

Privacy policy

Available in English only. Version in other languages will be available soon.

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1. Preamble

At Eder Strahltechnik part of WINOA Group, (including Elastikos (France) S.A.S, WINOA S.A. and their subsidiaries; collectively “Eder Strahltechnik”, “us”, “we” or the “Company”), your privacy is as important to us as it is to you. We have developed this policy, which is a public document available to anyone, because we want you to feel confident about the privacy and security of your personal information. This Privacy Policy provides information on how we collect, use and protect personal information.

“Personal information” means information about individuals, and from which individuals could be identified, directly or indirectly, including information which may be protected under the privacy or data protection laws of their country.

This Privacy Policy applies to anyone who interacts with us, in any way (for example, by email, through our website, by phone, by post, or through a Winoa app, social media, face to face or any other form).

Concerning employee personal information, please refer to our Employee Privacy notice.

This Privacy Policy is without prejudice to specific local data protection requirements and additional local privacy policies that may be posted on our websites, which may be included in our contracts or that may be notified to any third parties (customers, suppliers ...) from time to time in relation with our operations. If there is a conflict between the requirements under our Privacy Policy and local laws, you should comply with the most stringent requirement.

We reserve the right to review this Privacy Policy at any time. We encourage you to periodically review this Privacy Policy to stay informed about our personal information practices. The Privacy Policy was last reviewed and updated by the date referenced at the top of the document and is effective as of that date.

Eder Strahltechnik, as data controller, takes the privacy of your personal information seriously and ask that you read this Privacy Policy carefully as it contains important information on:

- The key points you need to know about how we collect and use your personal data
- What personal data we collect about you
- Why and with whom we share your personal data, and in which cases your personal data may be transferred abroad
- How we protect the security and confidentiality of your personal data
- The choices and rights available to you regarding our use of your personal data
- How you can contact us about our privacy practices and to exercise your rights

We collect and process the personal information necessary to conduct our activities and to develop or maintain business and contractual relationship in a business-to-business environment. It is Eder Strahltechnik’s policy to:

- Process personal information fairly, in a transparent manner and in accordance with applicable laws and tell you (either directly or in written policies) about how Eder Strahltechnik will use your personal information;
- Collect personal information for specified, explicit and legitimate purposes;
- Ensure that your personal information is adequate, relevant and limited to what is necessary in relation to the purpose for which it has been collected and processed;
- Not keep your personal information for longer than needed for the purposes for which it is processed;
- Keep your personal information secure, and limit the people who can access it;
- Take reasonable steps to ensure that the personal information we process is accurate and where necessary, is kept up to date.
- Ensure that you know how to access your personal information and exercise your rights in relation to it, and
- Ensure that any third party Eder Strahltechnik shares your personal information will take appropriate technical and organizational measures to protect it and ensure an appropriate level of security.

2. What personal information does Eder Strahltechnik collect from and about you?

Personal information that you provide us

Personal information we collect may include data pertaining to our employees, candidates, customers, suppliers, vendors or other business partners including their employees, contact people, or authorized users. In particular, we may collect and process the following personal information:

- Full name, gender, address, and contact details (such as telephone, mobile and fax numbers, email address);
- Function, position, job title;
- IP address;
- Online account details including username, password and other credentials used to access Eder Strahltechnik's products, services, including apps and websites;
- Financial and payment information such as banking details, financial situation, payment history, invoices and payment terms as well as any personal information for fulfilling our legitimate processing billing information;
- Complaints and enquiries;
- Business profile, sanction lists, tax identification or any other registration number allowing us to ensure existence, accuracy and safety of the business relationship;
- Responses provided in response to surveys;
- Any other information that is relevant to fulfil the valid purpose for which it was collected.

Personal information collected by automated means

We may also collect personal data by automated means - for example, when you use one of our applications, apps or visit our website - using technologies such as cookies, web server logs, IT logs, web beacons, and similar technologies as described below, without you actively submitting such information.

The types of personal data that we may collect through such automated means, to the extent permitted under applicable law and, where required, subject to your express consent, are:

- The date and time of visit, referring address (location from which a visitor comes to the websites);
- Type of Internet browser, OS and device details;
- Visitor's IP address (a unique number that is assigned to any computer that connects to the Internet for identification purposes);
- Images (CCTV)
- Traffic data for calls or Internet session when you use our phone or Internet services, including called numbers, identification of the phone, duration of the call, date, duration and data volume of the Internet session;
- As the case may arise location data generated during calls or Internet sessions;
- History of the contact you have had with our customer service.

Personal information collected by third parties

Eder Strahltechnik may also receive personal information from other sources, including third parties from whom we have purchased data, and combine this information with personal data we already have collected. This helps us to update, expand and analyze our data, identify new business partner or new opportunities, and create more tailored products and services that may be of interest to you.

