

Privacy Policy

We are delighted that you are visiting our website.

The protection and security of your personal data when using our website is very important to us.

We would therefore like to inform you here about what personal data we collect when you visit our website and for what purposes it is used.

This privacy policy applies to the website of **SIEMPELKAMP Sorting & Forming Solutions S.R.L.**, accessible via the domain

www.cmc-texpan.com and its various subdomains.

Who is responsible and how can I contact them?

The data controller

for the processing of personal data in accordance with the European Union's General Data Protection Regulation (GDPR)

SIEMPELKAMP Sorting & Forming Solutions S.R.L.

via L. Rodigari, 10

24020 COLZATE (BG) Italy

Data Protection Officer

Data Protection Officer of the Siempelkamp Group

Email sorting-forming@siempelkamp.com Telephone +39 035 737111.

If you wish to exercise your rights or request information about the processing of your personal data, please contact the Data Protection Officer directly.

What is it about?

This privacy policy meets the legal requirements for transparency in the processing of personal data. This refers to any information relating to an identified or identifiable natural person. This includes, for example, information such as name, age, address, telephone number, date of birth, e-mail address, IP address or user behaviour when visiting a website. Information for which we cannot (or can only with disproportionate effort) establish a reference to your person, e.g. through anonymisation, is not personal data. The processing of personal data (e.g. collection, retrieval, use, storage or transmission) always requires a legal basis and a defined purpose.

Stored personal data is deleted as soon as the purpose of processing has been fulfilled and there are no legitimate reasons for further storage. We will inform you of specific storage periods or storage criteria in individual processing operations. Irrespective of this, we store your personal data in individual cases for the assertion, exercise or defence of legal claims and in the event of statutory storage obligations.

Who receives my data?

We only disclose your personal data that we process on our website to third parties if this is necessary for the fulfilment of the purposes and if it is covered by the legal basis in the individual case (e.g. consent or protection of legitimate interests). In addition, in individual cases, we disclose personal data to third parties if this is necessary for the assertion, exercise or defence of legal claims. Possible recipients may be, for example, law enforcement agencies, solicitors, auditors, courts, etc.

Insofar as we use service providers for the operation of our website who process personal data on our behalf within the scope of commissioned processing in accordance with Art. 28 GDPR, they may be recipients of your personal data. For more information on the use of processors and web services, please refer to the overview of individual processing operations.

Do you use cookies?

Cookies are small files that we send to the browser of your end device when you visit our website and which are stored there. As an alternative to the use of cookies, information can also be stored in the local memory of your browser. Some functions of our website cannot be offered without the use of cookies or local storage (technically necessary cookies). Other cookies, on the other hand, enable us to carry out various analyses, so that we can, for example, recognise the browser used by the user when they visit our website again and transmit various information to us (non-essential cookies). With the help of cookies, we can, among other things, make our website more user-friendly and effective for you, for example by tracking your use of our website and determining your preferred settings (e.g. country and language settings). If third parties process information via cookies, they collect it directly from your browser. Cookies do not cause any damage to the user's end device. They cannot run programmes or contain viruses.

In individual processing operations, we provide information about the respective services for which we use cookies. You can find detailed information about the cookies used in the cookie settings or in the Consent Manager of this website.

Domain	Name	Storage duration
cmc-texpan.com	1e4541e63b131d687bf8cb3d975f6419	Session
cmc-texpan.com	95ed1139e85747b1d091b626e9bb4c60	Approximately 12 months
cmc-texpan.com	cookieconsent_status	approx. 12 months
cmc-texpan.com	nrid	approx. 3 years
cmc-texpan.com	pwebcontact140_openauto	approx. 30 days

What are my rights?

Under the provisions of the General Data Protection Regulation (GDPR), you have the following rights as a data subject:

- **Access** pursuant to Art. 15 GDPR to the data stored about you, in the form of meaningful information about the details of the processing and a copy of your data;
- **Rectification** pursuant to Art. 16 GDPR of incorrect or incomplete data stored by us;
- **Deletion** pursuant to Art. 17 GDPR of data stored by us, unless processing is necessary for the exercise of the right to freedom of expression and information, for compliance with a legal obligation, for reasons of public interest or for the establishment, exercise or defence of legal claims;
- **Restriction** of processing pursuant to Art. 18 GDPR, insofar as the accuracy of the data is disputed, the processing is unlawful, we no longer need the data and you oppose its erasure because you

need it to assert, exercise or defend legal claims, or you have objected to the processing pursuant to Art. 21 GDPR. 21 GDPR. 21 GDPR.

