

## Data protection

We are very pleased about your interest in our company. Data protection is of particular importance for the management of Tradelink International GmbH. A use of the internet pages of Tradelink International GmbH is basically possible without any indication of personal data. However, if a data subject wishes to use our company's special services through our website, personal data processing may be required. If the processing of personal data is required and there is no legal basis for such processing, we generally seek the consent of the data subject.

The processing of personal data, such as the name, address, e-mail address or telephone number of a data subject, is always in accordance with the General Data Protection Regulation and in accordance with the country-specific data protection provisions applicable to Tradelink International GmbH. Through this privacy policy, our company seeks to inform the public about the nature, scope and purpose of the personal information we collect, use and process. Furthermore, data subjects are informed of their rights under this privacy policy.

Tradelink International GmbH, as controller, has implemented numerous technical and organizational measures to ensure the most complete protection possible for personal data processed via this website. Nevertheless, Internet-based data transmissions can generally have security holes, so that absolute protection can not be guaranteed. For this reason, every person concerned is free to submit personal data to us by alternative means, for example by telephone.

### 1. Definitions

The data privacy statement of Tradelink International GmbH is based on the terminology used by the European directive and regulatory authority in the adoption of the General Data Protection Regulation (DS-GVO). Our privacy policy should be easy to read and understand, both for the public and for our customers and business partners. To ensure this, we would like to explain in advance the terminology used.

Among other things, we use the following terms in this privacy policy:

#### a) Personal data

Personal data means any information relating to an identified or identifiable natural person (hereinafter the "data subject"). A natural person is considered to be identifiable, directly or indirectly, in particular by association with an identifier such as a name, with an identification number, with location data, with an online identifier or with one or more special characteristics expressing the physical, physiological, genetic, mental, economic, cultural or social identity of this natural person can be identified.

#### b) The person concerned

Affected person is any identified or identifiable natural person whose personal data is processed by the controller.

#### c) Processing

Processing means any process or series of operations related to personal data, such as collecting, capturing, organizing, organizing, storing, adapting or modifying, reading out, querying, using, with or without the aid of automated procedures; disclosure through submission, dissemination or any other form of provision, reconciliation or association, restriction, erasure or destruction.

#### d) Restriction of processing

Restriction of the processing is the marking of stored personal data with the aim to limit their future processing.

e) Profiling

Profiling is any type of automated processing of personal data that involves the use of such personal information to evaluate certain personal aspects relating to a natural person, in particular aspects relating to job performance, economic situation, health, personal To analyze or predict preferences, interests, reliability, behavior, whereabouts, or relocation of that natural person.

f) Pseudonymisation

Pseudonymisation is the processing of personal data in such a way that personal data can no longer be assigned to a specific data subject without additional information, provided that such additional information is kept separate and subject to technical and organizational measures to ensure that the personal data not assigned to an identified or identifiable natural person.

g) Responsible or data controller

The controller or controller is the natural or legal person, public authority, body or body that, alone or in concert with others, decides on the purposes and means of processing personal data. Where the purposes and means of such processing are determined by Union law or the law of the Member States, the controller or the specific criteria for his designation may be provided for under Union or national law.

h) Processor

A processor is a natural or legal person, public authority, body or body that processes personal data on behalf of the controller.

i) Receiver

Recipient is a natural or legal person, agency, agency or other entity to whom Personal Data is disclosed, whether or not it is a third party. However, authorities which may receive personal data under Union or national law in connection with a particular mission are not considered to be beneficiaries.

j) Third parties

Third is a natural or legal person, public authority, body or body other than the data subject, the controller, the processor and the persons authorized under the direct responsibility of the controller or processor to process the personal data.

k) Consent

Consent is any expression of will voluntarily and unequivocally made by the data subject in the form of a statement or other unambiguous confirmatory act expressing to the data subject that they consent to the processing of the personal data concerning them is.

