activation link will you be added to our e-mail distribution list and receive the newsletter. The subscription to the newsletter is logged for verification purposes (IP address, date, time). You can unsubscribe from the newsletter at any time by contacting us directly or by notifying us using the link at the end of each newsletter.

#### **Google Analytics**

We use Google Analytics on our website. This is a web analytics service provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043 (hereinafter: Google). Through certification according to the EU-US Privacy Shield <https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>.

Google guarantees that it will follow the EU's data protection regulations when processing data in the United States. The Google Analytics service is used to analyze how our website is used. The legal basis is Art. 6 Para. 1 lit. f) GDPR. Our legitimate interest lies in the analysis, optimization, and economic operation of our site. Usage and user-related information, such as IP address, place, time, or frequency of your visits to our website will be transmitted to a Google server in the United States and stored there. However, we use Google Analytics with the so-called anonymization function, whereby Google truncates the IP address within the EU or the EEA before it is transmitted to the US. The data collected in this way is in turn used by Google to provide us with an evaluation of visits to our website and what visitors do once there. This data can also be used to provide other services related to the use of our website and of the internet in general. Google states that it will not connect your IP address to other data. In addition, Google provides further information with regard to its data protection practices at <https://www.google.com/intl/de/policies/privacy/partners>, including options you can exercise to prevent such use of your data.

In addition, Google offers an opt-out add-on at <https://tools.google.com/dlpage/gaoptout?hl=en> in addition with further information. This add-on can be installed on the most popular browsers and offers you further control over the data that Google collects when you visit our website. The add-on informs Google Analytics' JavaScript (ga.js) that no information about the website visit should be transmitted to Google Analytics. However, this does not prevent information from being transmitted to us or to other web analytics services we may use as detailed herein. Alternatively, you can disable the future analysis of your website visit by Google Analytics, by "clicking" on the link below. By clicking on the link, a so-called "opt-out cookie" is configured, which means that the analysis of your visit to our site will be prevented in the future: disable Google Analytics. Please note that if you delete the cookies in your browser settings, this may also delete the opt-out cookie and its re-activation may become necessary.

#### **Google reCAPTCHA**

Our website uses Google reCAPTCHA to check and prevent automated servers ("bots") from accessing and interacting with our website. This is a service provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043 (hereinafter: Google). Through certification according to the EU-US Privacy Shield <https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>

Google guarantees that it will follow the EU's data protection regulations when processing data in the United States. This service allows Google to determine from which website your request has been sent and from which IP address the reCAPTCHA input box has been used. In addition to your IP address, Google may collect other information necessary to provide and guarantee this service. The legal basis is Art. 6 Para. 1 lit. f) GDPR. Our legitimate interest lies in the security of our website and in the prevention of unwanted, automated access in the form of spam or similar. Google offers detailed information at <https://policies.google.com/privacy> concerning the general handling of your user data.

### **3 Cookies**

We also use so-called cookies in our internet offer (which may also be provided by third parties). Cookies are small text files that are saved by your browser and stored on your computer. The use of cookies serves to make the website more user-friendly. For example, it is possible to recognise the user for the duration of the session without having to constantly enter a new user name and password. The cookies do not cause any damage to your computer and are generally deleted at the end of your session, unless they are so called permanent cookies. To find out more about the different kinds of cookies we use, the legal bases we rely in such use and the different ways you can deactivate cookies, please refer to our Cookie Policy.

#### 4 Recipients of personal data

Your personal data may be shared with other entities of the Landbell Group when insofar as answering your question or providing you the service you requested requires the involvement of other group entities. Except from the Landbell Group, we will only be passed on to third parties if it is necessary for the execution of a contract and/or its technical processing, which regarding the website, includes our suppliers in charge of processing your data for the dispatch of the newsletter and for the hosting and maintenance of our website. When we subcontract such activities, we make sure your data is managed in compliance with the GDPR rules and this includes, where information is transferred outside the EEA, and where this is to a stakeholder or vendor in a country that is not subject to an adequacy decision by the EU Commission, that data is adequately protected by EU Commission approved standard contractual clauses, an appropriate [Privacy Shield](#) certification or a vendor's Processor Binding Corporate Rules.

#### 5 Your rights

According to Art. 15-21 GDPR you can assert the following rights with regard to the personal data processed by us if the conditions described there are met.

5.1 **Right to access** (Art. 15 GDPR). You have the right to be informed about the personal data concerning you that is processed by us and be provided with a copy of your personal data we hold about you.

