

# **FERDINAND KREUTZER**

## **Sabamühle GmbH**

Raw materials for food and semi-luxury foods  
Beverages and pharmaceuticals - spice mill



Obligation to provide information in accordance with Art. 13 and 14 GDPR  
in relation to the processing of customer and potential-customer data

### **Data processor**

---

Name and contact data of the responsible party:

Mr Fabian Frank  
Ferdinand Kreutzer-Sabamühle GmbH  
Burgbernheimer Straße 11  
90431 Nuremberg  
Tel.: 0911/324720, Email: info@saba.de  
Nuremberg Commercial Register HRB387  
VAT ID No. DE 133514741

Name and contact data of the data protection officer:

Ms Gisela Pöllinger  
Datenschutz Pöllinger GmbH  
Dresdner Str. 38  
92318 Neumarkt  
Tel.: 09181/2705770  
Email: datenschutz@datenschutz-poellinger.de

### **Processing framework**

#### **Purpose and legal basis of the processing**

#### **Art. 6, Section 1 a) b) f) GDPR**

---

**Customer / potential-customer data:** The collection, processing or use of personal data is carried out to fulfil the business purpose, such as pre-contractual measures (e.g. to prepare offers, process enquiries) to fulfil contractual obligations (order, contract, payment processing, invoicing), to supply goods and services (Art. 6 Section 1 b GDPR), as well as to maintain the business contact and to inform the customer / potential customer about new products and services (Section 1 f GDPR) as well as for prize draws. Furthermore, there is a legal obligation to process data (e.g. due to tax law requirements) (Art. 6 Section 1 c GDPR).

Categories of personal data processed

#### **The main data categories are:**

- name
- address
- contact data of contact persons in the company (first name, surname)
- communication data (telephone number, mobile number, email address, fax number)
- customer number as well as order and delivery data for the purpose of initiating contracts
- order and contract data (for the purpose of implementing the order)

# FERDINAND KREUTZER

## Sabamühle GmbH

Raw materials for food and semi-luxury foods  
Beverages and pharmaceuticals - spice mill



- invoicing and payment data (bank details)

### Origin (source) of the data

---

The stored data is collected within the scope of our contractual relationship, as well as for initiating contracts and individual orders, or created within the scope of business relations and business initiation. The data is stored for the fulfilment and processing of orders placed with us as well as to comply with commercial and tax documentation and archiving obligations. The data is collected from input in the ERP system, signatures from emails and documents. In this respect, your data will be processed on the basis of Article 6 Section 1 b, c, f GDPR.

### Recipients (categories) of personal data

---

**Public bodies** that receive data on the basis of statutory regulations:

- financial authorities

**Internal departments** that are involved in the execution of the relevant business processes:

- accounting, quality assurance, purchasing, sales, warehouse/vehicle fleet and IT.

**External bodies** (contractual partners) as far as these are necessary for the fulfilment of the contract. External contractors (service providers) in accordance with Art. 28 GDPR for the processing of data on our behalf.

- IT service providers, website hosters, software providers, waste disposal companies, Google, multifunction printer service providers, advertising agencies

**Other external bodies:** companies within the group or other external bodies for the fulfilment of the above-mentioned purposes, provided that the data subject has given his/her written consent, that this is necessary for the fulfilment of the contract or that transmission is permissible for an overriding legitimate interest:

- banks, auditors, freight forwarders, parcel services, lawyers, credit agencies

### Transfer to third countries

---

If we transfer personal data to service providers outside the European Economic Area (EEA), the transfer will only take place if the third country has been confirmed by the EU Commission to have an adequate level of data protection or if other appropriate data protection guarantees (e.g. binding internal company data protection regulations or EU standard contract clauses) are in place.

### Duration of storage / deletion

---

#### **After the statutory retention period:**

Obligation to provide information

# FERDINAND KREUTZER

## Sabamühle GmbH

Raw materials for food and semi-luxury foods  
Beverages and pharmaceuticals - spice mill



10 years	annual financial statements, opening balance sheets, commercial and business books, records, work instructions, organisational documents, invoices and accounting documents (Germany's HGB, AO, EstG, KStG, GewStG, UStG, AktG, GmbHG, GenG legislation)
6 years	commercial and business correspondence and other documents (HGB, BGB)
30 years	enforceable instruments

### The following data will be deleted in accordance with Art. 17 GDPR if:

- data storage is no longer necessary
- the data subject has revoked consent to data processing
- the data has been processed unlawfully
- there is a legal obligation to delete under EU or national law.

### Restriction of processing in accordance with Article 18

If, in the case of non-automated data processing, deletion is not possible or only possible with disproportionate effort because of the special type of storage and if the interest of the data subject in the deletion is to be regarded as low, the data subject will have no right and the responsible party no obligation to delete personal data in accordance with Article 17 Section 1 of Directive (EU) 2016/679, supplementary to the exceptions referred to in Article 17 Section 3 of Regulation (EU) 2016/679. In this case, the restriction on processing in accordance with Article 18 of Regulation (EU) 2016/679 will replace deletion. Sentences 1 and 2 will not apply if the personal data has been processed unlawfully.

### Rights of the data subject

---

- Information about your personal data stored (Art. 15 GDPR) In particular, you may request information about the purposes of processing, the category of personal data, the categories of recipients to whom your data has been or will be disclosed, the planned storage period, the existence of a right to rectification, deletion, restriction of processing or objection, the existence of a right of appeal, the origin of your data, if it has not been collected by us, and the existence of automated decision-making including profiling and, if applicable, meaningful information on their details.
- Correction - if incorrect personal data is processed (Art. 16 GDPR).
- Deletion and restriction as well as objection against the processing (Art. 17, 18 and 21 GDPR).
- The right of data transferability (Art. 20 GDPR) You have the right to receive the personal data you have provided to us in a structured, common and machine-readable format or to request its transfer to another responsible party.
- Revocation of consent (Art. 7 Section 3 GDPR). As a result, we will no longer be allowed to continue processing data based on this consent in the future.
- Right of appeal to the competent supervisory authority (Art. 77 GDPR).



## Right of objection

---

If your personal data is processed on the basis of legitimate interests pursuant to Art. 6 Section 1 P. 1 f GDPR, you have the right to object to the processing of your personal data pursuant to Art. 21 GDPR, provided that there are reasons for this which arise from your particular situation or the objection to direct advertising. In the latter case, you have a general right of objection, which we will implement without the specification of a particular situation.

## Right to revoke consent

---

Within the meaning of Art. 6 Section 1 a or Art. 9 Section 2 a, each data subject has the right to revoke consent provided for the fulfilment of a contract at any time and without any disadvantage to him/ her or prejudice to the legality of the processing carried out on the basis of the consent until revocation.

### **Please address any revocation of consents and objections in writing to:**

Peter Rieck  
Ferdinand Kreutzer-Sabamühle GmbH  
Burgbernheimer Straße 11  
90431 Nuremberg  
Email: [datenschutz@saba.de](mailto:datenschutz@saba.de)

## Automated decision-making and profiling

---

**No** automated procedures for decisions according to Art. 22 GDPR or other profiling measures according to Art. 4 No. GDPR are used.

Up-to-date status and amendment of this duty to inform according to Art. 13 and 14 GDPR

---

This duty to provide information on data protection is currently valid and has the status as of Oktober 2019.

Among other things, it may be necessary to change this information due to changes in legal or official requirements. The current obligation to provide information on data protection can be viewed and printed out at any time on the website:  
<https://www.sabamuehle.de/datenschutz.html>.

---