- Data **portability** pursuant to Art. 20 GDPR, insofar as you have provided us with personal data within the scope of consent pursuant to Art. 6 (1) a GDPR or have objected to processing pursuant to Art. 21 GDPR. 6 (1) a GDPR or on the basis of a contract pursuant to Art. 6 (1) b GDPR and have been processed by us with the aid of automated processes. You will receive your data in a structured, commonly used and machine-readable format or we will transfer it directly to another responsible party, insofar as this is technically feasible.
- **Objections** pursuant to Art. 21 GDPR against the processing of your personal data, insofar as this is based on Art. 6 para. 1 lit. e, f GDPR and there are reasons arising from your particular situation or the objection is directed against direct advertising. The right to object does not exist if compelling legitimate grounds for processing are demonstrated or if processing is carried out for the establishment, exercise or defence of legal claims. If the right to object does not exist for individual processing, this will be indicated there.
- **Revocation** pursuant to Art. 7 para. 3 GDPR of consent given with effect for the future.
- **Complaint** pursuant to Art. 77 GDPR to a supervisory authority if you believe that the processing of your personal data violates the GDPR. As a rule, you can contact the supervisory authority of your usual place of residence, your place of work or our company headquarters.

How is my data processed in detail?

Below, we provide information about the individual processing operations, the scope and purposes of data processing, the legal basis, the obligation to provide your data and the storage period. There is no automated decision-making in individual cases, including profiling.

Provision of the website

Nature and purpose of processing

When you access and use our website, we collect personal data that your browser automatically transmits to our server. The following information is temporarily stored in a so-called log file:

- IP address of the requesting computer
- Date and time of access
- Name and URL of the retrieved file
- Website from which the access was made (referrer URL)
- Browser used and, if applicable, computer operating system, as well as the name of the access provider.

Our website is not hosted by us, but by a service provider who processes the above data on our behalf in accordance with Art. 28 GDPR. 28 GDPR. 28 GDPR.

Purpose and legal basis

The processing is carried out to protect our legitimate interest in displaying our website and ensuring its security and stability, based on Art. 6 para. lit. f GDPR. 6 para. lit. f GDPR. The collection of data and its storage in log files is mandatory for the operation of the website. There is no right to object to the processing on the basis of the exception in Art. 21 (1) GDPR. 21 (1) GDPR. 21 (1) GDPR. Insofar as further storage of log files is required by law, the processing is based on Art. 6 (1) lit. c GDPR. 6 (1) lit. c GDPR.

There is no legal or contractual obligation to provide the data, but it is technically not possible to view our website without providing the data.

Duration of storage

The above data will be stored for the duration of your visit to the website and, for technical reasons, for a maximum of 14 days.

Contact form

Nature and scope of processing

On our website, we offer you the opportunity to contact us via a contact form. The information collected via the mandatory fields is necessary to process your enquiry.

You can also provide additional information on a voluntary basis.

When using the contact form, your personal data will not be passed on to third parties.

Purpose and legal basis

The processing of your data via our contact form is carried out for the purpose of communication and processing your enquiry on the basis of your consent in accordance with Art. 6 para. 1 lit. a GDPR. If your enquiry relates to an existing contractual relationship with us, processing is carried out for the purpose of fulfilling the contract on the basis of Art. 6 para. 1 lit. a GDPR. 6 para. 1 lit. b GDPR. There is no legal or contractual obligation to provide your data, but the processing of your enquiry is not possible without providing the information in the mandatory fields. If you do not wish to provide this data, please contact us by other means.

Duration of storage

If you use the contact form on the basis of your consent, we store the data collected for each enquiry for a period of three years from the completion of your enquiry or until you withdraw your consent.

If you use the contact form within the scope of a contractual relationship, we will store the data collected for each enquiry for a period of three years from the end of the contractual relationship.

Contact for applicants

Nature and scope of processing

We collect and process the personal data of applicants. Data processing may also take place electronically, for example when applicants send us their application documents by e-mail or via a web form on our website. On our website, we offer you the option of sending us applications for advertised job vacancies by e-mail.

Furthermore, your data will only be stored in an applicant database beyond the current application process if you have given us your separate consent to do so.

Purpose and legal basis

The processing of your data in connection with your application is carried out for the purpose of processing your application and deciding on the establishment of an employment relationship. If your application documents are forwarded to third parties, in particular to our affiliated companies, and your data is stored beyond the current application process, the processing of your data will be based on Art. 6 (1) sentence 1 lit. a GDPR. There is no legal or contractual obligation to provide your data, but the processing of your application is not possible without the provision of the information.

Duration of storage

The data collected will be stored for a period of six months from the date of assignment of the position.