## 2. Name and address of the controller

The person responsible within the meaning of the General Data Protection Regulation, other data protection laws in the Member States of the European Union and other provisions with a data protection character is:

Tradelink International GmbH  
Industriepark Griesheim  
Building 2006, Stroofstr.27  
D - 65933 Frankfurt am Main  
Tel. + 49 (0) 69 40 95 09 62  
E-Mail: [info@tradelink-international.de](mailto:info@tradelink-international.de),  
Website: [tradelink-international.de](http://tradelink-international.de)

### 3. Collecting general data and information

The website of tradelink Internatinal GmbH collects a series of general data and information every time the website is accessed by an affected person or an automated system. This general data and information is stored in the log files of the server. The (1) browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system accesses our website (so-called referrers), (4) the sub-web pages, which can be accessed via (5) the date and time of access to the website, (6) an Internet Protocol (IP) address, (7) the Internet service provider of the accessing system and (8) other similar data and information used in the event of attacks on our information technology systems.

When using this general data and information, the Tradelink International GmbH does not draw any conclusions about the person concerned. Rather, this information is required in order to (1) correctly deliver the contents of our website, (2) to optimize the content of our website and to advertise it, (3) to ensure the continued functioning of our information technology systems and the technology of our website, and (4) to provide law enforcement authorities with the necessary information for prosecution in case of a cyberattack. This anonymously collected data and information are statistically and further evaluated by Tradelink International GmbH with the aim of increasing data protection and data security in our company in order to ultimately ensure the best possible level of protection for the personal data processed by us. The anonymous data of the server log files are stored separately from all personal data provided by an affected person.

### 4. Routine deletion and blocking of personal data

The controller shall process and store the personal data of the data subject only for the period necessary to achieve the purpose of the storage or, if so required by the European legislature and other legislators in laws or regulations, that of the controller subject to was provided.

If the storage purpose is omitted or if a storage period prescribed by the European directives and regulations or any other relevant legislature expires, the personal data will be routinely blocked or deleted in accordance with the statutory provisions.

### 5. Rights of the person concerned

#### a) Right to confirmation

Each data subject has the right, as granted by the European Directive and Regulatory Authority, to require the controller to confirm whether personal data relating to him / her is being processed. If an affected person wishes to exercise this right of confirmation, they can contact an employee of the controller at any time.

#### b) Right to information

Any person affected by the processing of personal data shall have the right granted by the European legislature and the legislature at any time to obtain from the controller information free of charge concerning the personal data stored about him and a copy of that information. In addition, the European legislator and regulator has provided the data subject with the following information:

the processing purposes

the categories of personal data being processed

the recipients or categories of recipients to whom the personal data have been disclosed or are still being disclosed, in particular to recipients in third countries or to international organizations

if possible, the planned duration for which the personal data will be stored or, if that is not possible,

the criteria for determining that duration

the existence of a right to rectification or erasure of the personal data concerning them, or to the limitation of the processing by the controller or a right to object to such processing

the existence of a right of appeal to a supervisory authority

if the personal data are not collected from the data subject: All available information about the origin of the data

the existence of automated decision-making including profiling in accordance with Article 22 (1) and (4) of the GDPR and - at least in these cases - meaningful information about the logic involved and the scope and intended impact of such processing on the data subject

Furthermore, the data subject has a right of access as to whether personal data has been transmitted to a third country or to an international organization. If this is the case, then the data subject has the right to obtain information about the appropriate guarantees in connection with the transfer.

If a data subject wishes to avail himself of this right to information, he may, at any time, contact an employee of the controller.

#### c) Right to rectification

Any person affected by the processing of personal data has the right granted by the European directive and regulatory authority to demand the immediate correction of incorrect personal data concerning them. Furthermore, the data subject has the right to request the completion of incomplete personal data, including by means of a supplementary declaration, taking into account the purposes of the processing.

