

# Privacy Policy

Kronoplus Limited and its affiliates respect your right to privacy in the online world when using this website and communicating electronically with us. Please read our Privacy Policy carefully so that you can understand how we collect and use personal data and other information that we obtain when you use this website. By proceeding in your use of this website, you automatically agree to the terms of this Privacy Policy.

For the purposes of this Privacy Policy, "this website" means the [www.kronospan-express.com](http://www.kronospan-express.com) website including all documents that may from time to time be on or part of this website, and also all other websites to which external links in this website refer, unless any such site is not provided by Kronoplus Limited or its affiliates or provides for privacy rules and policies that are different from this Privacy Policy; and "personal data" consists of information that can be used to identify you, contact you or draw up a personality or network profile of you (e.g., name, address, telephone number and email).

We have put together a list of FAQ that shall inform you of the measures that we take to maintain the privacy and security of the personal data and other information shared with us when you use our website. If you have any further questions concerning our use of your personal data and other information or any other queries with regard to our Privacy Policy, please contact [privacy@kronospan-express.com](mailto:privacy@kronospan-express.com).

Please find the relevant answer to any of the questions below.

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## **1. What does this Privacy Policy cover?**

This Privacy Policy covers our use of your personal data and other information which we receive from you when you use this website.

Websites of affiliates of Kronoplus Limited may contain privacy rules and policies which are different from this Privacy Policy. On your journey around the [www.kronospan-express.com](http://www.kronospan-express.com) site, please check the privacy rules and policies of each website which you visit and do not assume that this Privacy Policy applies to all sites to which this website contains links.

## **2. Who is responsible for the personal data collected on this website?**

The information you provide through this website is controlled by Kronoplus Limited (hereinafter also referred to as "we" or "us"), a company registered in Cyprus with the registration number HE 213658, whose registered office is at Grayoak House, Tagmatarchou Poulou 9, 1101 Ayios Andreas, Nicosia, Cyprus. You can reach us by e-mail at [privacy@kronospan-express.com](mailto:privacy@kronospan-express.com).

## **3. Do special rules apply if you are under the age of 18?**

If you are under 18 years old please do not send us your personal data (for example your name, address or email). If you are under 18 years old and you wish to ask a question or use this website in a way which requires you to submit your personal data, please do so in a way strictly related to the tasks assigned to you by your superiors as part of your profession and in coordination with your superiors, or do so through your parent or guardian.

## **4. Why and on what legal basis do we process personal data?**

We collect and process personal data in order to:

- respond to queries or requests submitted by you
- process orders or applications submitted by you
- administer or otherwise carry out our obligations in relation to any agreement you have with us
- anticipate and resolve problems with any goods or services supplied to you
- create products or services that may meet your needs
- conduct internal market research and tracking of sales data.
- informing you about our products and services, which may include contacting you by email or telephone
- giving the personal data to Kronoplus Limited affiliates and selected third parties allowing them to send you information which may be of interest to you (such as product or service information).

We process your personal data based on the following legal basis:

- Processing your personal data is necessary for the performance of a contract with you or at your request (Art. 6 (1) b) GDPR).
- Processing your personal data is necessary for the purposes of our legitimate interests or the legitimate interests of our affiliates and other third parties. (Art. 6 (1) f) GDPR).
- Based on your consent to process your personal data (Art. 6 (1) a) GDPR).
- Due to a legal obligation (such as legal retention obligations) (Art. 6 (1) c) GDPR).

## **5. May we use your personal data for further purposes and share it with third parties?**

In addition to the purposes stated under section 4 of this Privacy Policy, we may use your personal data for further purposes. , However, prior to such use, we will indicate to you that we may do so and on which legal basis we will proceed. To the extent you provide us with personal data, we will not transmit any such personal data to any third party, except

- to the extent you consented to such transmission: When data is collected you will be informed of the recipient or categories of recipients;
- as part of the processing of your inquiries and/or your orders and your use of our services: to subcontractors commissioned by us to whom we transmit only such data as is required to fulfill the respective assignment and such contractors shall use such data for specific purposes only;
- as part of processing activities pursuant to Article 28 of the GDPR: to external service providers whom we have selected diligently and have commissioned and who are bound by our instructions and by the provisions of the GDPR and are controlled on a regular basis; and
- in compliance with legal obligations: to parties authorized to obtain such personal data.