3. How does Eder Strahltechnik use your personal information (purpose)?

Eder Strahltechnik uses, transfers and otherwise processes personal information for the following purposes, as described in this Privacy Policy or as otherwise permitted under applicable law, and in accordance with the legal basis set out below for a variety of purposes, including:

PURPOSES	LEGAL BASIS
<p>Managing human resources: Personal information about prospective employees and applicant is collected for human resources purposes when they apply for a job at Eder Strahltechnik via the Website, the application or any other forms. This includes identity and contact curriculum vitae (CV), your motivation letter if it was</p>	<p>Our legitimate interest to evaluate your skills and ability for the proposed job, and the need to take the necessary measures prior to entering into the employment contract.</p> <p>Our legitimate interest to mobilize and develop human resources to support the company's strategy.</p>

PURPOSES	LEGAL BASIS
<p>attached, the content of the message you sent us and our answer on whether your application may be suitable for available position;</p>	<p>The need to comply with our legal obligations.</p>
<p>Managing shareholder relationships: Personal information from shareholders is collected for purposes related to their shareholding in Eder Strahltechnik, including for the purposes of issuing or transacting in shares, paying dividends, regulatory reporting and shareholder communications. This personal information may include a shareholder's name, address, shareholding details, tax file number, and bank account details.;</p>	<p>The need to comply with our legal obligations</p> <p>Our legitimate interest to develop the relationship with the managing shareholders</p>
<p>Managing all aspects of our business relationships with customers, suppliers and other external third parties. Personal information about individuals within such external organizations is collected for business purposes such as supplying goods and services or purchasing goods and services, entering into and fulfilling contracts, communicating about our products, services and events, administering and improving our products and services, managing your enquiries, claims or complaints, responding to requests from authorities and complying with our contractual and legal obligations, and for other legitimate business purposes. Subject to individual consent where required by law, we may use your personal data to conduct marketing, promotional and informational activities to show you information that is of interest to you and to perform business analytics, satisfaction surveys or market</p>	<p>The need to comply with our legal obligations</p> <p>Our legitimate interest to develop and maintain our relationship with you, to improve the quality of our products and services and to better communicate with you concerning our services and products</p> <p>Your consent when required by law</p>

PURPOSES	LEGAL BASIS
research and conduct direct marketing.	
<p>Creating new business relationships with potential customers and suppliers or any other third party, for example when you express an interest in obtaining additional information about our products and services, or answer to a request for quotation or a tender, or register to use the our website(s), or register for an event, you provide us with personal information.</p>	<p>Our legitimate interest to develop and maintain our relationship with you, to improve the quality of our products and services and to better communicate with you concerning our services and products</p> <p>Our legitimate interest to answer your questions and to develop and maintain our relationship with you</p>
<p>Managing safety, security and other administrative, accounting, tax or legal obligations: Personal information is collected from visitors to our sites for safety and security purposes. We also collect personal information to exercise our rights, to defend ourselves from claims and to respect laws and regulations that apply to us and the third parties we work with (for example, to meet obligations under trade sanctions and export-control legislation and whistleblowing legislation), to administer our accounting and taxes obligations, to respond to requests from administrative or judicial authorities, to prevent and detect fraud or other crime.</p>	<p>The need to comply with our legal obligations</p> <p>Our legitimate interest to protect the company, its employees and its assets</p>
<p>Managing our websites and community relationships: Personal information can also be collected from members of communities for the purposes of engaging and interacting with communities linked with Eder Strahltechnik's activity or with Eder Strahltechnik's community. We also collect personal information to administer, operate, maintain, and improve the our websites, apps and any other services we offer, enforce or apply our website terms of use,</p>	<p>Our legitimate interest to develop and maintain our relationship with you</p> <p>The need to comply with our legal obligations</p>

PURPOSES	LEGAL BASIS
our policy terms and conditions or other contracts, or to protect our (or our customers' or other people's) rights, property or safety;	
Taking part in, or being the subject of, any sale, purchase, merger or takeover of all or part of the Eder Strahltechnik business.	<p>The need to comply with our legal obligations</p> <p>Our legitimate interest to develop our business</p>

In the view to offer the best and most adapted experience to our customers or potential customers, we may use personal data to conduct marketing, promotional and informational activities and to perform business analytics, satisfaction surveys or market research and direct marketing purposes in general, including sending notifications about updates to the websites, information on our services we think may be of interest to you, initiatives or events by mail, e-mail, phone, fax, SMS, MMS or other electronic means. However, we will only do so in accordance with GDPR requirements. If you no longer wish to receive marketing information, you will always be able to use the UNSUBSCRIBE option available in all our communication.

