

Privacy Notices for Digital Visitor Registration

Information pursuant to Article 13 GDPR

Below, we inform you about the collection and processing of personal data in the context of digital visitor registration.

1. Controller and Data Protection Officer

The controller within the meaning of Article 4(7) GDPR and the externally appointed Data Protection Officer can be contacted as follows:

Controller: Sundwiger Messingwerk GmbH Hönnetalstr. 110 58675 Hemer Deutschland E-Mail: datenschutz-smw@sundwiger-mw.com Telefon: +49 2372 6610	Data Protection Officer: ADICOM Systems GmbH Herr Christian Scobel Schwitter Weg 75 58706 Menden E-Mail: dsb@adicom-systems.de Telefon: +49 2373 170 678-13
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2. Purposes of data processing

Your personal data is processed for the following purposes:

- Organisation, execution and documentation of visitor registration and visitor management
- Administration of contact persons and visiting times
- Control and traceability of attendance and access to the company
- Execution and documentation of safety briefings
- Ensuring company security, accident prevention and the protection of employees, visitors and company assets
- Compliance with statutory proof, documentation and retention obligations
- Organisational simplification of future visitor registrations where voluntary consent has been given

3. Categories of personal data processed

The following personal data is processed as part of visitor registration:

- First name
- Last name
- Employer / company
- Vehicle registration number
- Date and time of entry/exit
- Date of the last training

4. Legal bases for processing

Your personal data is processed on the basis of:

a) Protection of legitimate interests pursuant to Article 6(1)(f) GDPR

Visitor and access data is processed to protect our legitimate interests. These interests include in particular:

- Ensuring access control
- Maintaining company security
- Protection of employees, visitors as well as trade and business secrets
- Traceability of access in security or damage cases

b) Compliance with legal obligations pursuant to Article 6(1)(c) GDPR

Personal data is processed for the execution and documentation of safety briefings. Where statutory or other legal retention, proof or documentation obligations exist, processing is also carried out to comply with legal obligations pursuant to Article 6(1)(c) GDPR. The corresponding obligations arise in particular from Section 8 of the German Occupational Safety and Health Act (ArbSchG) and DGUV Information 215-830, Chapter 3.9.

c) Consent pursuant to Article 6(1)(a) GDPR for the processing of personal data with Microsoft Power Apps, Microsoft PowerAutomate and Microsoft SharePoint

As part of digital visitor registration, personal data of external visitors is processed using Microsoft Power Apps, Microsoft PowerAutomate and Microsoft SharePoint.

The Microsoft services used are operated under an existing data processing agreement pursuant to Article 28 GDPR. Processing may also take place in data centres within the European Union and, where technically necessary, in compliance with the legal requirements for transfers to third countries.

The consent includes the storage of the following data:

- First name
- Last name
- Employer / company
- Vehicle registration number
- Date and time of entry/exit
- Date of the last training

Granting consent is voluntary and may be withdrawn at any time with effect for the future.

d) Consent pursuant to Article 6(1)(a) GDPR for simplified future visitor registration

If you wish to use the optional function for simplified future visitor registration, your data will be stored beyond the respective visit on the basis of your voluntary consent.

The consent includes the storage of the following data for reuse during future visits:

- First name
- Last name
- Employer / company
- Vehicle registration number
- Date and time of entry/exit
- Date of the last training

Granting consent is voluntary and may be withdrawn at any time with effect for the future.

5. Storage period

Your personal data will be stored only for as long as this is necessary for the purposes stated or statutory retention periods exist, in these cases for at least 2 years. The printed visitor passes are destroyed after no more than 3 months. Storage is carried out in accordance with the applicable statutory retention and proof obligations.

Data stored on the basis of consent for simplified future visitor registration will remain stored until you withdraw your consent, unless statutory retention obligations prevent deletion.

6. Recipients of the data

Within our company, only those departments that require your personal data for carrying out visitor registration and maintaining company security will have access to it.

Data is transferred to external service providers only if this is necessary for the operation of digital visitor registration and corresponding data protection agreements are in place.

As part of visitor registration, KME S.r.l. acts as an external service provider with whom a data processing agreement pursuant to Article 28 GDPR has been concluded.

Disclosure to other third parties takes place only where there is a legal obligation to do so.

We implement appropriate technical and organisational measures to ensure the protection of personal data so that your data is protected against accidental or intentional manipulation, partial or complete loss, destruction or unauthorised access by third parties. Our security measures are regularly reviewed for their effectiveness and adapted to the current state of the art.

7. Obligation to provide data

Providing your personal data is necessary for carrying out visitor registration and for access to the company premises.

Access cannot be granted without providing the required data.

Consent to store the data for future visits, however, is voluntary.

8. Rights of data subjects

Within the framework of the statutory requirements, you have the following rights:

- Right of access pursuant to Article 15 GDPR
- Right to rectification pursuant to Article 16 GDPR
- Right to erasure pursuant to Article 17 GDPR
- Right to restriction of processing pursuant to Article 18 GDPR
- Right to data portability pursuant to Article 20 GDPR
- Right to object to processing pursuant to Article 21 GDPR
- Right to withdraw consent granted with effect for the future
- Right to lodge a complaint with a data protection supervisory authority pursuant to Article 77 GDPR

9. Withdrawal of consent

Consent granted for the storage of your data for future visitor registrations may be withdrawn at any time with effect for the future.

The withdrawal may be addressed to our company using the contact details above.

The lawfulness of processing carried out up to the time of withdrawal remains unaffected.

10. Automated decision-making

Automated decision-making, including profiling pursuant to Article 22 GDPR, does not take place.

11. Declaration of consent for digital visitor registration for the processing of personal data with Microsoft Power Apps, Microsoft PowerAutomate and Microsoft SharePoint

Voluntary consent

I consent to Sundwiger Messingwerk GmbH processing my following personal data:

- First name
- Last name
- Employer / company
- Vehicle registration number
- Date and time of entry/exit
- Date of the last training

for the purpose of carrying out visitor registration, access control and ensuring company security using Microsoft Power Apps, Microsoft PowerAutomate and Microsoft SharePoint.

I am aware that:

- the consent is voluntary
- my data is required for carrying out the visit and my data will be used exclusively for the purposes listed. It will not be passed on to unauthorised third parties.
- I may withdraw my consent at any time with effect for the future
- the lawfulness of processing carried out up to the time of withdrawal remains unaffected

12. Declaration of consent for simplified visitor registration (optional)

Voluntary consent

I consent to Sundwiger Messingwerk GmbH processing my following personal data:

- First name
- Last name
- Employer / company
- Vehicle registration number
- Date and time of entry/exit
- Date of the last training

for the purpose of simplified future visitor registration and reused during later visits.

I am aware that:

- the consent is voluntary
- my data will be used exclusively for the purposes listed and will not be passed on to unauthorised third parties.
- I may withdraw my consent at any time with effect for the future
- the lawfulness of processing carried out up to the time of withdrawal remains unaffected

These Privacy Notices can be reviewed at the portal or by visiting our website at:
<https://www.sundwiger-mw.com/datenschutzerklaerung/visitors>