

Data protection notice for business contacts of Würth Elektronik Bulgaria

Version September 2023

This notice provides you with an overview of the processing of your personal data and your rights as pursuant to the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (“GDPR”).

1. Identity of the Data Protection Controller

Würth Elektronik Bulgaria is the data controller with regards to the processing of your personal data and, therefore, responsible for processing your personal data in accordance with the applicable data protection legislation. Our contact details are: Würth Elektronik Bulgaria, Mladost 4, Business Park Sofia, Bldg. 12B, Fl. 3, Office 305, Sofia 1766, Bulgaria. e-mail: eiSos-bulgaria@we-online.com

2. Contact data of the Data Protection Officer

For questions and information pertaining to the handling of your personal data, please contact the following office of Würth Elektronik Bulgaria at any time. At this e-mail address you can contact the data protection team at Würth Elektronik Bulgaria. data-protection-bg@we-online.com

3. Collecting and processing of your data provided by you – purpose and legal basis

We collect and process your data for the purpose of initiating a contractual relationship and processing orders. The legal basis for the processing of your data is **Article 6 (1) lit. b) GDPR** (prior to entering into a contract or necessary for the performance of a contract). In addition, we use your contact data to send so-called PCNs (Product Change Notification) / PTNs (Product Termination Notice). This is done to fulfil a contractual obligation pursuant to **Article 6 (1) lit. b) GDPR** or to safeguard our common interests pursuant to **Article 6 (1) lit. f) GDPR**. The legitimate interest lies in the interests of respecting contractual duties of data protection as well as ensuring your early involvement so as to create reliability in planning.

If necessary, we process your data beyond the purposes of the contract to protect legitimate interests as pursuant to **Article 6 (1) lit. f) GDPR**, to develop and improve our offers and manage business activities. Furthermore, there is a legitimate interest in maintaining risk management within the Würth Elektronik Group WE can confirm that data will not be subject to further processing where it would supersede the overriding interests of the data subject. Within the context of the legitimate interest in accordance with **Article 6 (1) lit. f) GDPR**, we also use your data to inform you about similar deals and products. In rare cases, we also process your personal data for direct e-mail purposes and direct marketing purposes.

When you make use of free services, such as the download of a white paper/publication provided free of charge, we also obtain your consent in accordance with Art. 6 Para. 1 lit. a) (consent), for advertising purposes. You

therefore consent to us informing you by post, telephone or e-mail about Würth Elektronik products or services. In addition, it is possible that any partner companies that have contributed to the creation of the free service (whitepaper/publication) may also advertise to you via the aforementioned advertising channels. **You can unsubscribe your advertising consent at any time at data-protection-bg@we-online.com.**

In case you do not want to receive any more advertising from a partner company, please send your revocation directly to the respective company.

In addition to personal data that we receive directly from you, we also process and collect data for supplementation and validation through our own research in accordance with **Article 14 of GDPR**. The legal basis for this is the principle of data accuracy pursuant to **Article 5 (1) d GDPR** as well as the protection of our legitimate interests for the purpose of verifying and updating our database pursuant to **Article 6 (1) lit. f) GDPR**. The data is used exclusively within the scope of the purposes stated here.

In the event of the data having to be processed for any other reason, the data subject will be provided with information about this additional processing. In the event of registration for a Würth Elektronik event, the data you provide will be used for the purpose of event participation. The data you provide enables us to register you at the event according to your own specifications, to contact you for this purpose and thus to enable the event to run smoothly. For some events, we may contact you afterwards for promotional purposes. If you give us your consent to use your data for advertising purposes, we will process your data to inform you about Würth Elektronik products or services by post, telephone or e-mail. The legal basis for this data processing is **Article 6 (1) lit. a) (consent), Article 6 (1) lit. b) GDPR** (fulfilment of a contract) and in any case the existence of a legitimate interest in accordance with **Article 6 (1) lit. f) GDPR**. The legitimate interests are to make your participation as pleasant as possible for you, to enable exchanges between participants during and after the event, and to provide you with information about products and services (**recital 47 of the GDPR**).

