

Data Protection Policy

of Würth Elektronik Danmark A/S



Version June 2023

This Data Protection Policy describes how Würth Elektronik Danmark A/S processes 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 (the General Data Protection Regulation) as incorporated into Danish law ("GDPR") and Act no. 502 of 23 May 2018 on provisions supplementing the regulation on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("the Privacy Act").

1. Identity of the Data Protection Controller

The Data Controller for your personal data is Würth Elektronik Danmark A/S a company having its registered office at Agro Food Park 26, 8200 Aarhus N, Denmark, registered in Denmark, CVR number 44129841. The responsible authority is your contact person at Würth Elektronik Danmark A/S

2. Contact data of the Data Protection Officer

For questions and information pertaining to the handling of your personal data, please contact the Data Protection Team of Würth Elektronik Danmark A/S at any time. The e-mail address where you can contact us is: data-protection-dk@we-online.com.

3. Collecting and processing data provided by you – type, purpose & legal basis

We collect and process your data for the purpose of initiating a contractual relationship and processing your orders. Data stored includes name, address(es) given, contact details, place of delivery and purchase history. The legal basis for the processing of your data is **Art. 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 **Art. 6 (1) lit. b) GDPR** or to safeguard our common interests pursuant to **Art. 6 (1) lit. f) GDPR**. The legitimate interest lies in the interests of respecting the 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 **Art. 6 (1) lit. f) GDPR**, to develop and internally 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. If, in accordance with **Art. 6 (1) lit. f) GDPR (consent)**, you have asked for information about similar offers and products or you have given your consent to send you newsletters, e-mails and direct marketing we also use your data to inform you and market our products and services.

In addition, when you make use of our free services, such as the download of a white paper/publication, we also obtain your consent in accordance with **Art. 6 (1) lit. a) (consent) GDPR**, for advertising purposes. You therefore consent to us informing you by post, telephone or e-mail about Würth Elektronik Danmark A/S products or services. Additionally, 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 provided you have consented to this. You can unsubscribe your advertising consent at any time by e-mailing data-protection-dk@we-online.com.

In case you do not want to receive any further 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 **Art. 14 GDPR**. The legal basis for this is the principle of data accuracy pursuant to **Art. 5 (1) d) GDPR** as well as the protection of our legitimate interests for the purpose of verifying and updating our database pursuant to **Art. 6 (1) lit. f) GDPR**. The data is used exclusively within the scope of the purposes stated here.

In the event of registration for a Würth Elektronik Danmark A/S 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. The purpose is to make your participation as pleasant as possible for you and, provided you have given your consent pursuant to **Art. 6 (1) lit. a) GDPR**, to enable exchanges between participants during and after the event, and to provide you with information about products and services in connection with future events. We will process your data to inform you about Würth Elektronik Danmark A/S products or services by post, telephone or e-mail. The legal basis for this data processing is **Art. 6 (1) lit. a) (consent), Art. 6 (1) lit. b) GDPR (fulfilment of a contract)** and in any case the existence of a legitimate interest in accordance with **Art. 6 (1) lit. f) 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 **Art. 6 (1) f) GDPR**. Our legitimate interest lies in the need for detailed documentation and compliance of relevant transactions.

4. Recipients

Würth Elektronik Danmark A/S will only share your personal data to the extent this is required to process and complete your order or for the performance of our relationship with our suppliers and business partners. We enlist specialised 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 **Art. 28 GDPR**.

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If agreed with you, we contract a shipping company to deliver your order. The shipping company is legally required, as are we, to ensure and observe a high level of data protection. Furthermore, 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, a judgment or an enactment).

Participation in one of our events may mean that it is necessary 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 Danmark A/S 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 **Art. 28 GDPR** and provided consent is required in accordance with **Art. 6 (1) lit. a) 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. In some cases where the local company cannot support you directly, contact may be made from our international group companies, usually from Greenland, the Faeroe Islands, DE, FR, IT & the USA. If the support is provided from non-EU countries, you will be asked to provide your consent, pursuant to **Art. 6 (1), litra a)**.

5. Data security

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

If we transfer your personal data to another country, we are bound by our group data transfer agreement, which serves as the basis for the group-internal data transfer. We will take all steps reasonably necessary to ensure that your personal data is handled securely and in accordance with the Privacy Act. These include ensuring, where the country does not provide an adequate level of protection, that we enter into standard contractual clauses where appropriate and also ensuring additional safeguards are implemented where appropriate. For further information about the safeguards in place when transferring your personal data outside of the EU, contact data-protection-dk@we-online.com.

6. Duration of storage

We store your personal data for as long as is necessary to meet our contractual obligations, to facilitate your easy access to spare parts and to fulfil the contractual purpose, although for a period of no longer than ten (10) years. 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 by law. If any data is not subject to the aforementioned retention obligations and periods, it is deleted as soon as 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. We will retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a

prospect of litigation in respect to our relationship with you, although no longer than ten (10) years. If you would like further information about our retention periods, contact data-protection-dk@we-online.com.

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 (**Art. 15 GDPR**) and the rectification, erasure and restriction of your personal data or data processing (**Art. 16 to 18 GDPR**) as well as the right to data portability (**Art. 20 GDPR**).

You also have a right to object to the processing of your data as pursuant to **Art. 21 GDPR**, which is based on a "legitimate interest" pursued by the controller in accordance with **Art. 6 (1) lit. f) GDPR**.

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-dk@we-online.com.

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

The supervisory authority for the protection of personal data in Denmark:

Datatilsynet
Carl Jacobsens Vej 35
DK-2500 Valby
Phone: +45 33 19 32 00
Email: dt@datatilsynet.dk

Supplementary data protection notices, in particular concerning use of the website of the Würth Elektronik Group, social media, contact forms, user accounts, newsletters etc. and on your rights to access, rectification, erasure, restriction of processing, data portability, to object and to lodge a complaint, can also be found in our data protection notice at:

www.we-online.com/privacy