# **Data protection notice business contact** of Wurth Electronics UK Ltd.



Version January 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) as incorporated into United Kingdom law ("UK GDPR") and the Data Protection Act 2018 ("Data Privacy Laws").

### 1. Identity of the Data Protection Controller

The data controller for your personal data is Wurth Electronics UK Ltd., a company having its registered office at 8 The Vic, MediaCityUK, Manchester M50 3SP, registered in England, Company Number 5989226. The responsible authority is your contact person at Wurth Electronics UK Ltd.

#### 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 Wurth Elektronics UK Ltd. at any time. The e-mail address where you can contact us is: **data-protection-uk@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 orders. Data stored includes name, addresses given, contact details, training details including education, training given, professional expertise, employment details including career history, job role and function. 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 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 **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, with your consent, we also process your personal data for direct e-mail purposes and direct marketing purposes.

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 **Article 6 (1) lit. a) (consent)**, for advertising purposes. You

therefore consent to us informing you by post, telephone or e-mail about Wurth Electronics 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. **You can unsubscribe your advertising consent at any time by e-mailing data-protection-uk@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 **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 registration for a Wurth Electronics UK Ltd. 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, 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 some events, we may contact you afterwards for promotional purposes. We may use your data for advertising purposes, to inform you about similar deals and products, which is a legitimate interest and in accordance with Article 6 (1) lit. f) GDPR . In this regard we have carried out the balancing exercise required by data protection law and met general obligations under the GDPR accountability principle. We will process your data to inform you about Wurth Electronics 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.

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### 4. Recipients

Wurth Electronics enlists 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 **Article 28 GDPR**.

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 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**. Wurth Electronics 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.** 

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 DE, FR, IT & USA although in some cases other countries – In this regard 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 Data Privacy Laws. These include ensuring, where the country does not provide an adequate level of protection, that we enter into standard contractual clauses where appropriate. For further information about the safeguards in place when transferring your personal data outside of the UK, contact **data-protection-uk@we-online.com.** 

### 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.

### 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 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 may 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. If you would like further information about our retention periods, contact **data-protection-uk@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 (**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 for direct mail purposes.

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-uk@we-online.com**.

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 the UK: The Information Commissioner's Office, Water Lane, Wycliffe House, Wilmslow - Cheshire SK9 5AF

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