

# Data protection statement

## 1. Controller as defined by data protection legislation

The controller as defined by data protection legislation, in particular the EU General Data Protection Regulation (GDPR), is:

Klüber Lubrication München SE & Co. KG  
Geisenhausenerstrasse 7  
81379 Munich  
Germany  
Tel.: +49 89 78 76-0  
Fax: +49 89 78 76-333  
E-mail: [info@klueber.com](mailto:info@klueber.com)

Klüber Lubrication München SE & Co. KG (hereinafter referred to as “Klüber Lubrication”) is a globally operating company and part of the Freudenberg Group. Personal data is processed by Klüber Lubrication employees, national sales companies and affiliated companies.

For data processed in countries outside the EU, Klüber Lubrication uses EU standard agreements, including suitable technical and organisational measures, to ensure that your personal data is processed in accordance with the European level of data privacy.

An overview of subsidiaries within the corporate group is available here: <https://www.klueber.com/en/contact/klueber-lubrication-subsidiaries/>

Other special recipients are specified during the respective processing activities.

## 2. Your rights as the data subject

You may use the above contact details to exercise the following rights at any time:

- Information about your data stored by us and the processing of it (Art. 15 GDPR)
- Correction of incorrect personal data (Art. 16 GDPR)
- Erasure of your data stored by us (Art. 17 GDPR)
- Restriction of data processing if we are not yet permitted to erase your data due to legal obligations (Art. 18 GDPR)
- Objection to the processing of your data with us (Art. 21 GDPR)
- Data portability if you have consented to the data processing or have concluded a contract with us (Art. 20 GDPR)

If you have given us your consent, you may revoke it at any time with effect for the future.

Automated decision-making or profiling pursuant to Art. 22 GDPR does not take place.

You can file a complaint with a supervising authority at any time, e.g. with the competent supervising authority of the federal state in which you reside or with the competent authority that oversees us as the controller.

A list of regulatory authorities (for the non-public area) with address details is available at:

[https://www.bfdi.bund.de/DE/Infothek/Anschriften\\_Links/anschriften\\_links-node.html](https://www.bfdi.bund.de/DE/Infothek/Anschriften_Links/anschriften_links-node.html).

### **3. Processing activities within the MyKlüber app**

Note: Such processing only takes place if you use the MyKlüber app. If you only use the Efficiency Manager, the processing activities specified here will not be carried out and therefore do not apply to you.

#### **3.1. Registering in the MyKlüber app**

##### **Type and purpose of processing:**

When you register for the use of our personalised services, we collect several items of personal data, such as your first name, surname, contact and communication details (e.g. phone number and e-mail address), country, employer, user ID. Once you are registered with us, you can access our contents and services, which are only available to registered users, e.g. further information on our products. Registered users may also change or erase any of the data they specified when registering by request at any time (with the exception of the country). Over and above this, you are welcome to request from us information on any of your personal data stored by us, and you may do so at any time.

##### **Legal basis:**

Data entered during registration is processed on the basis of the user's consent (Art. 6 (1) (a) GDPR).

##### **Recipients:**

This data is provided to the following departments within our company: IT and other departments that provide servicing for the application.

Data recipients may include technical service providers who are responsible for the operation and maintenance of our application as processors.

##### **Storage period:**

Data will only be processed in this context for as long as the corresponding consent applies. It will then be deleted unless statutory retention obligations apply. To contact us on this issue, please use the contact details provided at the end of this data protection statement. Data will be deleted at the latest three years from the end of the year following the user's last login.

### **Prescribed or required provision:**

You provide your personal data on a voluntary basis, based solely on your consent. We will not be able to provide you with access to the contents and services offered additionally without the provision of your personal data.

## **3.2. Product scan**

### **Type and purpose of processing:**

If the user has registered in the application, data collected when scanning the product, such as first name, surname, contact and communication details (e.g. phone number and e-mail address), country, employer, will be stored and linked to the scan. This helps us assign the product scan to a user. If you have also agreed to location determination (see below), your position at the time of scanning will also be stored.

The data is collected in anonymised form before the personal reference is deleted at the end of the storage period. A personal reference can no longer be created following this.