## 6. Do we collect and process automated data?

We may collect some information about your use of this App automatically. As with every other web service, our server collects information automatically and stores it temporarily in server log files if the app connects to our servers. In those event, we collect the following data which for technical reasons we need if we are to display the contents of the App to you and to ensure the stability and security thereof (legal basis: Article 6 (1) f) of the GDPR):

- the IP address of the computer from which the inquiry is sent;
- the file inquired about by the client;
- the http response code;
- the Internet page from which you are visiting (referrer URL);
- the date and time the server inquiry is sent;
- the type and version of the browser used; and
- the operating system on the computer sending the inquiry.

This website uses Google Analytics, a web analytics service provided by Google Inc. (hereinafter, “Google”). Google Analytics uses small text files, referred to as cookies, which are saved on your computer to facilitate analysis of your website use. The information generated by cookies regarding your use of this website typically is transmitted to and saved on a Google server located in the United States. If and when IP anonymization is activated on this website, Google will truncate your IP address for transmission among member states of the European Union or to other member states of the Agreement on the European Economic Area. Only in exceptional cases will your full IP address be transmitted to a Google server in the United States and then truncated. At the request of the operator of this website, Google will use the information to evaluate your use of this website, to compile reports on website activity, and to provide the operator of this website with other services relating to website activity and Internet use.

According to Google, the IP address transmitted from your browser as part of Google Analytics will not be merged with any other data held by Google.

You may refuse the saving of cookies by selecting the appropriate settings in your browser software; however, please note that if you do so you may not be able to use the full functionality of this website. In addition, you can object to Google’s collection of data generated by cookies which data relates to your use of this website (including your IP address) as well as to Google’s processing of the data. To do so, download and install the browser plug-in available at <http://tools.google.com/dlpage/gaoptout?hl=de>.

This website uses Google Analytics with the addendum `_anonymizeIp()`. This means that IP addresses are truncated before being processed and cannot be associated with individual persons. In the event a personal association to you of any data collected in connection with you is possible, such association is excluded without delay and the personal data is erased immediately.

We use Google Analytics regularly to analyze and enhance the use of our website. The resulting statistics allow us to improve our offerings and make them more interesting for you, the user. In exceptional cases in which personal data is transmitted to the United States, Google is bound by the EU-US Privacy Shield (<https://www.privacyshield.gov/EU-US-Framework>). The legal basis of our use of Google Analytics is Article 6 (1) p. 1 f) of the GDPR.

Information regarding the third-party provider is as follows: Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, fax: +353 (1) 436 1001; terms of use: <http://www.google.com/analytics/terms/de.html>; overview of data protection: <http://www.google.com/intl/de/analytics/learn/privacy.html>; privacy statement: <http://www.google.de/intl/de/policies/privacy>.

This website uses Yandex.Metrica web analytics provided by Yandex Oy Limited Company - Moreenikatu 6, 04600 Mantsala, Finland (hereinafter referred to as the “Yandex”).

Yandex.Metrica uses “cookies,” small text files placed on users’ computers to analyze user activity.

Information collected by cookies does not reveal your identity, but it can help us to improve our website performance. Information about your use of this website collected by cookies will be transferred to Yandex and stored on Yandex’s server in the EU and the Russian Federation. Yandex will process this information to assess how you use the website, compile reports for us on our website operation, and provide other services. Yandex processes this information as specified in the Terms of Use of Yandex.Metrica Service.

You can stop using cookies by making relevant adjustments in browser settings. You can also use the tool <https://yandex.com/support/metrica/general/opt-out.html>. However, it can affect some website functions. By using this website, you agree that Yandex can process your data in the above manner and for the above purposes.

We also use Hotjar in order to better understand our users’ needs and to optimize this service and experience. Hotjar is a technology service that helps us better understand our users experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don’t like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users’ behavior and their devices (in particular device’s IP address (captured and stored only in anonymized form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), preferred language used to display our website). Hotjar stores this information in a pseudonymized user profile. Neither Hotjar nor we will ever use this information to identify individual users or to match it with further data on an individual user. For further details, please see Hotjar’s privacy policy by clicking on this link.

You can opt-out to the creation of a user profile, Hotjar's storing of data about your usage of our site and Hotjar's use of tracking cookies on other websites by following this opt-out link.

On this website we use a plugin of the web analysis service of New Relic. It enables us to collect statistical evaluations about the speed of the website, determine whether the website can be accessed and how quickly the respective page is displayed when it is accessed. This service is provided by New Relic Inc. (188 Spear Street, Suite 1200 San Francisco, CA 94105, USA; "New Relic").