4. Who has access to your personal information? Why and with whom do we share your personal information?

Our policy is to not give, sell or otherwise distribute personal information we collect to third parties outside of Eder Strahltechnik, except where necessary and in accordance with applicable law or with your express consent if required. In line with this, we share personal data with the recipients listed below.

- **Within Eder Strahltechnik.** Your personal information can be accessed by relevant Eder Strahltechnik departments but only to the extent necessary to fulfil their respective tasks. Without prior written authorization of Eder Strahltechnik, employees and independent contractors of Eder Strahltechnik shall not, directly or indirectly, access, use for any purpose, disclose to anyone, publish, exploit, take, copy, alter, destroy, or remove from the offices of Eder Strahltechnik, nor solicit, allow or assist another person or entity to access, use, disclose, publish, exploit, take, copy, alter, destroy or remove from the offices of Eder Strahltechnik, any of your personal information or part thereof except: (1) as permitted in the proper performance of their duties for Eder Strahltechnik; (2) as permitted in the ordinary course of Eder Strahltechnik's business for legitimate business purposes; or (3) as otherwise required by applicable laws and/or regulations.

- **Other companies of Eder Strahltechnik Group.** We may share your personal data with other companies of the Eder Strahltechnik Group and in particular with our French companies where are located our corporate shared services.

As Eder Strahltechnik operates internationally, Eder Strahltechnik may need to make your personal information available to other Eder Strahltechnik entities and to external third parties such as:

- Third parties who provide products or services to Eder Strahltechnik
- Any company within Eder Strahltechnik group, for legitimate business purposes; and
- Any regulatory or legal authority, government agency or entity as required by applicable laws and regulations.

Eder Strahltechnik will comply with applicable laws and regulations in disclosing your personal information to third parties. In particular, when Eder Strahltechnik outsources the processing of your personal information to third parties or provide your personal information to third party service providers, Eder Strahltechnik prohibits them from using it for their own purposes or from disclosing it to others.

- **Third party service providers.** Your personal data may be disclosed to third party service providers, acting on our behalf, in connection with managing services, data analytics, finance, and accounting or other administrative services and information technology support or for the purposes of paying dividends or mailing shareholder communications.. These third party service providers will have access to – and process – personal data only on our behalf and under our instructions and will be held to appropriate security obligations. These third parties service providers are located in France, the United Kingdom and the United States.
- **Eder Strahltechnik's business partners** such as sales agents to allow us to provide the best offer to our customers.
- **Other data recipients.** For the above purposes or where otherwise required by law, we may also need to make personal data available to third parties such as advisors, banks and financial institutions, professionals, independent consultants, potential or existing investors and/or acquirers (in connection with a merger, acquisition, or sale involving Eder Strahltechnik or its affiliates or as part of a corporate reorganization, stock or asset sale, or other change in corporate control).
- **Regulatory and/or administrative authorities, courts, police authorities or other government bodies and authorities.** Eder Strahltechnik may provide information, in response to properly made requests, for the purposes of the prevention and detection of crime, and the apprehension or prosecution of offenders, when required to do so by law, for example under a court order, or in response to properly made court or administrative demands. Eder Strahltechnik may also provide information for the purpose of safeguarding national security. In either case, Eder Strahltechnik will act in accordance with applicable data protection Law.

We may also disclose personal data about you when you explicitly consent (via contract or other legal instrument) to such transfer or when we believe disclosure is necessary or appropriate for our legitimate interests (or those of the third party to whom we disclose your data), provided that they are not overridden by the data subject's interests or fundamental rights and freedoms, in accordance with applicable laws.

Please note that when you order goods and services from Eder Strahltechnik, we may make enquiries about you for credit reference purposes and your situation related to trade sanctions. These enquiries include searching your records held by a credit reference agency or trade sanction lists.

5. Will your personal information be transferred abroad?

We may need to transfer your personal data to other companies of Eder Strahltechnik Group, business Partners or other recipients identified in the "Why and with whom do we share your personal data?" previous section that are located inside and outside the European Economic Area ("EEA"), including in countries that do not provide the same level of protection for personal data as in the EEA. In any case, we will only transfer personal data to recipients that provide an adequate level of data protection or as permitted by applicable data protection laws by implementing appropriate safeguards, including, but not limited to, relevant data transfer agreements when needed.

6. How is your personal data protected?

Eder Strahltechnik has appropriate policies and technical and organizational measures in place to safeguard and protect your personal data against unlawful or unauthorized access, accidental loss or destruction, damage, unlawful or unauthorized use and disclosure. We will also take all reasonable precautions to ensure that our staff and employees who have access to personal data about you have received adequate training.