If an affected person wishes to exercise this right of rectification, they may, at any time, contact an employee of the controller.

#### d) Right to cancellation (right to be forgotten)

Any person affected by the processing of personal data shall have the right granted by the European Directives and Regulators to require the controller to immediately delete the personal data concerning him, provided that one of the following reasons is satisfied and the processing is not required:

The personal data has been collected for such purposes or otherwise processed for which they are no longer necessary.

According to Art. 21 (1) of the GDPR, the data subject objects to the processing and there are no legitimate reasons for the processing or the data subject objects to the proceedings pursuant to Art. 21 (2) GDPR Processing.

The personal data was processed unlawfully.

The deletion of personal data is necessary to fulfill a legal obligation under Union or national law, to which the controller is subject.

The personal data were collected in relation to information society services offered in accordance with Art. 8 para. 1 DS-GVO.

If one of the above reasons is correct and an affected person wishes to arrange for the deletion of personal data stored at Tradelink International GmbH, they may, at any time, contact an employee of the controller. The employee of Tradelink International GmbH will arrange that the request for deletion be fulfilled immediately.

If the personal data have been made public by Tradelink International GmbH and if our company is responsible for deleting personal data as the person responsible pursuant to Art. 17 para. 1 DS-GVO, Tradelink International GmbH takes appropriate measures, taking into account the available technology and the implementation costs also of a technical nature, to inform other data controllers processing the personal data published that the data subject of these other data controllers has deleted all links to such personal data or copies or replications thereof personal data, unless the processing is required. The employee of Tradelink International GmbH will arrange the necessary in individual cases.

#### e) Right to restriction of processing

Any person affected by the processing of personal data has the right granted by the European directive and regulatory authority to require the controller to restrict the processing if one of the

following conditions applies:

The accuracy of the personal data is contested by the data subject for a period of time that enables the person responsible to verify the accuracy of the personal data.

The processing is unlawful, the data subject refuses to delete the personal data and instead requests the restriction of the use of personal data.

The controller no longer needs the personal data for processing purposes, but the data subject requires them to assert, exercise or defend legal claims.

The person concerned has objection to the processing acc. Art. 21 para. 1 DS-GVO and it is not yet clear whether the legitimate reasons of the person responsible outweigh those of the person concerned.

If one of the above-mentioned conditions exists and an affected person wishes to request the restriction of personal data stored by Tradelink International GmbH, he may at any time contact an employee of the controller. The employee of Tradelink International GmbH will initiate the restriction of processing.

#### f) Data transferability

Any person affected by the processing of personal data shall have the right granted by the European Directive and Regulatory Authority to receive the personal data concerning him / her provided to a controller by the data subject in a structured, common and machine-readable format. It also has the right to transfer this data to another person responsible without hindrance by the controller to whom the personal data were provided, provided that the processing is based on the consent pursuant to Art. 6 (1) (a) GDPR or Art. 9 para 2 (a) of the GDPR or on a contract pursuant to Article 6 (1) (b) of the GDPR and processing by automated means, unless the processing is necessary for the performance of a task of public interest or in the exercise of official authority, which has been assigned to the controller.

Furthermore, in exercising their right to data portability under Article 20 (1) of the GDPR, the data subject has the right to obtain that the personal data is transmitted directly from one controller to another, where technically feasible and if so this does not affect the rights and freedoms of others. In order to assert the right of data transferability, the data subject can contact an employee of Tradelink International GmbH at any time.

#### g) Right to object

Any person concerned by the processing of personal data shall have the right conferred by the European directive and regulatory authority at any time, for reasons arising from its particular situation, against the processing of personal data relating to it pursuant to Article 6 (1) (e) or f DS-GVO takes an objection. This also applies to profiling based on these provisions.

The Runway Sandwiches no longer processes personal data in the event of an objection, unless we can establish compelling legitimate grounds for processing that outweigh the interests, rights and freedoms of the data subject, or the processing serves the purpose of asserting, exercising or Defense of legal claims.

