

## DATA PROTECTION INFORMATION FOR CLIENTS AND BUSINESS PARTNERS

Information about the Processing of Personal Data of our Clients and Business Partners according to Article 13, 14, and 21 General Data Protection Rules (GDPR)

### Hahn Cargo Services GmbH

According to Article 13, 14, and 21 GDPR, we would like to inform you herewith about the processing of personal data we collected about you as well as about your rights according to EU data protection law. The personal data processed depends mainly on the requested or agreed services. In order to ensure, that you are completely informed of the processing of your personal data, please take the following information into account.

#### 1. Identity and contact details of the controller

Hahn Cargo Services GmbH  
Building 870  
D-55483 Hahn- Airport  
Germany

phone: +49 (0) 6543 - 509 934 + 936  
fax: +49 (0) 6543 - 50 99 33  
e-mail: [info@hahn-cargo-services.de](mailto:info@hahn-cargo-services.de)  
website: <https://www.hcs-hahn-airport.de/>

#### 2. Contact details of the data protection officer

ffp digital consulting GmbH  
data protection officer  
Building 890  
D-55483 Hahn-Airport  
e-mail: [datenschutz@hahn-cargo-services.de](mailto:datenschutz@hahn-cargo-services.de)

#### 3. Purposes for the processing for which the personal data are intended as well as the legal basis for the processing

Your personal data is processed in compliance with the European GDPR and the according German legislation, the so called Bundesdatenschutzgesetz (BDSG), as long as this is required in the context of contractual or pre-contractual relations. If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as is the

case, for example, when processing operations are necessary for the supply of goods or to provide any other service, the processing is based on Art. 6 (1) lit. b. The same applies to such processing operations which are necessary for carrying out pre-contractual measures, for example in the case of inquiries concerning our services.

Art. 6 (1) lit. a GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose (e.g., third party data forwarding, marketing analysis, or promotional contact). A consent given can be withdrawn at any time for all future processing operations (see no.9 of this data protection information).

In case it is required and permitted by law, we process your data according to Art. 6 (1) lit. c GDPR if our company is subject to a legal obligation by which processing of personal data is required. Moreover, processing operations could be based on Art. 6 (1) lit. f GDPR, if the processing is necessary for the purposes of the legitimate interests pursued by our company or by a third party, except where such interests are overridden by the interests r fundamental rights and freedoms of the data subject which require protection of the personal data. If needed any required by law, we will inform you separately about the specific purpose of the legitimate interest.

In the context of our householder's rights as well as per the legally required security measures for airfreight handling, video surveillance is in place on our company grounds. The data processing operations is based on our legitimate interest according to Art. 6 (1) lit. f GDPR in combination with § 4 BDSG as well as on the security measures of participants of the secure delivery chain according to Art. 6 (1) lit. f GDPR in combination with § 9a LuftSiG.

#### 4. Categories of personal data

We only process data in the context of contractual or pre-contractual relations as part of our business as a handling agent. More concrete, general data and contact data of you or of other persons in your company (name, address, contact data etc.) is in scope to be processed as well as, if needed, additional data, that you, your employer or our joint business partner provided to us in the context of contractual or pre-contractual relations (identification data).

#### 5. Data sources

We process personal data, that we received in the context of contractual or pre-contractual relations by you or by our business partners in order to fulfil the contract in our role as handling agent.

## 6. Categories of recipients of the personal data

Within our company, your personal data is only forwarded to those departments and persons, where the data is mandatory in order to fulfill contractual or legal duties or to enforce our legitimate interest.

Your personal data is processed on our behalf based on a commission contract according to Art. 28 GDPR. In this context, we ensure, that the processing of personal data complies to GDPR. The categories of recipients are IT service partners, document and file destruction companies, as well as logistics software providers.

Data forwarding to recipients outside of our company only takes place if this complies with legal requirements, the forwarding is required in order to fulfil the contract, your declaration of consent is on hand or we are authorized to provide information. Under these prerequisites, recipients of personal data may be

- Airport operators (Frankfurt Hahn Airport)
- Recipients, to whom the data forwarding is required in order to fulfil the contract, i.e., finance services, transport services, business partners in the delivery chain
- Tax advisor
- Public bodies and institutions (i.e., prosecution, police, regulators, tax authorities, aviation federal office) in case of a legal requirement or a regulation requirement.

## 7. Data forwarding in a third country

Data forwarding of personal data into countries outside of the European Economic Area or to an international organisation only takes place if this is mandatory to fulfil the contract or if it is legally required. In this case, recipients could be i.e., local handling agents, logistics companies, airlines.

## 8. Duration of data storage

Where required we process your personal data for the time of our business contract relation, respectively for the fulfilment of contractual purposes. This includes also pre-contractual situations.

Furthermore, we are liable to several obligations to preserve records according to German economic laws such as Handelsgesetzbuch (HGB) and (AO). The periods according to the aforementioned laws are two to ten years.

Additionally, the data storage period depends on limitation periods according to law, that are generally three years, according to i.e., §§ 195 ff Bürgerliches Gesetzbuch (BGB), but may also last up to thirty years in specific cases.

## 9. Rights of the data subject

Each data subject has a right to access the personal data concerning him or her according to Art. 15 GDPR, a right to rectification according to Art. 16 GDPR, a right to erasure according to Art. 17 GDPR, a right to restriction of processing according to Art. 18 GDPR, a right to notification obligation regarding rectification or erasure of personal data or restriction of processing according to Art. 19 GDPR as well as a right to data portability according to Art. 20 GDPR.

Moreover, each data subject has a right to lodge a complaint with a supervisory authority according to Art. 77 GDPR, if the data subject considers that the processing of personal data relating to him or her infringes the regulation. The right to lodge a complaint exists independent of other remedies.

In case the processing of data is based on a consent, you have the right to withdraw your consent at any time. Please take into account, that the withdrawal is only valid for the future. Processing operations that took place before your withdrawal are not touched. Please also keep in mind, that we need to preserve specific data in order to fulfil legal obligations (see no. 8 in this document).

If the processing operations of your personal data is based on our legitimate interest according to Art. 6 (1) lit. f GDPR, you have the right to object on grounds relating to your particular situation, at any time according to Art. 17 GDPR. We will then immediately stop processing this personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms for the establishment, exercise, or defense of legal claims.

Please contact us to reserve your rights.

## 10. Requirement to provide personal data

The provision of personal data in the context of contractual or pre-contractual relations is usually neither legally required nor contractually mandatory. As a result, you are not obliged to provide your personal data. Nevertheless, in case you don't provide us with the required data, we may not be able to take a decision in the context of contractual actions.

## 11. Automated decision making

We don't use automated individual decision making or profiling as per Art. 22 GDPR in any of our business processes.