For the purpose of **preventing corruption**, we collect and document your personal data - in particular your first and last name, as well as the company in which you work - in order to be able to provide proof of the avoidance of bribery in business transactions, e.g. for business meals or other business events. The processing of your personal data is carried out in our legitimate interest in accordance with Article 6 (1) f) GDPR.

Our legitimate interest lies in the need for detailed documentation and compliance of relevant transactions.

4. Recipients

Würth Elektronik enlists specialized technical service providers – processors of personal data (“**Processors**”) – within the scope of the technical processing of your personal data for order processing. These service providers – Processors are carefully selected and legally and contractually required to ensure a high level of data protection. The processing of your personal data is conducted in accordance with **Article 28 GDPR**.



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We contract a shipping company to complete your order. These companies are legally required, as are we, to ensure and observe a high level of data protection. We only share your personal data with third parties for other purposes than those mentioned here insofar as we are legally obligated to do so in the form of an overriding legal provision (e.g., in the event of an audit).

Participation in the **event for free** may make it possible for us to pass on your data to the respective organizer for registration purposes. This could also be an international affiliated company within the Würth Elektronik Group in whose country or in whose name the event takes place. These are listed [here](#). Würth Elektronik sometimes uses service providers (e.g. technical service providers, etc.) to register for an event and/or as part of the actual implementation (e.g. creating nametags for participants or lists of participants). These service providers are carefully selected, and are legally and contractually obliged to ensure a high level of confidentiality. Your data will be processed in accordance with **Article 28 GDPR**.

Depending on your location, it is possible that your contact data may be passed on to the responsible international sister company within the Würth Elektronik eiSos Group to get in contact with you.

5. Data security

The personal data collected and stored by us will be handled confidentially and protected by appropriate technical and organizational measures against loss and modification as well as unauthorized access by third parties.

6. Duration of storage

We store your personal data for as long as is necessary to fulfil our contractual obligations and to achieve the contractual purpose. In addition, retention obligations and periods as stipulated by law or supervisory authorities are also in effect. Once these retention obligations and periods expire, it is standard procedure to delete your data in the manner stipulated in law. If any data are not subject to the aforementioned retention obligations and periods, they are deleted as soon as their storage is no longer required for the intended purpose. It should be noted that the business relationship may evolve into a continuing obligation, which can last several years.

Even after attaining the contractual or legal obligation, a retention obligation may remain in effect as follows:

- Retention periods pursuant to accounting or tax legislation: such stipulated periods for retention and/or documentation are up to 10 years with effect from 1 January of the reporting period following the reporting period to which they relate.
- Conservation of evidence within the regulations on limitation periods according to Article 110 et seq. of Law for Obligations and Contracts. The standard limitation period is five years.

7. Your rights

If all legal requirements have been fulfilled, you have the right to request from us access to your personal data or the data processing (**Article 15 GDPR**) and the rectification, erasure and restriction of your personal data or data processing (**Articles 16 to 18 GDPR**) as well as the right to data portability (the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided) (**Article 20 GDPR**).

In addition, if all legal requirements have been fulfilled you have a right to object to the processing of your data as pursuant to Article 21 GDPR, which is based on a "legitimate interest" pursued by the controller in accordance with Article 6 (1) lit. f) GDPR. Particularly, this includes the use of your personal data intending direct mailing

If you wish to exercise these rights or if you want to revoke your consent to the processing of personal data, in full or in part, with effect for the future, please send an email to: data-protection-bg@we-online.com or send a message to the address listed in Item 2.

Furthermore, according to **Article 77 (1) GDPR** you also have the right to lodge a complaint with a supervisory authority, in particular in the Member State where you reside or work or where the alleged violation takes place if you believe that the processing of your personal data is in violation of GDPR.

The supervisory authority for the protection of personal data in Bulgaria is:

Commission for Personal Data Protection

2, Prof. Tsvetan Lazarov Blvd., Sofia 1592, Bulgaria

Phone number: **+359 2 9153519**

Email: kzld@cpdp.bg

Website: www.cdpd.bg

Supplementary data protection notices, in particular on your rights to access, rectification, erasure, restriction of processing, data portability, to object and to lodge a complaint, see our data protection notice at:

www.we-online.com/privacy