New Relic uses cookies. When a user accesses a website containing a New Relic plug-in, his browser establishes a direct connection to the New Relic servers. By integrating the plugin, New Relic receives the information that a user has called the corresponding page of the offer. If the user is logged in to New Relic, New Relic can assign the visit to his account at New Relic. However, if a user is not a member of New Relic, New Relic will store his IP address.

The purpose and scope of data collection and the further processing and use of the data by New Relic, as well as the relevant rights and setting options for the protection of the privacy of users, can be found in New Relic's data protection information: <https://newrelic.com/privacy>. New Relic is bound by the EU-US Privacy Shield (<https://www.privacyshield.gov/EU-US-Framework>). The legal basis of our use of New Relic is Article 6 (1) p. 1 f) of the GDPR.

If a user is a member of New Relic and does not want New Relic to collect data about him/her via this service and link to his/her membership data stored on New Relic, he/she must log out before visiting the New Relic website. You can object to the collection and storage of data for the purpose of web analysis at any time with future effect by deactivating cookies in your browser settings. Please consult the corresponding help file or help function of your browser.

The "AddThis" service from Oracle (500 Oracle Parkway, Redwood Shores, CA 94065, USA) is used within our online offer to share the contents of this online offer within social networks (so-called sharing). AddThis uses the personal information of users for the provision and execution of the sharing functions. In addition, AddThis may use pseudonymous information of users for marketing purposes. This data is stored on the user's computer using so-called "cookie" text files. For more information please read the AddThis Privacy Policy: <http://www.addthis.com/privacy>, you can opt-out of any tracking under: <http://www.addthis.com/privacy/opt-out>. Oracle is bound by the EU-US Privacy Shield (<https://www.privacyshield.gov/EU-US-Framework>). The legal basis of our use of AddThis is Article 6 (1) p. 1 f) of the GDPR.

## **7. Do we use cookies?**

We also collect anonymous, non-personal information about your use of this website through the use of "cookies," which are small computer files that we transfer to your computer's hard drive that allow us to know how often someone visits our website and the activities they conduct while on our website (such as the pages visited, etc.). Every computer is assigned a different cookie. The information collected by cookies helps us to dynamically generate advertising and content on this website specifically designed for you, and also allows us to statistically monitor how many people are using our website and for what purpose. We do not use cookies to store on your computer or to gather information related to your person. You can erase or block the cookie from providing information to us by changing the settings on your computer (please refer to your help screens or manuals). You do not have to accept our cookie in order to productively use our website. If you reject our cookie, however, some of the functions and conveniences of our website may not work properly.

## **8. What happens to information provided or exchanged using the different possibilities on our website?**

### General use of our Website

If this website offers any email, feedback, chat room notice board or newsgroup facilities, etc., we may collect the information that you provide or exchange through such facilities. Generally, your provision of your personal data to us through our App (your last name, first name, e-mail address and/or postal address) is voluntary. This data is used to let you use our facilities in the App, process your inquiries and/or your orders, The legal basis for this is Article 6 (1) b) of the GDPR or Article 6 (1) f) of the GDPR. Please note that we cannot be responsible for other parties' use of the information that you make available through such facilities. Please be careful about what personal information you disclose through such facilities.

### Newsletter

With your consent you can subscribe to our newsletter, with which we inform you about our current interesting offers. The advertised goods and services are named in the declaration of consent.

For the registration to our newsletter we use dedicated web-form. In addition, we store your used IP addresses and the time of registration and confirmation. The purpose of the procedure is to be able to prove your registration and, if necessary, to clarify a possible misuse of your personal data.

The only mandatory information for sending the newsletter is your e-mail address and name. The indication of further, separately marked data is voluntary and is used to be able to address you personally. After your confirmation we will save your data for the purpose of sending you the newsletter (legal basis is Art. 6 Par. 1 S. 1 lit. a DS-GVO).

You can revoke your consent to receive the newsletter at any time and unsubscribe from the newsletter. You can declare your revocation by clicking on the link provided in every newsletter e-mail or by e-mail to [privacy@kronospan-express.com](mailto:privacy@kronospan-express.com).

We would like to point out that we evaluate your user behaviour when sending the newsletter. For this analysis, the e-mails sent contain so-called web beacons or tracking pixels, which represent single-pixel image files stored on our website. For the evaluations we link the data mentioned in Article 6 above and the web beacons with your e-mail address.

