Privacy Notice on the Collection of Personal Data in accordance with Articles 13, 14, and 21 of the General Data Protection Regulation (GDPR) for our Business Partners, Service Providers, Customers, and Suppliers

With this notice, we inform you about the processing of your personal data and your rights under data protection law. The specific data we process and the manner in which it is used depend primarily on the services provided and agreed upon.

1. Controller and Contact Information

Controller responsible for data processing:	**Data Protection Officer**
Nidec Motors & Actuators GmbH	EmEtz GmbH
Seewiesenstr. 9, 74321 Bietigheim	Mail: datenschutz@nidec-ma.com
Mail: info@nidec-ma.com	
Telefon:07142/ 508 0	

2. Purpose and Legal Basis for Processing Your Data:

We process personal data in compliance with the EU General Data Protection Regulation (GDPR) as well as all other applicable laws. The processing of personal data (Article 4 No. 2 GDPR) is generally necessary when a business relationship is being established with you or already exists. The purpose of processing primarily depends on the services we provide. Below, we explain the core processing activities within our company. Additional processing activities may occur, and you will be informed about these separately in the relevant context.

- **To Fulfill Contractual Obligations (Article 6 (1) (b) GDPR)**

Data processing is carried out for the handling of orders, bookings, and applications, for preparing offers, and for all pre-contractual measures, including confirmation of the aforementioned matters.

Processing is also conducted for customer master data management, particularly the structured collection, maintenance, and use of relevant data to handle customer inquiries, orders, and customer communication.

In supplier master data management, processing serves the management of delivery information, order placement, goods receipt, and quality assurance. Personal data is therefore processed as necessary to provide our services.

In the context of billing, the personal data of contact persons is processed in connection with invoicing.

If necessary, we also process personal data of our business partners and their contact persons when organizing and conducting online meetings.

- **Based on Your Consent (Article 6 (1) (a) GDPR, Article 9 (2) (a) in conjunction with Article 7 GDPR)**

Where you have given us consent to process personal data for specific purposes, the processing is lawful on the basis of that consent. You may withdraw your consent at any time. Please note that any withdrawal applies only to future processing. Processing activities carried out before the withdrawal remain unaffected.

The sending of newsletters and electronic marketing is carried out on the basis of your consent. Where we take photographs at trade fairs and plan to publish them, this is done in compliance with applicable data protection regulations.

- **Based on Legitimate Interests (Article 6 (1) (f) GDPR)**

Where necessary, we process your data to protect legitimate interests of our company or those of third parties. This may include:

– Ensuring IT security and secure IT operations

– Supplier evaluations

– Customer satisfaction surveys

– Product and process improvements (e.g., product validation)

– The preparation of internal statistics

Furthermore, data may be processed in individual cases to prevent or investigate criminal offenses or to conduct credit checks via credit agencies.

The sending of postal marketing to promote our company and increase sales, as well as corporate governance measures, is also based on our legitimate interests.

- **Processing Based on Legal Obligations (Article 6 (1) (c) GDPR)**

We also process your personal data where this is required to comply with legal obligations. This includes, in particular, retention periods under commercial and tax law, or where we are legally obligated to provide information to public authorities.

If AI technologies, including generative AI (e.g., ChatGPT, Microsoft Copilot), are used to support internal processes—such as the analysis and processing of business documents, the drafting of texts, summaries, and emails, or to improve efficiency and knowledge sharing—this may, in isolated cases, involve the processing of personal data, especially where such data is contained in business documents.

According to our internal policies on the use of generative AI, personal data of business partners, confidential information, and trade secrets may not be knowingly entered into generative AI systems unless such systems are operated entirely under our control (e.g., locally or within secured company infrastructure).

Our employees are instructed not to enter any sensitive or confidential content (e.g., contract data, pricing information, personal data) into publicly or cloud-based generative AI models. The use of such services is strictly in accordance with our internal data protection and security policies and takes into account all applicable confidentiality agreements.

3. Categories of Personal Data We Process:

For the purposes mentioned above, we process personal master data, business communication and contact details (such as telephone number, email address, and, where applicable, physical address), as well as your role and position within the companies of our service providers, business partners, customers, and suppliers. Additionally, we process relevant contractual, billing, and payment data, and where necessary, banking details—primarily business-related financial data.

As part of our collaboration, we also process communication content (e.g., correspondence) with our contacts.

In certain cases, we may process video, audio, and sound recordings of business partners, as well as system-related technical data (e.g., dial-in numbers) or metadata from general correspondence. Image data may also be processed where applicable.

4. Categories of Recipients to Whom We Disclose Data:

Internal Data Processing within the Company:

Certain data processing activities are centralized within our company or corporate group. These activities are performed by specialized departments or entities, such as telephone customer service, invoicing, or mail handling. For data transfers within the group, we have concluded data protection agreements with the affiliated companies to ensure lawful processing.

Externe Auftragnehmer und Dienstleister (dies umfasst auch Auftragsverarbeiter):

External Contractors and Service Providers (Including Data Processors):

Other Recipients:

Data may also be transferred to recipients to whom we are legally obligated to disclose information, such as law enforcement authorities or courts.

5. Further Information

Retention Period:

We process and store your personal data for as long as necessary to maintain our business relationship, which includes the initiation and execution of a contract or order.

In addition, we are subject to various retention obligations, for example, those arising from the German Commercial Code (Handelsgesetzbuch). The storage period is also determined by the statutory limitation periods, which are generally three years but may extend up to thirty years in certain cases.

Data Transfers to Third Countries:

A transfer of personal data to third countries (i.e., countries outside the EU and the European Economic Area – EEA) or to an international organization only takes place if it is necessary for initiating or executing a contract, if such transfer is legally required, or if you have provided your explicit consent. In all cases, such transfers are carried out in compliance with the applicable data protection requirements.

Data Subject Rights:

You have the right to request information about the personal data we store about you (Art. 15 GDPR). Under certain conditions, you may also request the correction or deletion of your data (Art. 16 and 17 GDPR). You also have the right to request the restriction of the processing of your personal data (Art. 18 GDPR).

Furthermore, you have the right to receive the data you have provided to us in a structured, commonly used, and machine-readable format (Art. 20 GDPR).

Obligation to Provide Data:

In the context of establishing or maintaining a business relationship, you are generally only required to provide the personal data necessary for entering into, performing, or terminating the business relationship. Without this data, we may be unable to enter into or fulfill the relationship, or we may be required to terminate it.

Right to Lodge a Complaint:

You have the right to lodge a complaint with the data protection officer mentioned above or with a data protection supervisory authority.

Right to Object:

For legal reasons, we are obligated to inform you of your right to object:

If we process your personal data on the basis of our legitimate interests, you have the right to object to such processing at any time, provided that there are reasons arising from your particular situation which argue against the data processing. In such cases, we will cease processing your personal data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms, or the processing serves to assert, exercise, or defend legal claims.