

## Data Protection Policy

The protection of your data is of highest concern to Legero Schuhfabrik Gesellschaft mbH (hereinafter: "we"). Therefore, hereby we want to inform you how we process your personal data, if you place an order with us either as an individual entrepreneur or as a contact person of a company, or if you contact us in the context of such an order.

As a general rule: All processing of your personal data is done in accordance with the applicable data protection laws, in particular the General Data Protection Regulation (GDPR)<sup>1</sup> and the Austrian Data Protection Act (DSG)<sup>2</sup>.

### General Information:

The controller responsible for the processing of your personal data is:

Legero Schuhfabrik Gesellschaft mbH (FN 59571f)  
Legero-United-Straße 4  
A-8073 Feldkirchen bei Graz  
E-Mail to [office@legero-united.com](mailto:office@legero-united.com)  
Telephone: +43 316 429 100

### Data Processing:

#### 1. Purpose of Processing:

We process your personal data exclusively for the following purposes:

- a) Receiving, processing and fulfilling orders that you or your company place with us, including contacting you and communicating with you in this regard, carrying out deliveries, processing complaints and ensuring compliance with our contractual obligations
- b) Billing, invoicing and (if necessary) dunning in connection with orders placed with us by you or your company;
- c) Obtaining credit information about your business, obtaining risk assessments and reviewing, taking out and maintaining insurance policies relating to the order placed by you or your business;
- d) Preparation of statistics and intra-group reporting;
- e) Sending marketing material;
- f) Enforcing legal claims or defending against legal claims;
- g) Complying with recording, disclosure and reporting obligations insofar as required by law;

#### 2. Origin of the Personal Data:

For the above-mentioned purpose 1c) we collect data on the creditworthiness and solvency of your company from specialized third parties (e.g. creditor protection associations).

We collect all other personal data exclusively from you yourself, by you providing them to us in connection with your order or by collecting them based on your orders, our deliveries to you, your payment of our invoices or our communication with you.

#### 3. Legal Basis of the Processing of Your Personal Data:

The processing of your personal data for the purposes listed in Section 1. above is based on the following legal bases:

- *Data processing for purposes 1a) and 1b):*

The legal basis for the processing of your personal data for these purposes is that this data processing is necessary so that we can fulfil our contract with your company (Article 6 (1b) GDPR).

If you are merely a contact person of a company that concludes or has concluded a contract with us, our processing of your personal data for these purposes is based on our legitimate interest in processing the data of contact persons in order to ensure better allocation of orders and declarations as well as to simplify communication with our customers (Article 6 (1f) GDPR).

- *Data processing for purpose 1c):*

The legal basis for the processing of your personal data for this purpose is our legitimate interest in obtaining credit information and risk assessments about companies that place orders with us on account and our legitimate interest in insuring our claims against our customers in order to keep our risk of default as low as possible (Article 6 (1f) GDPR). We do not conduct any automated decision-making within the meaning of Article 22 GDPR.

- *Data processing for purpose 1d):*

The legal basis for the processing of your personal data for this purpose is our legitimate interest in compiling general statistics and reports in order to evaluate our services and to offer our customers the best services possible (Article 6 (1f) GDPR). We do not conduct any automated decision-making within the meaning of Article 22 GDPR.

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<sup>1</sup> You can find the full text of the General Data Protection Regulation (GDPR) in English online at: <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679&from=EN>

<sup>2</sup> You can find the full text of the Austrian Data Protection Act (DSG) in English online at: [https://www.ris.bka.gv.at/Dokumente/Erw/ERV\\_1999\\_1\\_165/ERV\\_1999\\_1\\_165.html](https://www.ris.bka.gv.at/Dokumente/Erw/ERV_1999_1_165/ERV_1999_1_165.html)

- *Data processing for purpose 1e):*

The legal basis for the processing of your personal data for this purpose is our legitimate interest in informing you about our products and promotions (Article 6 (1f) GDPR). You can object to receiving marketing material at any time; the exact information on this can be found in the respective marketing material (e.g. newsletter) itself. However, you can also use the contact address stated above to object to receiving further marketing material.