### Applying for Job Opportunities

Within the scope of our career page you can apply for unsolicited or specific job offers. For this we offer you the possibility to use our application portal. You also have the opportunity to register in our application portal. Your data (name, e-mail address, contact details, application documents) will only be processed within the scope of the respective job advertisement (Art. 6 para. 1 lit. b) DSGVO, § 26 BDSG) or within the scope of your consent for use for further job offers (Art. 6 para. 1 lit. a) DSGVO). If you have given us your consent to process your application data, you can do so at any time.

Note on sensitive data: We expressly draw your attention to the fact that applications, in particular CVs, certificates and other data submitted by you to us, may contain particularly sensitive information about mental and physical health, racial or ethnic origin, political opinions, religious or philosophical beliefs, memberships in a trade union or political party or about sex life.

If you provide us with such information in your online application, you expressly agree that we may process this data for the purpose of processing your application. These data will be processed in accordance with this Privacy Policy and other relevant legislation.

The data transmitted will be deleted in the event of rejection or negative notification of your application no earlier than 3 months after the end of the application procedure. This does not apply if legal provisions oppose the deletion or if further storage is necessary for the purpose of providing evidence or if you have agreed to longer storage.

## **9. How can you ensure that your personal data remains accurate?**



We aim to keep our personal data about you as accurate and up-to-date as possible. If we are aware that your data is incorrect, we will contact you to get the correct information or - if not possible - delete your data. However, you have the possibility to review or change the personal data collected about you. Therefore, please contact us as set out below under section 15 ("How can I contact you?").

## **10. Is your personal data secured and how long do you store my data?**

We have implemented technology and policies with the objective of protecting your privacy and the information collected from your use of this website from unauthorised access and improper use and will update these measures as new technology becomes available, as appropriate.

We will erase the data collected from you when saving such data no longer is required or, depending on statutory retention obligations, we will restrict the processing of such data. The legal basis for this is Article 6 (1) b) of the GDPR or Article 6 (1) f) of the GDPR.

## **11. What happens to your personal data submitted to other websites?**

We cannot be responsible for the privacy policies and practices of websites of parties that are not affiliates of Kronoplus Limited or of websites providing for privacy rules and policies that are different from this Privacy Policy, even if you accessed such a third party website using links from this website or you were linked to our website from such a third party website. We recommend that you check the policy of each website you visit and contact the owner or operator of such websites if you have any concerns or questions.

## **12. Who is responsible for personal data of others provided to us?**

From time to time this website may ask you to provide personal data of other persons, for example your friends or colleagues, so that we can send them information of our products and services. Before providing such personal data, please ensure that you have obtained their consent to their personal data being used in this way. Such personal data of other persons we will also use in accordance with this Privacy Policy.

## **13. Can we change the Privacy Policy?**

The internet is a dynamic, rapidly developing environment. In the future, we may make significant changes to our gathering and use of information through this website, which may

require changes to this Privacy Policy. If we make any substantial changes to this Privacy Policy that affect the way in which we use your personal data, we will post these changes on this website. We may also make non-significant changes to our Privacy Policy that do not affect our use of your personal data. Please check our Privacy Policy on a regular basis so that you stay updated. By continuing your use of this website after such a change to our Privacy Policy, you automatically agree to the changed terms of this Privacy Policy.

## **14. Can we send personal data abroad?**

Kronoplus Limited has affiliates all over the world, which maintain databases in different jurisdictions. Kronoplus Limited may therefore transfer your data to its affiliates and outside partners abroad. If the level of privacy protection assured by law in a foreign country does not comply with internationally recognized standards according to the list published by the Swiss Federal Data Protection Commissioner or has an adequate data protection level recognized by the European Union, we ensure that your data will be transferred to databases in such countries only if the receiving party has agreed to keep your personal data equally confidential and secure (by entering into model contract clauses e.g.).

## **15. What rights do you have and how can you contact us?**

You have the following rights vis-à-vis us regarding your personal data. You have the right to

- access,
- rectify or erase,
- restrict processing,
- object to processing, and
- portability.

If you would like to contact Kronoplus Limited about your rights, please contact our webmaster [[privacy@kronospan-express.com](mailto:privacy@kronospan-express.com)].

In addition, you have the right to lodge a complaint with a data protection supervisory authority if you are not satisfied with our processing of your personal data.

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