Privacy Policy

Last Updated: September 2019

1. Introduction

At Sharp Electronics GmbH ("we", "us", "Sharp"), we take your privacy seriously. The following privacy policy outlines who we are as a data controller, what data we collect on our websites, how and why we collect it, and your rights to control that data.

2. Name and Address of the Data Controller

The data controller for the purposes of the GDPR, other data protection laws applicable in Member states of the European Union and other provisions related to data protection is:

Sharp Electronics GmbH Nagelsweg 33-35 20097 Hamburg

Phone: 040-2376 0

Email: <u>datenschutz.seg@sharp.eu</u> Website: <u>https://epc.sharp.eu/</u>

2.1 Contact to the controller's Data Protection Officer

You may, at any time, contact our Data Protection Officer directly with all questions and suggestions concerning data protection.

Email: Dataprotection.seg@sharp.eu

3. Collection of personal data and general information

Our Website collects the following data:

Contact details: information that allows us to contact you such as your name, email address, telephone number and addresses associated with your account, order or query. Furthermore, registration data is required to maintain your user account and to assign relevant orders being placed.

Purchase and account history: records relating to the products which you have purchased. Personal data in reports and notifications you submit to us: if you submit information to us about our products through our website, we will collect any personal data you include.

Communication with us: when you contact us, we will keep a record of this.

How you use our website: Our website collects a series of general data and information when a user or automated system calls up the website. This general data is stored in the server log files. We may collect (1) the browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (so-called referrers), (4) the sub-websites, (5) the date and time of access to the Internet site, (6) an Internet protocol address (IP address), (7) the Internet service provider of the accessing system, and (8) any other similar data and information that may be used in the event of attacks on our information technology systems.

We do not draw any conclusions about the user from the website data. Rather, this information is needed to (1) deliver the content of our website correctly, (2) optimize the content of our website, (3) ensure the long-term viability of our information technology systems and website technology,

and (4) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack. Therefore, the controller analyses anonymously collected data and information statistically, with the aim of increasing the data protection and data security of our enterprise, and to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

4. Legal basis for the processing

Purpose of processing	Categories of data	Legal basis of	Data storage period
 -verification of business relationship between your company and us providence of user account, assignment of ordering, sell-to and ship-to parties upon orders communication between you and us on orders delivery management, providence of the web shop 	processed - Contact data (eg. first name, last name, phone number, email address) - System log data (IP- address, time of your visit)	Fulfilment of a contract between us	10 years

6. How we share your information

We share your personal information with the following:

Our staff: Your personal data will be accessed by our staff but only where this is necessary for their job role.

Companies in the same group of companies as us: For the purpose of business-relationship verification and processing your orders centrally.

Shipping Partners: For the purpose of delivery of goods like eg. logistics providers.

External service providers: Sharp uses an external service provider to assist with, for example, information technology and other administrative support services to operate this website.

Law enforcement and regulatory agencies: if we are required to disclose or share your Personal Data in order to comply with any legal obligation or any regulatory requirement

The government or our regulators: Where we are required to do so by law or to assist with their investigations or initiatives, including the Information Commissioner's Office.

Police and law enforcement: To assist with investigation and prevention of crime.

We do not disclose personal information except as set out above.

7. Changes of Business Ownership and Control

We may transfer, sell or assign any of the information described in this Privacy Policy to third parties as a result of a sale, merger, consolidation, change of control, transfer of assets or reorganization of our business. Where we are involved in a merger, acquisition or sales of assets, we will always process your data in line with your rights and freedoms and subject to confidentiality agreements between the parties.

8. Transfer of personal data

We do not transfer your personal data to any countries outside of the EU or EEA.

9. Cookies

Our webpages use "cookies". Cookies are text files that are stored in a computer system via an Internet browser.

Through the use of cookies, we can provide our website users with more relevant services and content that would not be possible without the cookie setting. Find out more information about our <u>Cookie Policy</u>.

10. Profiling

Profiling involves the analysis of personal data (e.g. digital behavior such as pages visited, links clicked, downloads) in an automated way, to identify or predict behavior in website users.

We do not currently use profiling on our website. If we start any profiling activity, we will notify you specifically that we are using profiling.

11. Registration

Placing orders requires a registration on our website. This personal data (e.g. name, email address, date and time of registration) is captured to provide them with this service, verify their identity, and provide them with a secure log in to a protected web environment. Identification ensures ordered goods will be shipped to the correct and verified delivery address. It also allows Sharp to provide access or deny access due to misuse of service.

Users can also submit personal information by submitting a general enquiry (e.g. a sales or service enquiry) via a form. In doing so, the personal data transmitted is automatically stored via email to the recipient contact at Sharp. Such personal data is transmitted on a voluntary basis and is stored for the purpose of contacting the data subject to fulfil their enquiry.

This data may also be passed on to Sharp group companies and partners to fulfil the enquiry.

12. Tracking & Analytics

We do not collect any tracking or analytics data on this website.

13. Rights of the data subject ("you").

You have the following rights to control your data according to GDPR principles:

Right of confirmation – this means the ability to find out from us if we are processing data about you.

Right of access – this means the ability to see what data is being held about you (also called Subject Access Request). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

Right of rectification – this means the ability to change or alter any incomplete or inaccurate data we hold about you.

Right to erasure – this means the ability to be removed from our databases/ systems where: there is no good reason for us continuing to process it, you withdraw your consent, we are unlawfully holding your personal data or we should erase your data to comply with applicable EU law. You have a right to ask us to delete or remove your personal information where you have exercised your right to object to processing.

Right to restriction of processing – this means the ability to limit or suspend what personal data is processed.

Right to data portability – this means the ability to move the data to another supplier **Right to object** – this means the ability to prevent your personal data being processed in a certain way or remove consent. There is a specific provision to be able to object separately to data profiling.

To exercise your rights to any of the above, please contact us via email at: <u>datenschutz.seg@sharp.eu</u>

- We will always aim to help you when you wish to exercise your rights but in some instances, we
 may have lawful grounds to reject your request.
- We will investigate any request you make without undue delay and in any event within one month
 of receipt of your request. That period may be extended by two further months where necessary,
 taking into account the complexity and number of requests. We shall inform you of any such
 extension within one month of receipt of the request, together with the reasons for the delay.
- In the event that we decide to not take action on the request, we will inform you of the reasons for not taking action.
- Lodging a complaint with the supervisory authority: if you do not agree with a decision we make in
 relation to a rights request or believe that we are in breach of applicable data protection laws,
 then you can lodge a complaint with a data protection supervisory authority in the EU. You can
 contact the controller's data protection supervisory authority in Hamburg using its contact details
 on its website https://datenschutz-hamburg.de/ or seek guidance with your national supervisory
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14. Updates to this Policy

We may update this privacy policy from time to time to reflect changes in the way we process personal data (e.g. if we implement new systems or processes that involve the new uses of personal data) or to clarify information we have provided in this notice. Our changes will be in accordance with applicable data protection laws.

We recommend that you check for updates to this notice from time to time, but we will notify you directly about changes to this notice or the way we use your personal data when we are legally required to do so.