### **Legal basis and legitimate interest:**

Data received via the product scan is processed on the basis of a legitimate interest (Art. 6 (1) (f) GDPR).

This processing takes place in order to trace the route of a product. This allows you to identify the source of counterfeiting according to the principle of exclusion. This results in increased product and workplace safety. This also allows the relevant documents (product data sheets, safety instructions etc.) to be provided in the correct language and according to the legal requirements.

### **Recipients:**

This data is provided to the following departments within our company: IT and other departments that provide servicing for the application.

Data recipients may include technical service providers who are responsible for the operation and maintenance of our application as processors.

### **Storage period:**

Personal data is deleted at the latest three years after collection.

### **Prescribed or required provision:**

You provide your personal data on a voluntary basis. We cannot provide you with any further information on the scanned product if you do not enter your personal data.

### **3.3. Location determination**

#### **Type and purpose of processing:**

If location determination is agreed, the location of the scanning device will be processed upon capture of the product. This is used to determine the route our products will take. In addition, this helps us identify counterfeiting and incorrect labelling.

The exact GPS position and date/time are collected. The data is collected in anonymised form before the personal reference is deleted at the end of the storage period. A personal reference can no longer be created following this.

#### **Legal basis:**

Data entered during localisation is processed on the basis of the user's consent (Art. 6 (1) (a) GDPR).

#### **Recipients:**

This data is provided to the following departments within our company: IT and other departments that provide servicing for the application.

Data recipients may include technical service providers who are responsible for the operation and maintenance of our application as processors.

#### **Storage period:**

Data will only be processed in this context for as long as the corresponding consent applies. It will then be deleted or anonymised unless statutory retention obligations apply. To contact us on this issue, please use the contact details provided at the end of this data protection statement. Data will be deleted at the latest after three years from the end of the year following collection.

#### **Prescribed or required provision:**

You provide your personal data on a voluntary basis, based solely on your consent. If you do not provide your personal data, we cannot track the routes our products take, making it more difficult to tackle counterfeiting and incorrect labelling effectively.

### **3.4. Feedback form**

#### **Type and purpose of processing:**

The data you enter is processed for the purpose of individual communication with you and to enhance our application.

#### **Legal basis and legitimate interest:**

We process the data entered in the contact form on the basis of a legitimate interest (Art. 6 (1) (f) GDPR).

The purpose of the contact form is to provide you with a simple way to make contact and to evaluate the use of our offer. The information you provide is stored in order to respond to your enquiry and any follow-up questions.

If you contact us to request a quotation, the data entered in the contact form will be processed in order to implement pre-contractual measures (Art. 6 (1) (b) GDPR).

### **Recipients:**

This data is provided to the following departments within our company: IT and other departments that provide servicing for the application.

Data recipients may include technical service providers who are responsible for the operation and maintenance of our application as processors.

### **Storage period:**

Enquiry data and analysis data will be deleted at the latest 3 years after the processing of the enquiry. You can informally object to the storage and collection of your data at any time.

If a contractual relationship is concluded, we will be subject to the statutory retention periods and will delete your data after six or ten years.

### **Prescribed or required provision:**

You provide your personal data on a voluntary basis. However, we can only process your enquiry if you communicate your name, e-mail address and the reason for your enquiry.

## **3.5. Transmission of error reports**

### **Type and purpose of processing:**

If a scanned barcode cannot be found in the system, you have the option of sending an error report containing additional information to Klüber Lubrication.

### **Legal basis and legitimate interest:**

The data entered in the error report is processed on the basis of a legitimate interest (Art. 6 (1) (f) GDPR).

This report helps identify counterfeiting and helps effectively prevent such cases. In addition, errors can be identified in the system or app in this way.

### **Recipients:**

This data is provided to the following departments within our company: IT and other departments that provide servicing for the application.

Data recipients may include technical service providers who are responsible for the operation and maintenance of our application as processors.

**Storage period:**

Data is deleted at the latest three years after processing.

**Prescribed or required provision:**

You provide your personal data on a voluntary basis. However, we can only process errors and try to eliminate them going forward if you provide us with relevant information.

