# Privacy policy

(state: 20.04.2021)

This information gives you an overview of how your personal data is processed when you visit the website https://rewe-group-packaging.com/ and use WAVE.

## 1. Who is responsible for data processing?

The parties responsible for processing your personal data when you visit the website are

- REWE Markt GmbH (Domstraße 20, 50668 Köln, +49221-149-0, impressum@rewe-group.com),
- Penny Markt GmbH (Domstraße 20, 50668 Köln, +49221-149-0, impressum@rewe-group.com),
- REWE-Beteiligungs-Holding International GmbH (Stolberger Str. 92, 50933 Köln, +49221-149-0, impressum@rewe-group.com),
- REWE România SRL (Str. Buşteni nr. 7, Ştefăneştii de Jos 077175, Jud. Ilfov, Romania, contact@penny.ro, +40 0800110111),
- Penny Market S.r.l. con unico socio (Strada Padana Superiore 11 n. 2/b, 20063 Cernusco sul Naviglio, Italy, info@pennymarket.it, +39 02 9272 41),
- Penny Market s.r.o. (Počernická 257, 250 73 Radonice, Czechia, info@penny.cz, +420 284 096 111),
- REWE GROUP Magyarország PENNY MARKET divízió (Penny utca 2, Alsónémedi, 2351, Hungary, uyfelszolgalat@penny.hu, +36 29 339 345) and
- Billa Aktiengesellschaft Abteilung Penny (Industriezentrum NÖ-Süd, Straße 3, Objekt 16, 2355 Wiener Neudorf, Austria, servicecenter@penny.at, +43 0800 / 600 507).

#### 2. Who can you contact if you have questions about data processing?

You can direct any questions regarding the processing of your data to the data protection officer by mail (Domstraße 20, 50668 Cologne) or by e-mail (datenschutz@rewe.de or datenschutz@penny.de).

# 3. Which of your data do we process?

When you visit our website, we record data in server logs. These logs contain among others the following data: Connection data of the requesting computer including the IP address, the date and duration of the visit, the identification data of the browser and operating system type used as well as the website from which you visit us. We also process your log-in data (e-mail address and password).

You can manage your contact data in your user profile and optionally upload a photo of yourself. If you are a supplier, your contact data (name, e-mail address, professional telephone number and business address) from our business partner address directory will be processed by creating your person in WAVE. REWE Group employees register for WAVE via JIRA (name, e-mail address, company, department, phone number).

If you use WAVE, we record which entries and additions you have made in WAVE, which documents you have uploaded or downloaded, which tasks you have completed, which requests you have sent to the others. All "job"-responsible persons have access to the job history including the processor.

#### 4. For what purposes and on which legal basis do we process your data?

Your data will be processed for the following purposes:

- to enable access to our website (connection establishment),
- to guarantee the IT security of our website and to log the use of our website and
- to document the packaging development in order to parry possible legal consequences (e.g. from product liability)

Furthermore, we evaluate processing times for control and statistical purposes. The results are used by the specialist department for continuous improvement of the process and the IT system. For this purpose,

the data is anonymized and only evaluated on an aggregated base at the level of the specialist departments involved (e.g. marketing, QA, agency, supplier).

The legal basis for the described data processing is Art. 6 Para. 1 lit. f) GDPR (balancing of interests, based on our interest in ensuring the security of our IT systems and recording access or use for verification purposes and to parry possible legal consequences).

#### 5. Who has access to your data and for what reason?

Your data collected by us will not be passed on to third parties and your personal data will not be processed outside the European Union / European Economic Area. External companies for programming, development, maintenance and support of software applications that help us to fulfil our tasks are given access to your data. External companies engaged by us must meet special confidentiality requirements. They will only be granted access to your data to the extent and for the period of time necessary for the performance of their tasks.

#### 6. How long is the data stored?

In general we only store your data for as long as we need it for the respective processing purposes. The server logs are anonymized before the expiry of legal periods. Your user profile and log-in data will be stored for the duration of your authorization for the system. Due to traceability reasons all entries, additions, tasks, up- and downloads and inquiries are stored with the corresponding processor note for ten years on a regular base.

#### 7. Automated decision making / profiling

We do not use your personal data for automated decision making or profiling.

### 8. What rights do you have?

Information: You can request information about your personal data processed by us.

**Correction:** If your information is not (or no longer) correct, you can request the correction of your data. If your data is incomplete, you can request its completion.

**Deletion:** You have the right to request the deletion of your personal data. Please note that a claim for deletion depends on the existence of a legitimate reason. Furthermore, there must not be any regulations that oblige us to keep your data.

**Restriction of processing:** You have the right to request a restriction of processing of your data. Please note that the right to limit the processing depends on the existence of a legitimate reason.

Objection: You have the right to object to the processing of your data for reasons arising from your particular situation. In the event of a justified objection, we will no longer process your data.

**Right of complaint:** You have the right to file a complaint with a data protection supervisory authority if you do not agree with the processing of your data.

**Data transferability:** You have the right to receive personal data that you have communicated to us in an electronic format.