If Tradelink International GmbH processes personal data in order to operate direct mail, the data subject has the right to object at any time to the processing of personal data for the purpose of such advertising. This also applies to the profiling, as far as it is associated with such direct mail. If the data subject objects to Tradelink International GmbH for the purposes of direct marketing, Tradelink International GmbH will no longer process the personal data for these purposes.

In addition, the data subject has the right, for reasons that arise from their particular situation, against the processing of personal data relating to them, for Tradelink International GmbH for scientific or historical research purposes or for statistical purposes pursuant to Art. 89 (1) DS-GMOs to object, unless such processing is necessary to fulfill a public interest task.

In order to exercise the right to object, the data subject can directly contact any employee of Tradelink International GmbH or another employee. The data subject is also free, in the context of the use of information society services, notwithstanding Directive 2002/58 / EC, to exercise his

right of opposition by means of automated procedures using technical specifications.

h) Automated decisions in individual cases including profiling

Any person concerned by the processing of personal data shall have the right, as granted by the European legislature and the legislature, not to be subject to a decision based solely on automated processing, including profiling, which has a legal effect on it or, in a similar manner, significantly affects it; unless the decision (1) is necessary for the conclusion or performance of a contract between the data subject and the controller, or (2) permitted by Union or Member State legislation to which the controller is subject, and that legislation provides for appropriate measures to safeguard the rights and freedoms and the legitimate interests of the data subject; or (3) with the express consent of the data subject.

If the decision (1) is required for the conclusion or performance of a contract between the person concerned and the controller or (2) it takes place with the express consent of the data subject, Tradelink International GmbH shall take appropriate measures to safeguard the rights and freedoms as well as the legitimate interests of the data subject, including at least the right to obtain the intervention of a person by the controller, to express his / her own position and to contest the decision.

If the data subject wishes to rely on automated decision-making rights, they may, at any time, contact an employee of the controller.

i) Right to revoke a data protection consent

Any person affected by the processing of personal data has the right, granted by the European directive and regulatory authority, to revoke consent to the processing of personal data at any time. If the data subject wishes to assert their right to withdraw consent, they may, at any time, contact an employee of the controller.

## 6. Privacy Policy on Use and Use of Facebook

The controller has integrated components of the company Facebook on this website. Facebook is a social network.

A social network is an Internet-based social meeting place, an online community that usually allows users to communicate with each other and interact in virtual space. A social network can serve as a platform for sharing views and experiences, or allows the Internet community to provide personal or business information. Facebook allows social network users to create private profiles, upload photos and socialize via friend requests.

The operating company of Facebook is Facebook, Inc., 1 Hacker Way, Menlo Park, CA 94025, USA. The person responsible for the processing of personal data, if an affected person lives outside the US or Canada, is Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbor, Dublin 2, Ireland.

Each time one of the individual pages of this website, which is operated by the controller and on which a Facebook component (Facebook plug-in) has been integrated, the Internet browser on the information technology system of the person concerned is automatically activated by the respective Facebook Component causes a representation of the corresponding Facebook component of Facebook to download. An overview of all Facebook plug-ins can be found at [https://developers.facebook.com/docs/plugins/?locale=en\\_US](https://developers.facebook.com/docs/plugins/?locale=en_US). As part of this technical process, Facebook receives information about which specific subpage of our website is visited by the person concerned.

If the person concerned is simultaneously logged in to Facebook, Facebook recognizes with each visit to our website by the data subject and during the entire duration of the respective stay on our website, which specific underside of our website visited the person concerned. This information is collected through the Facebook component and assigned by Facebook to the respective Facebook account of the data subject. If the person concerned activates one of the Facebook buttons integrated on our website, for example the "Like" button, or if the person concerned makes a comment,

Facebook assigns this information to the personal Facebook user account of the person concerned and saves this personal data ,

Facebook always receives information via the Facebook component that the data subject has visited our website if the data subject is simultaneously logged in to Facebook at the time of access to our website; this happens regardless of whether the person clicks on the Facebook component or not. If such a transfer of this information to Facebook is not wanted by the person concerned, it can prevent the transfer by logging out of their Facebook account before calling our website.

