

Information pursuant to Articles 13, 14 and 21 of the General Data Protection Regulation (GDPR)

We herewith inform you about the processing of your personal data by us and the claims and rights to which you are entitled under the data protection regulations in accordance with Art. 13, 14 and 21 GDPR.

Which data are processed in detail and how they are used depends largely on the requested or agreed services.

1. Who is responsible for data processing and to whom can I contact?

The Controller is:

Responsible for data processing at Adelholzener Alpenquellen GmbH is: Adelholzener Alpenquellen GmbH, St. Primus Str. 1-5, 83313 Siegsdorf, Germany, phone: +49 (0)8662 / 62-0, fax: +49 (0)8662 / 62-199, info@adelholzener.de

Data protection officer: Attorney Dr. Modlinger, postal address as above; Email: datenschutz@adelholzener.de; phone: +49 (0)8662 / 62-0.

Responsible for data processing at GEDAT is: GEDAT Getränkedaten GmbH, Landwehr 2, 22087 Hamburg, Germany, Phone: +49 (0)40 / 24 82 787 - 0, Fax: +49 (0)40 / 24 82 787 - 20 Managing Director (representative): Mr Wolfram Scholz

Data protection officer: Attorney Peter Nümann, postal address as above; Email: dsb@gedat-service.de; Phone: +49(0)40/2482787-38

The respective participants in the Gedat system can be viewed at: <http://gfg-industriepartner.de/>

You can contact our company data protection officer at:

Attorney Dr. Modlinger, postal address as above; Email: datenschutz@adelholzener.de; Phone: +49 (0)8662 / 62-0.

2. What sources and data do we use?

We process personal data that we receive from you when you contact us.

Relevant personal data are personal data (name, address and other contact data such as age, birthday). In addition, this may include advertising and sales data, communication data (telephone number, e-mail address, etc.),

data about your use of our offered telemedia (e.g. time of accessing our websites, pages clicked on at us or entries) and other data comparable to the categories mentioned.

3. What do we process your data for (purpose of processing) and on what legal basis?

We process personal data in accordance with the provisions of the European Data Protection Ordinance (GDPR) and the Federal Data Protection Act (BDSG):

a) To fulfil contractual obligations (Art. 6 para. 1 lit. b) GDPR)

The processing of personal data (Art. 4 No. 2 GDPR) takes place for the execution of our contracts (e.g. sweepstakes) with you as well as all activities necessary for the operation and administration of a company.

b) Within the framework of the balancing of interests (Art. 6 para. 1 lit. f) GDPR)

If necessary, we process your data to protect the legitimate interests of us or third parties. Examples:

- Advertising or market and opinion research, as long as you have not objected to the use of your data (e.g.: GEDAT);
- Measures for business management and further development of services and products.

c) On the basis of your consent (Art. 6 para. 1 lit a) GDPR)

If you have given us your consent to process personal data for certain purposes (e.g. passing on data to third parties, evaluation of data for marketing purposes), the legality of this processing is given on the basis of your consent. A given consent can be revoked at any time.

Please note that the revocation will only take effect in the future. Processing that took place before the revocation is not affected by this.

d) Due to legal requirements (Art. 6 para. 1 lit. c) GDPR) or in the public interest (Art. 6 para. 1 lit. e) GDPR)

In addition, we are subject to various legal obligations, i.e. legal requirements (e.g. commercial law, tax laws, etc.). As far as data are processed in this respect, this is done exclusively on the basis of these regulations.

4. Who gets my data?

Within the company, those departments receive the data they need to fulfil our contractual and legal obligations. Contractors used by us (Art. 28 GDPR) may also receive data for these purposes. These are companies in the categories IT services, printing services, telecommunications, consulting and sales and marketing (e.g. GEDAT).

For the purpose of market research, we participate in a data reporting system with beverage wholesalers and GEDAT Getränkedaten GmbH. We transmit this customer master data to create a verified, unique and up-to-date address data record for each sales location as a basis for the respective data processing of GEDAT customers. This includes the name and address of the sales office, company/name and, if applicable, contact data of the operator, GLN, VAT ID, if applicable, reference to a sales structure. The transmitted data is processed by GEDAT on its own responsibility, if necessary additionally with further available or generally available data on the company and sales structures. In some cases, it uses contract processors. GEDAT stores the data for a maximum of 10 years after the last recorded sales declaration to the sales location.