### **3.6. Transmission of app analytics data**

**Type and purpose of processing:**

If consent has been given to the transmission of app analytics data, data on user behaviour will be processed in order to improve app functions, optimise the product verification process and provide new features. This also covers regional particularities in app usage. This data contains information on the device, useful life, user behaviour on the whole and after updates or new features, user ID, location and other information if applicable.

The data is collected in anonymised form before the personal reference is deleted at the end of the storage period. A personal reference can no longer be created following this.

**Legal basis:**

Data entered during registration is processed on the basis of the user's consent (Art. 6 (1) (a) GDPR).

**Recipients:**

This data is provided to the following departments within our company: IT and other departments that provide servicing for the application.

Data recipients may include technical service providers who are responsible for the operation and maintenance of our application as processors.

**Storage period:**

Data is anonymised as quickly as possible following collection; this takes place at the latest six months after collection.

**Prescribed or required provision:**

You provide your personal data on a voluntary basis. However, we can only make effective improvements to the application going forward if you allow us to process the necessary information in this regard.

## **4. Processing activities within the Efficiency Manager**

Note: Such processing only takes place if you use the Efficiency Manger. If you use only use the MyKlüber app, the processing activities specified here will not be carried out and do not therefore apply to you.

### **4.1 Using the service platform**

#### **Type and purpose of processing:**

We obtain the first name, surname, name of the organisation, as well as the e-mail address and user-defined password within the scope of registration. Provided that further users are registered in user management, we likewise obtain first name, surname and the e-mail address. You use your e-mail address and password to log in to the Efficiency Manager. Function/position, department and telephone number are provided voluntarily.

The EfficiencyManager user can save maintenance tasks with or without allocation of a user/user group. Personalised allocation to maintenance tasks will not be evaluated by Klüber Lubrication München SE & Co. KG, when applied.

#### **Legal basis:**

Data entered during registration is processed on the basis of the user's consent (Art. 6 (1) (a) GDPR).

#### **Recipients:**

This data is provided to the following departments within our company: IT and other departments that provide servicing for the application.

Data recipients may include technical service providers who are responsible for the operation and maintenance of our application as processors.

#### **Storage period:**

Data will only be processed in this context for as long as the corresponding consent applies. To contact us on this issue, please use the contact details provided at the end of this data protection statement. Data will be deleted at the latest three years from the end of the year following the user's last login.

### **Prescribed or required provision:**

You provide your personal data on a voluntary basis. We will not be able to provide you with access to the contents and services offered additionally without the provision of your personal data.

## **4.2 Encryption**

In order to protect your data during transmission, we use the latest encryption technology.

## **4.3 Processors used**

An external cloud partner has been commissioned by the controller to process personal data.

## **4.4 Changes to our data protection regulations**

We reserve the right to adjust this data protection statement so that it is always compliant with the latest statutory requirements or in order to make changes to our services in the data protection statement e.g. when introducing new services. The new data protection statement will then apply the next time you use the application.

## **4.5 Questions to the person responsible for data protection**

If you have any questions about data protection, please send us an e-mail or contact the person responsible for data protection directly:

Data protection officer of Klüber Lubrication München SE & Co. KG  
c/o activeMind AG  
Potsdamer Str. 3  
80802 München (Germany)  
+49 89 919294-900  
[datenschutz@klueber.com](mailto:datenschutz@klueber.com)



## **Information on your right to object according to Art. 21 GDPR**

### **Individual right to object:**

You have the right to object, on grounds relating to your particular situation, at any time to the processing of personal data concerning you, which is based on Art. 6 (1) (f) GDPR (data processing on the basis of a balancing of interests).

If you file an objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for its processing, which override your interests, rights and freedoms, or such processing is used for the establishment, exercise or defence of legal claims.

### **Recipients of an objection:**

The objection can be filed without any form requirement using the subject “Objection” and specifying your name and address, and should be sent to:

Klüber Lubrication München SE & Co. KG  
Geisenhausenerstrasse 7  
81379 Munich  
Germany  
Tel.: +49 89 78 76-0  
Fax: +49 89 78 76-333  
E-mail: [info@klueber.com](mailto:info@klueber.com)