The data policy published by Facebook, which is available at <https://de-de.facebook.com/about/privacy/>, provides information on the collection, processing and use of personal data by Facebook. It also explains which options Facebook offers to protect the privacy of the data subject. In addition, different applications are available, which make it possible to suppress data transmission to Facebook. Such applications can be used by the data subject to suppress data transmission to Facebook

## 7. Privacy Policy for Use and Use of Google+

The controller has integrated the Google+ button as a component on this website. Google+ is a so-called social network. A social network is an Internet-based social meeting place, an online community that usually allows users to communicate with each other and interact in virtual space. A social network can serve as a platform for sharing views and experiences, or allows the Internet community to provide personal or business information. Google+ allows social network users to create private profiles, upload photos, and socialize through friend requests, among other things. The operating company of Google+ is Google Inc., 1600 Amphitheater Pkwy, Mountain View, CA 94043-1351, USA.

Each visit to one of the pages of this website operated by the controller and incorporating a Google+ button will cause the internet browser on the subject's information technology system to be automatically triggered by the respective Google+ button, a representation of the corresponding Google+ Download button from Google. As part of this technical process, Google will be aware of which specific bottom of our website is visited by the person concerned. More detailed information about Google+ is available at <https://developers.google.com/+/>.

If the person is logged in to Google+ at the same time, Google recognizes with each visit to our website by the data subject and during the entire duration of the respective stay on our website, which specific bottom of our website visited the person concerned. This information is collected through the Google+ button and assigned by Google to the relevant Google + account for the data subject.

If the person concerned activates one of the Google + buttons integrated on our website and thus makes a Google + 1 recommendation, Google assigns this information to the personal Google + user account of the person concerned and stores this personal data. Google will store the Google +1 recommendation of the data subject and make it publicly available in accordance with the conditions accepted by the data subject. A Google +1 referral made by the data subject on this website is subsequently provided together with other personal information, such as the name of the Google + 1 account used by the data subject and the photo in other Google services stored therein, For example, the search engine results of the Google search engine, the Google account of the data subject or other places, such as on websites or in connection with advertisements stored and processed. Furthermore, Google is able to link the visit to this website with other personal data stored on Google. Google also records this personal information for the purpose of improving or streamlining Google's various services.

Google always receives information via the Google + button that the person concerned has visited our website if the person concerned is simultaneously logged in to Google+ at the time of access to our website; this happens regardless of whether the person clicks the Google + button or not. If the data subject does not wish to transfer personal data to Google, the latter can prevent such transmission by logging out of their Google + account before calling our website.

Additional information and Google's privacy policy can be found at <https://www.google.com/intl/en/policies/privacy/>. Additional Google pointers to the Google +1 button can be found at <https://developers.google.com/+web/buttons-policy>.

## 8. Privacy Policy for Use and Use of Instagram

The controller has integrated components of the Instagram service on this website. Instagram is a service that qualifies as an audiovisual platform, allowing users to share photos and videos, as well as to redistribute such data across social networks.

The operating company of Instagram's services is Instagram LLC, 1 Hacker Way, Building 14 First Floor, Menlo Park, CA, USA.

Each time one of the individual pages of this website is called up by the controller and an Instagram component (Insta-Button) has been integrated, the internet browser on the information technology system of the person concerned automatically becomes the respective Instagram component causes to download a representation of the corresponding component of Instagram. As part of this technical process, Instagram is aware of which specific bottom of our website is visited by the person concerned.