In addition, Eder Strahltechnik has adequate safeguards in place for the proper disposal of files and documents containing personal information, including, without limitation, the requirement that physical files and documents containing personal information be shredded or placed in the secured shredding containers at its facilities for proper disposal.

When Eder Strahltechnik uses third party organizations to process information on its behalf, they shall demonstrate their compliance with Eder Strahltechnik's security requirements, and with relevant data protection legislation throughout the time they work for Eder Strahltechnik.

In the event of a data breach, Eder Strahltechnik will notify local relevant authorities and the persons concerned, when required, in accordance with applicable laws and regulations.

7. How long do we keep your personal data for?

Eder Strahltechnik will keep your personal information in a secure environment for the time necessary to achieve the purposes for which it was collected or during the minimum retention period provided by the applicable legislation including civil, criminal and commercial law.

Eder Strahltechnik may, instead of destroying or erasing your personal information, make it anonymous such that it cannot be associated with or tracked back to you.

8. What happens when you provide us with personal data about third parties?

If you provide us with personal data about third parties, you warrant, represent, and undertake that you have complied with applicable data protection laws including informing and obtaining all necessary consents and approvals for the provision of such personal data to Eder Strahltechnik and the processing by Eder Strahltechnik of this personal data as described in this Privacy Policy.

9. What happens if you visit a linked website?

The information obtained by third party websites accessed via Eder Strahltechnik's website is not covered by this Privacy Policy and is governed by the terms applicable to your relationship with that third party, and Eder Strahltechnik accepts no responsibility or liability in respect of third party websites.

10. What are your data protection rights?

Under the General Data Protection Regulation ("GDPR") you have a number of rights with regard to your personal data. Those rights are as follows:

- **Right to Access** – You can ask to see the personal information Eder Strahltechnik holds about you. In connection with a request, Eder Strahltechnik may request specific information about you to enable us to confirm your identity and right of access, as well as search for and provide you with the personal information Eder Strahltechnik holds about you. Eder Strahltechnik may, in limited circumstances, charge you a fee to access your personal information. However, we will advise you of a fee in advance. There can be instances where applicable law or regulatory requirements allow or require Eder Strahltechnik to refuse to provide some or all of the personal information we hold about you. In addition, personal information may have been destroyed, erased or made anonymous. In the event we cannot provide you with access to your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.
- **Correction or Deletion of Personal Information** – Eder Strahltechnik works to ensure that personal information in its possession is accurate, current and complete. If you believe that the personal information Eder Strahltechnik holds on you is incorrect, inaccurate, incomplete or outdated, you may request the revision or correction of that information. If it is determined that personal information is inaccurate, incomplete or outdated, we will revise it and, unless it proves impossible or involves disproportionate efforts, inform other third parties, which were provided with inaccurate information, so records in their possession may be corrected or updated.
- **Withdrawal of Consent** – If you have provided consent for the processing of your data, you have the right (in certain instances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.

- **Objection to processing and direct marketing** – You have the possibility to object, on grounds relating to your particular situation, at any time to the processing of your personal data (in certain instances), including profiling. When profiling is related to direct marketing you always have a right to object and to object to receiving direct marketing.
- **Limitation to processing** – You have the right to obtain from us restriction of processing in certain instances as provided by data protection law.
- **Right to data portability** – You have the right to receive the personal data, which you have provided to us, in a structured, commonly used and machine-readable format when the processing is based on your consent or on a contract. You also have the right to ask us to transmit it to another data controller of your choice.
- **Complaints** - You have the right to lodge a complaint to the Data Protection Authority, if you believe that Eder Strahltechnik has not complied with the requirements of the applicable data protection legislation with regard to your personal information.

In case you wish to exercise any such rights, please send a written and signed request to Eder Strahltechnik as described under the "How can you contact us?" section below. Eder Strahltechnik will aim to respond within a reasonable period after the request is made or from when information required to process the request is received (or otherwise as required under local laws).

11. How to contact us?

If you have any questions, comments, complaints or suggestions in relation with this policy, or if you wish to exercise your rights under applicable data protection laws, please feel free to contact us, through our website or write to us at:

Eder Strahltechnik
Kranichbergstraße 16
2640 Gloggnitz Austria
or

WINOA Group Security Officer
WINOA
528 avenue de Savoie - BP3
38570 LE CHEYLAS
FRANCE

You can also use the contact form on our website: <https://www.strahltechnik.at>
<https://www.winoagroup.com/contact-Winoa-group>

Please note that Eder Strahltechnik may ask for a copy of an identity document to confirm your identity. From a country to another, the document may vary. In the same perspective, Eder Strahltechnik may also ask you questions to confirm your identity.