

Data Protection Policy

I. The Purpose of the Data Protection Policy

IGK Group must comply with data protection laws and regulations and this Data Protection Policy (DPP) applies worldwide to IGK group entities.

DPP provides all the necessary conditions for the data transmission between the companies of IGK Group. This DPP sets the mandatory and necessary level of data protection prescribed by the European Union Data Protection Directive and the national laws and legal acts for data transmission.

II. Scope the Data Protection Policy

This DPP applies to all IGK Group companies – it means to IGK AG, to all its daughter companies and affiliated companies and the employees of these companies. The DPP applies to all processing of personal data.

The companies of IGK Group are not allowed to accept their own regulation of the data protection procedure that differs from the regulations of the present DPP. Additional data protection policies or/and other documents can be accepted in the companies of IGK Group only if it is required by the national legislation.

The relevant national law or other legal act will take precedence if it conflicts with the present DPP or if the requirements of the national laws or/and legal acts are stricter than the present DPP. If the national legislation conflicts with the present DPP, IGK AG in cooperation with the relevant company of IGK Group will try finding a solution to follow the purpose of the present DPP. The conditions of the present DPP must be followed in case of absence of corresponding national legislation. Each company of IGK Group is responsible for compliance with the present DPP and its legal obligations.

The latest version of the DPP is available on IGK AG website: <http://igk-group.com/>

III. Principles for processing personal data

Personal data shall be:

- (a) processed lawfully, fairly and in a transparent manner in relation to the data subject (“lawfulness, fairness and transparency”);
- (b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes (“purpose limitation”);
- (c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (“data minimization”);
- (d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (“accuracy”);
- (e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes (“storage limitation”);
- (f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures (“integrity and confidentiality”).

IV. Reliability of data processing

Collecting, processing and using personal data is permitted only under the following legal bases.

1. Customer and partner data

1.1 Data processing for a contractual purpose

IGK group can process the personal data of the relevant prospects, customers and partners in order to establish, execute and terminate a contract. The same regulation refers to any consulting services for the partners and customers if the purpose of such consulting service is to establish the contract (however, it is still possible that after the consulting service is provided the contract is not concluded). The personal data can be processed by IGK Group to prepare a commercial offer or similar information.

1.2 Data processing based on the legal requirements

The processing of the personal data can be made if national legislation requests, requires or allows this. The volume and the kind of the data processing should meet the legal requirements of the national law and/or legal acts.

1.3 Data processing to ensure the protections of the legal interests of IGK Group

The personal data can be processed if it should be made in order to ensure the legal interests of IGK Group, e.g. in order to recover the outstanding receivables or to avoid the possible breach of the contract.

1.4 Processing of highly sensitive data

Highly sensitive personal data can be processed only if the law requires this or the data subject has given express consent.

1.5 User data

If personal data is collected, processed and used on website or in apps, the data subjects must be informed about it with the special statement.

2. Employee data

2.1 Data processing of the employees

In labor relations, the personal data can be processed if it is necessary to initiate, process and/or terminate the employment agreement.

2.2 Data processing to ensure the protections of the legal interest

Personal data of the employees can also be processed if it is necessary to ensure the protection of the legal interests of IGK Group.

V. Transmission of personal data

Transmission of personal data to recipients outside or inside IGK Group is subject to the authorization requirement. All data recipients are obliged to use the data only for the defined purposes.

If the personal data is transmitted to a recipient outside IGK Group to a third country this country should ensure the same data protection level, except situations when such transmission is a legal obligation. If the personal data is transmitted by the third country to a recipient inside IGK Group, it is allowed to use such data only in accordance with its transmission's purpose.

VI. Rights of the data subject

1. The data subject is allowed to request the information about the personal data relating to person has been stored, how the data was collected and for what purpose.
2. If personal data is transmitted to third parties, information must be given about the identity of the recipient or the categories of recipients.
3. If personal data is incorrect/incomplete, the data subject can demand that it be corrected/supplemented.

4. The data subject may request its data to be deleted if the processing of such data has no legal basis, or if the legal basis has ceased to apply. The same condition applies if the purpose behind the data processing has lapsed or ceased to be applicable for other reasons.

VII. Confidentiality of processing

Any unauthorized collection, processing, or use of the personal is prohibited. It is forbidden to use the personal data for any private and/or commercial purposes, to disclose it to unauthorized persons or to make it available in any other way. The obligation to keep the data's secrecy shall remain in force after employment has ended.

VIII. Processing security

Personal data must be protected from any unauthorized access and unlawful processing or disclosure, as well as from any accidental loss, modification or destruction, independently whether the personal data is processed electronically or in paper form.

IX. Data protection control

The performance and activity compliance with the conditions of the present DPP is checked regularly. The performance of these controls is the responsibility of the Chief Officer Corporate Data Protection and other company units with audit rights or external auditors hired. The results of the data protection controls must be reported to the Chief Officer Corporate Data Protection. The Supervisory Board of IGK AG must be informed about the results of the data protection controls.

X. Data protection incidents

All employees must inform their supervisor or the Chief Officer Corporate Data Protection immediately about cases of violations against this DPP or any other regulations on the protection of personal data.

XI. Responsibilities and sanctions

The management of each IGK Group company is responsible for data processing in their area of responsibility. Therefore, they are required to ensure that the legal requirements listed in DPP are fulfilled.

Improper processing of personal data or other violations of the data protection laws, can be criminally prosecuted and result in claims for compensation of damage. Violations for which individual employees are responsible can lead to sanctions under employment law.

XII. Chief Officer of Corporate Data Protection

The Chief Officer Corporate Data Protection is responsible for the DPP and supervises its compliance.

Any data subject may approach the Chief Officer Corporate Data Protection at any time to raise concerns, ask questions, request information or make complaints relating to data protection or data security issues.

Contact details for the Chief Officer Corporate Data Protection and staff are as follows:

IGK AG, Chief Officer Corporate Data Protection,
HRB 15558, Rabinstrasse 1,
Bonn 53111, Germany