- *Data processing for purpose 1f):*

The legal basis for the processing of your personal data for this purpose is our legitimate interest in asserting any legal claims that may arise in connection with your company's orders from us and in defending ourselves against any such legal claims (Article 6 (1f) GDPR).

- *Data processing for purpose 1g):*

The legal basis for the processing of your personal data for this purpose is the fact that the processing of this data is necessary so that we can fulfil our legal obligations, namely our legal recording, disclosure and reporting obligations (Article 6 (1c) GDPR).

#### 4. Transfer of your Personal Data to Third Parties:

We use IT service providers as processors to ensure the security, accessibility and efficiency of our working environment. Your personal data may also be made accessible to these processors for the above-mentioned purposes (1a-1g).

Furthermore, we use logistics and delivery service providers to process your order (purpose 1a), to whom we will forward your personal data for this purpose. For the abovementioned purpose 1b), we may also forward your data to our tax consultants and, if necessary, to debt collection agencies.

To the extent necessary for the abovementioned purpose 1c), we may disclose your personal data to creditor protection associations, banking institutions, insurance companies and other third parties specializing in credit information, risk assessments and debt insurance.

To achieve the abovementioned purpose 1e), we also involve marketing service providers to whom your contact data may be made accessible for this purpose.

Finally, we will pass on your personal data to our affiliated companies for the abovementioned purposes, insofar as this is necessary to fulfil the abovementioned purposes. All companies affiliated with us in our Group will process these data only for the abovementioned purposes (1a-1g) and will guarantee an adequate level of data protection.

If necessary for the abovementioned purposes 1b) and 1f), we may forward your personal data to our legal representatives and to courts. If necessary and required by law to achieve the abovementioned purpose 1g), we will forward your personal data to authorized authorities or third parties.

We will not transfer any personal data to third countries outside the European Economic Area without first obtaining your consent (which you may revoke at any time), unless this is necessary to carry out your order (Article 49 (1b) GDPR).

#### 5. Retention of your Personal Data:

We will retain your personal data only as long as we reasonably consider this retention to be necessary in order to fulfil the abovementioned purposes and insofar as this is permissible under the applicable law. In any case, we will retain your personal data as long as legal retention obligations (including, but not limited to the seven-year retention obligation of Article 212 of the Austrian Commercial Code (UGB) for contractual documents and the seven-year retention obligation pursuant to Article 132 of the Austrian Federal Fiscal Code (BAO) for financial documents) or statutory limitation periods of potential legal claims in relation to these data have not yet ended. We will retain your personal data even after the end of these retention or limitation periods, insofar as the retention of these data is necessary for our establishment, exercise or defence of legal claims.

#### 6. Voluntariness of the Provision of your Personal Data:

The provision of your personal data is voluntary in principle. If you do not provide the personal data required for the abovementioned purposes 1a) - 1c), you may not be able to order from us or we may not be able to process this order.

### **Your Rights:**

#### What Rights do you have according to the Applicable Data Protection Laws?

You have the right, (i) to be informed by us, if we process your personal data and if yes, which personal data we process about you and to receive a copy of these data (Article 15 GDPR), (ii) to require us to correct, complete or delete your personal data, in case they are incorrect or are not processed according to the applicable legal requirements (Articles 16, 17 GDPR), (iii) under certain circumstances to require us to limit the processing of your personal data (Article 18 GDPR), (iv) under certain circumstances to receive your personal data in a structured, commonly-used and machine-readable format or to transfer these data to a third party (right to data portability, Article 20 GDPR) and (v) under certain circumstances to object to the processing of your personal data (Article 21 GDPR). If you want to exercise one or some of these rights, please do not hesitate to contact us.

Furthermore, you have the right to lodge a complaint with your Data Protection Authority, if you believe that your data protection rights have been infringed. You can find the contact data of the Austrian Data Protection Authority online at [www.data-protection-authority.gv.at](http://www.data-protection-authority.gv.at) and the contact details of the other EU Data Protection Authorities at [edpb.europa.eu/about-edpb/board/members.en](http://edpb.europa.eu/about-edpb/board/members.en).