



## Huchtemeier's guideline for personal data protection

Protection of personal data is taken very seriously at Huchtemeier Papier. We are committed to fulfill all relevant aspects that derive from the EU data protection directive as of May 2018.

It is absolutely necessary that all Huchtemeier employees and management understand and comply to the regulations of this guideline.

### 1. Data protection officer (DPO)

Data protection officer in Huchtemeier Papier is Moritz Vosschulte. You may contact the DPO under [privacy@huchtemeier.com](mailto:privacy@huchtemeier.com) in any case that you have doubts concerning Huchtemeier's compliance to data protection regulations or that you feel uncertain concerning any aspect of data protection or that you have ideas how to improve the protection of personal data at Huchtemeier.

### 2. Definition of personal data

Affected by this regulation is only personal data and not data in general. Personal data is connected to a single natural person. Examples for personal data are: Name, address, email-address, phone-number, date of birth, „name of wife“. Very critical personal data are e.g. political or sexual orientation. Within Huchtemeier there is no reason to collect or store such critical personal information.

### 3. Personal data minimization

Huchtemeier will store only such data, that is necessary to perform our regular business activities. Data like „name of daughter“ or a „customer's birthday" can be stored offline or memorized. However, in our systems we keep personal data to a minimum.

As a rule of thumb you may memorize:

**„At Huchtemeier we collect and store no more personal data than typically found on a business card“.**



## 4. Third parties

In general you must never share personal data with any external / third party.

In cases where an exchange of personal data with a third party is necessary, a data processing agreement „DPA“ must be exchanged and signed by both parties.

Before sharing any personal data with a third party, you must make sure that a DPA between Huchtemeier and the third party exists.

A draft for new DPAs and a list of all companies with existing DPAs can be found in Google Drive , folder HP Allgemein / data protection.

In case of any doubt if certain data can be exchanged with a certain third party please contact your data protection officer.

## 5. Existing personal data

Personal data that exists already in our systems can be used, if it is necessary to fulfill business obligations or pre-contractual activities (like exchange of offers). In case that the relevant data fulfills neither purpose, it must be deleted or the person affected must confirm its agreement to processing his or her data in written form.

## 6. Huchtemeier's systems to store personal data

At Huchtemeier you may use the following systems to collect and store personal data:

- MS Windows file storage („normal“ file storage of your computer and terminal server)
- MS Outlook (local or terminal server)
- Mesonic Winline
- HP WebApp
- Offline

You must NOT store any personal information in the following systems:

- Google drive
- Evernote
- Wunderlist
- Trello

At a later stage these systems maybe cleared for personal data treatment. This is subject to the existence of a DPA between Huchtemeier and the service provider.



**It is critical that all user-accounts are secured with cryptic passwords.**

E.g. „Huchtemeier2018“ is not an acceptable password for any account.

A secure password should...

...consist of minimum 8 characters

...include numbers and symbols

...include upper and lower case letters like

...note relate to the user

## 7. Information for existing business contacts

Existing business contacts will be informed as part of our email signatures in all correspondence. Please, everybody add the following sentence to your email signature:

*As of may 25th 2018 the new EU data protection directive (GDPR) is in place. Huchtemeier Papier takes data protection seriously and is committed to comply with all relevant regulations. Please visit [huchtemeier.com/privacy](http://huchtemeier.com/privacy) to learn how Huchtemeier protects your personal data and your connected rights. In case you have questions or suggestions regarding Huchtemeier's personal data protection, please contact [privacy@huchtemeier.com](mailto:privacy@huchtemeier.com).*

*Ergänzung für die deutsche Emailsignatur:*

*Am 25. Mai 2018 tritt die EU Datenschutzgrundverordnung (DSGVO) in Kraft. Huchtemeier nimmt den Schutz Ihrer persönlichen Daten äußerst ernst und verpflichtet sich allen Anforderungen der DSGVO nachzukommen. Bitte besuchen Sie [huchtemeier.com/privacy](http://huchtemeier.com/privacy) für ausgiebige Informationen zum Schutz Ihrer Daten. Sollten Sie Fragen oder Hinweise zum Datenschutz bei Huchtemeier haben, freuen wir uns über Ihre Nachricht unter [privacy@huchtemeier.com](mailto:privacy@huchtemeier.com).*

## 8. Information for new business contacts

Whenever a new business contact is established, the contact person must give us their agreement in written form (preferably via email) that we are allowed to process his or her personal data according to our data protection regulations. The Email must be stored in the HP WebApp and the corresponding date-field („Privacy-terms agreed on:“) in the WebApp's contact page must be filled with the date on which the agreement received us.

Please use the following phrases to require permission to process personal data:

**English**



Dear....

for an efficient cooperation we need to process your personal data (e.g. name and email address) in our IT systems. According to the EU data protection directive as of Mai 2018, we need your permission to store and process your data as described in our privacy-terms ([www.huchtemeier.com/privacy](http://www.huchtemeier.com/privacy)). **Please confirm that you accept those regulations and permit the use of your personal data as described.** You may withdraw your permission at any time or request information about the storage of your personal data.

**Deutsch**

Sehr geehrte...

Huchtemeier Papier nimmt den Schutz Ihrer persönlichen Daten sehr ernst.

Damit wir unsere Zusammenarbeit effektiv gestalten können, müssen wir Ihre personenbezogenen Kontaktinformationen (z.B. Name und Emailadresse) digital erfassen. Dafür benötigen wir entsprechend der EU Datenschutzrichtlinien Ihre Zustimmung. **Bitte bestätigen Sie uns, dass Sie unsere Datenschutzrichtlinien unter [www.huchtemeier.com/privacy](http://www.huchtemeier.com/privacy) zur Kenntnis genommen haben und einer wie dort beschriebenen Verwendung Ihrer Daten zustimmen.** Sie haben jederzeit das Recht sich nach Umfang und Art der Speicherung zu erkundigen bzw. uns zur Löschung Ihrer Daten aufzufordern.

## 9. Employee's declaration

I herewith declare that I have read, understood and will comply to all before mentioned regulations.

Place, Date, Name, Signature