5.2 **Right to rectification** (Art. 16 GDPR). You may request the rectification of inaccurate personal data, or to complete personal data when it is incomplete.

5.3 **Right to erasure** (Art. 17 GDPR). You may be entitled to ask for the deletion of personal data concerning you, in particular if one of the following reasons exists:

- Your personal data are no longer necessary for the purposes for which they were collected or otherwise processed.
- You revoke your consent on which the processing of your data is based.
- You have asserted a right to object to the processing and there are no overriding legitimate grounds for the processing, or you asserted your right to object where your personal data is processed for direct marketing purposes.
- Your data has been processed unlawfully.

However, the right to deletion does not exist if this conflicts with the legitimate interests of the responsible party. These could be e.g.:

- if personal data is required to assert, exercise or defend legal claims.
- if deletion is not possible due to storage obligations.

If data cannot be deleted, however, there may be a right to restrict processing (see below).

5.4 **Right to restriction of processing** (Art. 18 GDPR). You have the right to request us to restrict the processing of your personal data under following circumstances:

- you contest the accuracy of your personal data and we therefore verify the accuracy of your personal data for a period,
- the processing is unlawful and you oppose the erasure of your personal data and instead request the restriction of their use,
- we no longer need the data, but you do need it to establish, exercise or defend legal claims,
- you have objected to the processing of your data pursuant to Art. 21 par. 1 GDPR and it is not yet clear whether our legitimate grounds override those of yours.

5.5 **Right to data portability** (Art. 20 GDPR). You have the right to receive the personal data concerning you that you have provided to us in a structured, commonly used and machine-readable format and you have the right to transmit this data to another controller without our interference, provided that the processing is based on your consent (e.g. Art. 6 par. 1 lit a) GDPR) or a contract (Art. 6 par. 1 lit b) GDPR) and the processing is carried out by us with the help of automated means.

5.6 **Right to object** (Art. 21 GDPR). You have the right to object at any time to the processing of personal data relating to you on the basis of Art. 6 par. 1 e) or f) GDPR for reasons arising from his particular situation, including profiling based on those provisions. Where your personal data is processed for direct marketing purposes without your consent and based on our legitimate interests, you have the absolute right to object at any time to processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing (Art. 21 par. 2 GDPR). The respective personal data will no longer be processed for direct marketing purposes then.

5.7 **Right to revoke consent** (Art. 7 par. 3 GDPR). If you have consented to the processing of your personal data by us, you have the right to revoke your consent at any time. The legality of processing your personal data before revocation remains unaffected. We may further process such data pursuant to another applicable legal basis, e.g. for the fulfilment of our legal obligations.

5.8 **Right to lodge a complaint with a supervisory authority** (Art. 77 GDPR). If you have not received an answer after a reasonable period of time from the DPO, or have received an answer which is incomplete or unsatisfactory in your view, you shall have the right to

lodge a complaint with a supervisory authority, in accordance with Art. 77 GDPR, if you consider that the processing of personal data relating to you infringes the GDPR. Such complaint may be lodged in particular with the supervisory authority in the Member State of your habitual residence, place of work or place of the alleged infringement.

**Questions and how to assert your rights.** If you have any questions regarding data protection, or want to exercise one of your rights or to lodge a complaint we will be happy to assist you: [dataprivacy@landbellgroup.com](mailto:dataprivacy@landbellgroup.com)

## **6 Standard periods for the deletion of data**

6.1 If a legal regulation for the retention of data does not exist, the data will be deleted or destroyed if they are no longer necessary to achieve the above described purposes of data processings. Different periods apply to the storage of personal data, for instance due to tax law or according to some commercial law regulations. Finally, the storage period can also be based on the statutory limitation periods according to the respective applicable national laws.

6.2 The data collected during registration will be stored by us as long as you are registered on our website and will subsequently be deleted 3 years after this, beginning with end of the respective year.

6.3 Where we process personal data for marketing purposes or with your consent, we process the data until you ask us to stop and for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data indefinitely so that we can respect your request in future.

6.4 Where we process personal data for site security purposes, we retain it for 12 months.

6.5 Where we process personal data in connection with performing a contract, we keep the data as required according to the statutory retention period.

## **7 Changes to this Data Privacy Statement**

We reserve the right to modify and amend this Privacy Policy from time to time to reflect current circumstances. We therefore recommend that you review this Privacy Policy / Data Privacy Statement regularly to keep up to date. Where required by law, we may also inform you about modifications/amendments of this Privacy Policy. This Data Privacy Statement was last updated on May 17, 2019.