

Privacy policy for visitors to Schuler AG and its subsidiaries:

1. Person/Entity responsible for the processing of your data (“Controller”)

Schuler AG, represented by its Executive Board:

Domenico Iacovelli (Chief Executive Officer),
Dr. Peter Jost and Thomas Kamphausen

Contact information:

Schuler-Platz 1
73033 Göppingen, Germany
Phone: +49 (71 61) 66-0
Fax: +49 (71 61) 66-233
Email: info@schulergroup.com

2. Schuler AG Data Protection Officer

Dr. Thorsten B. Behling, attorney-at-law
WTS Legal Rechtsanwaltsgesellschaft mbH
Sachenring 83
50677 Cologne
Phone: +49 (0) 221 348 9362-45
Email: datenschutz.web@schulergroup.com

3. Purposes of processing, legal basis

Schuler AG collects, processes, and uses your data for the purpose of providing information security at Schuler AG and its subsidiaries. This applies to both personal data collected, processed, and used as part of your security briefing, as well as personal data which we collect, process, and use during the video surveillance we perform. Video-monitored areas are specifically identified as such in order to alert you to the possibility that you may be recorded on video. Despite this labeling, we ask that you nevertheless always remain aware that the buildings and grounds of Schuler AG and its subsidiaries are monitored by video, and that it is therefore possible for images of your person to be captured.

The collection, processing, and use of your data as part of your security briefing shall take place on the basis of Article 6, paragraph 1, first sentence, letter f of the General Data Protection Regulation (GDPR). Any collection of your personal data using video surveillance installations shall take place on the basis of Section 4 (1), first sentence, number 3 of the German Federal Data Protection Act 2018 (BDSG).

4. Legitimate interests in the processing of data

Schuler AG collects, processes, and uses your data as part of your safety briefing in order to verifiably inform you about the information security policy at Schuler AG and its subsidiaries, and to obtain your commitment to comply with said policy. This serves to protect the intellectual property of Schuler AG and its subsidiaries, which constitutes a legitimate interest within the meaning of Article 6, paragraph 1, first sentence, letter f GDPR.

Your data are collected, processed, and used via video surveillance equipment at Schuler AG and its subsidiaries in order to protect against existing threats, or against a heightened level of potential threats, concerning the property and/or intellectual property of Schuler AG and its subsidiaries. This constitutes a legitimate interest on the part of Schuler AG and its subsidiaries within the meaning of Section 4 (1), first sentence, number 3 BDSG.

5. Recipients of your data

Your data will remain in possession of Schuler AG and its subsidiaries. Internal recipients include the Information Security, Legal, and Compliance departments. In addition, our company Data Protection Officer has access to your data as an external body. Recordings created by the video surveillance equipment can also be viewed by the central technical division.

6. Retention period for your data

We keep any data collected about you as part of the safety briefing for two years. After this period, we will delete this data or render it anonymous.

As a general rule, any data recorded about you as part of our video surveillance is deleted three days after being recorded. It will only be retained for a longer period of time if the recordings should still be necessary in order to resolve or provide evidence of a specific incident. In this case, the data will be locked and will then be deleted immediately upon final conclusion of the clarification measures or as soon as the need for evidence no longer exists.

7. Your privacy rights

You may, at any time, request information from Schuler AG (the controlling body) regarding your stored personal data, the purpose of storage, and the source of the data.

Moreover, in accordance with legal provisions, you have the right to request the rectification, restriction, and erasure of your personal data. Under these provisions, you also have the right to object to the processing of your data. Please direct any related concerns to the following address: datenschutz.web@schulergroup.com

8. Your right to lodge a complaint with a supervisory authority

Pursuant to Article 77 GDPR, you may at any time lodge a complaint with the appropriate data protection supervisory authority, for example, at your place of habitual residence, at your place of work, or at the place of the alleged infringement.

The following data protection supervisory authority is responsible for Schuler AG: State Commissioner for Data Protection and Freedom of Information (Der Landesbeauftragte für den Datenschutz und die Informationsfreiheit), located at

Königstrasse 10 a
70173 Stuttgart
Phone: +49 0711/615541-0
Fax: +49 0711/615541-15
Email: poststelle@lfdi.bwl.de

9. Are you obligated to provide your data, and are there consequences of refusing to do so?

You are under no legal or general contractual obligation to provide your data to Schuler AG. However, if you refuse to provide your data, Schuler AG may deny you access to its buildings and grounds for information security reasons. Should you be obligated to enter our buildings and grounds as a result of contractual agreements with third parties (e.g., with your employer), such a refusal could potentially have a negative effect on the contractual relationship.