With regard to the transfer of data to recipients outside the company, it should be noted that we will only pass on your data if this is permitted or required by law, if you have given your consent or if we are authorised to provide information.

Other recipients of data may be those bodies for which you have given us your consent to the transfer of data.

5. How long will my data be stored?

If necessary, we process and store your personal data for the duration of our business relationship, which also includes, for example, the initiation and execution of a contract or to fulfil the contractual purposes.

In addition, we are subject to various storage and documentation obligations, which result, among other things, from the German Commercial Code (HGB) and the Tax Code (AO). The periods for storage and documentation specified there range from two to ten years.

Finally, the storage period is also assessed according to the statutory limitation periods, which, for example, according to §§ 195 et seq. of the German Civil Code (BGB) can generally amount to three years, but in certain cases also up to thirty years.

GEDAT stores the data for a maximum of 10 years after the last recorded sales declaration to the sales location.

6. Will data be transferred to a third country or International Organisation?

Personal data will not be transferred to countries outside the EEA (European Economic Area) or to an International Organisation. Within the scope of remote maintenance of standard IT components, it cannot be ruled out that an IT service provider from a third country (e.g. USA) may in rare cases be controlled and have limited access to personal data in order to correct errors. We will inform you separately about details, if required by law.

7. What data protection rights do I have?

Any data subject has the **right of access** under Article 15 GDPR, the **right to correction** under Article 16 GDPR, the **right to cancellation** under Article 17 GDPR, the **right to limitation of processing** under Article 18 GDPR and the **right to data transferability** under Article 20 GDPR. The restrictions according to §§ 34 and 35 BDSG apply to the right to information and the right of cancellation. In addition, there is a right of appeal to a data protection supervisory authority (Art. 77 GDPR with § 19 BDSG).

Vis-à-vis GEDAT, the data subject has a right of access, rectification, cancellation, restriction of processing, data transferability and objection (Art. 15-21 GDPR), revocation of consent granted (Art. 7 GDPR) and a complaint to a supervisory authority (Art. 77 GDPR).

8. Is there an obligation for me to provide data?

In the context of our business relationship you only have to provide those personal data which are necessary for the establishment, execution and termination of a business relationship or which we are legally obliged to collect. Without these data we will usually have to refuse the conclusion of the contract or the execution of the order or we will no longer be able to execute an existing contract and may have to terminate it.

9. To what extent is there automated decision making in individual cases?

In principle, we do not use fully automated decision making in accordance with Art. 22 GDPR for the establishment and implementation of the business relationship. Should we use these procedures in individual cases, we will inform you separately, insofar as this is required by law.

10. To what extent is my data used for profile development (scoring)?

We do not process your data with the aim of evaluating certain personal aspects (profiling).

Responsible for data processing at GEDAT is: GEDAT Getränkedaten GmbH, Landwehr 2, D-22087 Hamburg, Phone: +49 (0)40 / 24 82 787 - 0, Fax: +49 (0)40 / 24 82 787 - 20 Managing Director (representative): Mr Wolfram Scholz

**Information about your right to object
according to Art. 21 General Data Protection Regulation (GDPR)**

1. Right to object in individual cases

You have the right to object at any time for reasons arising from your particular situation to the processing of personal data concerning you under Article 6 para. 1 lit e) GDPR (Data Processing in the Public Interest) and Article 6 para. 1 lit f) GDPR (Data Processing on the Basis of a Balance of Interests), including profiling based on this provision within the meaning of Article 4 para. 4 GDPR.

The person concerned also has an objection to GEDAT (Art. 15-21 GDPR).

If you object, we will no longer process your personal data, unless we can prove compelling reasons worthy of protection for the processing, which outweigh your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

2. Right to object to the processing of data for direct marketing purposes

In individual cases we process your personal data for direct marketing purposes. You have the right to object at any time to the processing of personal data concerning you for the purpose of such advertising; this also applies to profiling, insofar as it is associated with such direct advertising.

If you object to the processing for direct advertising purposes, we will no longer process your personal data for these purposes.

The objection can be made form-free and should be addressed to:

Responsible for data processing at Adelholzener Alpenquellen GmbH is:
Adelholzener Alpenquellen GmbH, St. Primus Str. 1-5, D-83313 Siegsdorf: +49
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