Newsletter

Nature and scope of processing

If you register on our website to receive our newsletter, we collect your e-mail address and your name and store this information together with the date of registration and your IP address. You will then receive an e-mail in which you must confirm your registration for the newsletter (double opt-in). If you do not confirm your registration within 12 hours, it will automatically expire and your data will not be processed for the purpose of sending the newsletter.

We use a service provider to send the newsletter, who processes your personal data on our behalf in accordance with Art. 28 GDPR. Your data will not be passed on to third parties.

Purpose and legal basis

We process your data for the purpose of sending the newsletter on the basis of your consent in accordance with Art. 6 para. 1 lit. a GDPR. By unsubscribing from the newsletter, you can declare your revocation at any time with effect for the future in accordance with Art. 7 (3) GDPR. There is no legal or contractual obligation to provide your data, but the newsletter cannot be sent without your data.

Duration of storage

After registering for the newsletter, the data is stored for a maximum of 12 hours until the registration is confirmed. After confirmation, the data is stored until consent is revoked (unsubscribing from the newsletter) and, for technical reasons, for a maximum of 30 days.

Presence on social media platforms

We operate fan pages, accounts or channels on the networks listed below in order to provide you with information and offers within social networks and to offer you additional opportunities to contact us and find out about our offers. Below, we provide information about which of your data we or the respective social network process in connection with your visit to and use of our fan pages/accounts.

Data we process from you

If you wish to contact us via messenger or direct message through the respective social network, we generally process your user name with which you contact us and, if necessary, store other data you provide to the extent necessary to process/respond to your enquiry.

The legal basis is Art. 6 para. 1 sentence 1 f) GDPR (processing is necessary to protect the legitimate interests of the controller).

(Static) usage data we receive from social networks

We receive automated statistics about our accounts through Insights features. Statistics include, among other things, the total number of page views, likes, page activity and interactions with posts, reach, video views and the percentage of men/women among our fans/followers.

The statistics contain only aggregated data that cannot be traced back to individual persons. The user cannot be identified through this data.

What data is processed by social networks

To view the content of our fan pages or accounts, it is not necessary to be a member of the respective social network and, in this regard, no user account for the respective social network is required.

Please note, however, that social networks also collect and store data from website visitors without a user account when the respective social network is accessed (e.g. technical data to enable the website to be displayed to the user) and use cookies and similar technologies, over which we have no control. Details on this can be found in the privacy policy of the respective social network (see the corresponding links above).

If you wish to interact with the content of our pages/fan accounts, for example by commenting, sharing or liking our posts/contributions and/or contacting us via the messaging functions, you must first register with the respective social network and provide your personal data.

We have no influence on the processing of data by social networks when you use them. To our knowledge, your data is stored and processed in particular in connection with the provision of the services of the respective social network, as well as for the analysis of user behaviour (using cookies, pixels/web beacons and similar technologies), on the basis of which interest-based advertising is reproduced both within and outside the respective social network. It cannot be ruled out that your data may be stored by social networks outside the EU/EEA and passed on to third parties.

Information on, among other things, the exact scope and purposes of the processing of your personal data, the storage/deletion period, as well as guidelines on the use of cookies and similar technologies in the context of registration and use of social networks can be found in the privacy policy/cookie policy of the social networks. There you will also find information about your rights and options for objection.

LinkedIn page

LinkedIn is a social network operated by LinkedIn Inc. based in Sunnyvale, California, USA, which allows users to create private and professional profiles. Users can maintain existing contacts and make new ones. Companies can create profiles where they can upload photos and other company information. Other LinkedIn users have access to this information and can write their own articles and share them with others.

The focus is on professional exchange on specialist topics with people who have the same professional interests. In addition, LinkedIn is often used by companies and other organisations to recruit employees and present themselves as employers.

For more information about LinkedIn, please visit: <https://about.linkedin.com/>

Further information on data protection at LinkedIn can be found at:

<https://www.linkedin.com/legal/privacy-policy>

We do not collect or process any personal data via our LinkedIn company page.

Wistia

Nature and scope of processing

We have integrated Wistia into our website. Wistia is a component of the video platform of Wistia, Inc. where users can upload content, share it on the Internet and obtain detailed statistics.

Wistia allows us to integrate content from the platform into our website.

Wistia uses cookies and other browser technologies to analyse user behaviour, recognise users and create user profiles. This information is used, among other things, to analyse the activity of the content listened to and to create reports.

When you access this content, you connect to Wistia, Inc.'s servers and your IP address and, if applicable, browser data such as your user agent are transmitted.

Purpose and legal basis

The use of the service is based on our legitimate interests, i.e. our interest in platform-independent content delivery, in accordance with Art. 6(1)(f) GDPR.