If the person concerned is simultaneously logged into Instagram, Instagram recognizes with each visit to our website by the data subject and during the entire duration of the respective stay on our website, which specific subpage the person concerned visits. This information is collected through the Instagram component and assigned through Instagram to the affected person's Instagram account. If the person concerned activates one of the Instagram buttons integrated on our website, the data and information transmitted with it are assigned to the personal Instagram user account of the person concerned and saved and processed by Instagram.

Instagram always receives information via the Instagram component that the person concerned has visited our website if the person concerned is simultaneously logged in to Instagram at the time of accessing our website; this happens regardless of whether the person clicks on the Instagram component or not. If such information is not intended to be transmitted to Instagram by the person concerned, the latter can prevent the transmission by logging out of her Instagram account before calling our website.

Further information and Instagram's privacy policy can be found at <https://help.instagram.com/155833707900388> and <https://www.instagram.com/about/legal/privacy/>.

## 9. Legal basis of processing

Art. 6 I lit. A DS-GMO serves our company as the legal basis for processing operations in which we obtain consent for a particular processing purpose. If the processing of personal data is necessary to fulfill a contract of which the data subject is a party, as is the case, for example, in processing operations necessary for the supply of goods or the provision of any other service or consideration, processing shall be based on Art. 6 I lit. b DS-GMO. The same applies to processing operations that are necessary to carry out pre-contractual measures, for example in the case of inquiries about our products or services. If our company is subject to a legal obligation which requires the processing of personal data, such as the fulfillment of tax obligations, the processing is based on Art. 6 I lit. c DS-GMO. In rare cases, the processing of personal data may be required to protect the vital interests of the data subject or another natural person. This would be the case, for example, if a visitor to our premises were injured and his or her name, age, health insurance or other vital information would have to be passed on to a doctor, hospital or other third party. Then the processing would be based on Art. 6 I lit. d DS-GMOs are based. Ultimately, processing operations could be based on Art. 6 I lit. f DS-GMOs are based. Processing operations that are not covered by any of the above legal bases are based on this legal basis if processing is necessary to safeguard the legitimate interests of our company or a third party, unless the interests, fundamental rights and fundamental freedoms of the person concerned prevail. Such processing operations are particularly permitted because they



have been specifically mentioned by the European legislator. In that regard, it considered that a legitimate interest could be assumed if the data subject is a customer of the controller (recital 47, second sentence, DS-BER).

10. Eligible processing interests that are being pursued by the controller or a third party  
Is the processing of personal data based on Article 6 I lit. f DS-GMO is our legitimate interest in conducting our business for the benefit of all of our employees and our shareholders.

11. Duration for which the personal data is stored

The criterion for the duration of the storage of personal data is the respective statutory retention period. After the deadline, the corresponding data will be routinely deleted, if they are no longer required to fulfill the contract or to initiate a contract.

12. Legal or contractual provisions for the provision of personal data; Necessity for the conclusion of the contract; Obligation of the data subject to provide the personal data; possible consequences of non-provision

We clarify that the provision of personal information is in part required by law (such as tax regulations) or may result from contractual arrangements (such as details of the contractor). Sometimes it may be necessary for a contract to be concluded that an affected person provides us with personal data that must subsequently be processed by us. For example, the data subject is required to provide us with personal information when our company concludes a contract with her. Failure to provide the personal data would mean that the contract with the person concerned could not be closed. Prior to any personal data being provided by the person concerned, the person concerned must contact one of our employees. Our employee will inform the individual on a case-by-case basis whether the provision of the personal data is required by law or contract or required for the conclusion of the contract, whether there is an obligation to provide the personal data, and what would have resulted from the failure to provide the personal data.

13. existence of automated decision-making

As a responsible company, we refrain from automatic decision-making or profiling.

This Privacy Policy was created by the Privacy Policy Generator of DGD Deutsche Gesellschaft für Datenschutz GmbH, which acts as External Data Protection Officer Rosenheim, in cooperation with the lawyer for IT and data protection law Christian Solmecke.