Storage period

The specific storage period for the processed data cannot be influenced by us, but is determined by Wistia, Inc. Further information can be found in Wistia's privacy policy: <https://wistia.com/privacy>.

Cookies and user – Consent management

Nature and scope of processing

We have integrated Cookies & You into our website. Cookies & You is a consent solution from Osano, Inc., A Public Benefit Corporation, 3800 N Lamar Blvd Ste, 200 Austin, TX 78756, with which consent to the storage of cookies can be obtained and documented. Cookies & You uses cookies or other web technologies to recognise users and store the consent they have given or revoked.

Purpose and legal basis

The use of the service is based on the legally required consent to receive the use of cookies in accordance with Art. 6 sec. 1 lit.c. GDPR.

Duration of storage

The actual duration of storage of the processed data is not influenced by us, but is determined by Osano, Inc, A Public Benefit Corporation.

For more information, please refer to the Cookies & You privacy policy: <https://www.osano.com/legal/gdpr>

Privacy policy for our business partners

(Information on the processing of your personal data)

During the course of the business relationship between you and **SIEMPELKAMP Sorting & Forming Solutions S.R.L.**, personal data will be collected and processed.

With the following information, we would like to give you an overview of the processing and your rights:

a) Who is responsible for data processing and who can I contact?

SIEMPELKAMP Sorting & Forming Solutions S.R.L., with registered office at Via L. Rodigari 10, 24020 Colzate (BG), tax code and VAT number 0229450168.

To exercise your rights as a data subject or if you have any questions about data processing, please contact our data protection officer directly:

Group Data Protection Officer

[email sorting-forming@siempelkamp.com](mailto:sorting-forming@siempelkamp.com) – telephone +39 035 737111.

b) Why do we process your data and on what legal basis?

Personal data collected directly from you will be processed by SIEMPELKAMP Sorting & Forming Solutions S.R.L. for the purpose of planning, implementing or terminating the business relationship. In addition, your personal data will be collected and processed for the exercise or fulfilment of legal obligations.

This processing is carried out on the basis of:

- your consent (Art. 6(1)(a) GDPR)
- contractual obligations (Art. 6(1)(b) GDPR)
- legal obligations (Art. 6(1)(c) GDPR)
- our legitimate interests (Art. 6(1)(d) GDPR).

c) Who receives your data?

Within our company, access to your data is granted to departments that need it to fulfil our contractual and legal obligations. In addition, the following recipients receive your data:

Who receives your data? What data?

Internal positions Personal data, contact details and enquiry data, to the extent necessary for processing the business relationship.

Companies of **SIEMPELKAMP Sorting & Forming Solutions Ltd.**

Companies used for the fulfilment of contractual obligations.

External service providers (as required, e.g. transport companies or subcontractors) Personal data, contact details, delivery data or contractual data, insofar as this is necessary for the processing of the business relationship.

Authorities (as required, e.g. customs or tax authorities) Company data, contractual data, logistics information and contact information, to the extent necessary for the processing of the business relationship.

d) Is there a transfer to countries outside the EU?

The transfer of your personal data to countries outside the EU (so-called third countries) is not planned by default. If the corresponding transfer of personal data to third countries takes place as a result of contractual obligations, this will only take place within the scope of the contractual relationship.

e) How long will your data be stored?

We process and store your data for as long as is necessary to fulfil our contractual and legal obligations. Please note that our business relationship with you may be an ongoing obligation that can last for years.

If your data is no longer required for the fulfilment of contractual or legal obligations, it will be deleted by us, unless further processing or storage is required for legal reasons. Such legal reasons include, for example, retention obligations under commercial and tax law. The specified periods for data retention are generally between two and ten years.

In addition, we may need your data for evidentiary purposes in connection with warranty claims, the termination of the business relationship or rights and obligations arising from our contract. With regard to this data, it is usually deleted after the expiry of the limitation periods.

f) What rights do you have?

You have the right to request information from **SIEMPELKAMP Sorting & Forming Solutions S.R.L.** at any time about the data stored about you. In addition, you may at any time request **SIEMPELKAMP Sorting & Forming Solutions S.R.L.** to correct, delete, restrict or transfer your personal data or to object to its processing. To do so, please contact our data protection officer as indicated above.

If you believe that your personal data is being processed unlawfully, you have the right to lodge a complaint with the competent supervisory authority.

g) Obligation to provide personal data

Within the scope of our business relationship, you are required to provide the data necessary for the establishment, execution and termination of the business relationship and for the fulfilment of the associated contractual obligations, or which we are required to collect by law. Without this data, we are generally unable to enter into a contract with you or your employer, execute it and terminate it.

h) Automated decision-making and profiling

No automated decisions or other profiling measures are carried out.

