

# General Data Privacy Policy from KRIWAN Industrie-Elektronik GmbH

## Preamble

The INTspector app (henceforth “app”) has been made available by

KRIWAN Industrie-Elektronik GmbH  
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Email: info@kriwan.de  
Website: <https://www.kriwan.com>  
(henceforth “KRIWAN” or “we” or “us”)

as a controller as defined by the relevant and applicable data privacy law.

When using the app your personal data shall be processed by us. Personal data are understood to comprise all information relating to an identified or identifiable natural person.

The aim of the information contained in this document is to inform you about which personal data we process when you use the app and how we handle these data. We further inform you of the legal bases for the processing of your data and, if processing is required for the safeguarding of our legitimate interests, we shall also inform you of our legitimate interests. If we are not responsible for the processing of your personal data within the app, or via the app, this shall be stipulated in the Data Privacy Policy below.

You can retrieve this Data Privacy Policy at any time under the menu option “Data Privacy” within the app.

## 1. Information about the processing of your personal data

### 1.1. Data processing when downloading the app

When you download the app from an app store, the requisite information such as user name, email address and the customer number of your account, time of the download and the individual device number will be transferred to the app store. This is not carried out by us but it forms part of your usage relationship with the respective app store. We have no influence on this data transfer and we do not process any data in this context. Nor, to that extent, are we the controller. You can read more about this in the data privacy notices of the respective app store.

### 1.2. Requisite technical data for use of the app

If you want to use our app, we shall process the following technically required data in order to provide you with the app functions and to ensure the stability and security of its use:

- IP-address
- Browser information
- Device-IDs
- Software version

- Software build number
- App login data

These data shall be stored solely for technical reasons in order to ensure the functionality of our app and are not assigned to a specific person at any time.

The legal basis for the data processing is GDPR Article 6 (1), Sentence 1 (b) and (f).

The data shall be deleted automatically at the latest after 7 days.

## **2. Categories of recipients**

We handle your data confidentially. Within KRIWAN your data shall only be accessed by those departments and employees who require it for the fulfilment of the purposes mentioned above.

We shall only transfer personal data to third parties if this is necessary for the aforementioned purposes and is permitted by law or if you have given your prior consent.

In addition to the recipients specifically named above, we also work with other service providers (processors) to assist with the provision of the app.

The following recipient categories may receive data

- IT service providers
- Data storage and processing services

The data collected by the app will be stored on the servers of an external IT service provider with a location in Germany.

Our service provider will only process these data if this is required for the fulfillment of its service obligations and it complies with our instructions in relation to these data.

To ensure that processing complies with data protection and privacy legislation, we have concluded a contract data processing agreement with our service provider.

## **3. Data provision**

With the exception of the data required technically to use the app, all data provision by you is voluntary. However, it may arise that individual functions of the app will not function correctly if you have not provided us with the requisite data for this purpose. Should under exceptional circumstances this not be the case, it shall be explicitly stipulated at the relevant place in the Data Privacy Notice.

## **4. Data storage period**

We shall delete or anonymize your personal data as soon as they are no longer required for the purposes for which we collected or used them in accordance with the above clauses. As a rule we store your personal data for the duration of the use or contractual relationship via the app, plus a period of 3 months, during which we retain backup copies after deletion unless these data are required for a longer period for criminal prosecution purposes or to secure, assert or enforce legal claims.

Specific details in this Data Privacy Policy or legal requirements regarding the retention and erasure of personal data, in particular those which we must retain for fiscal law reasons, shall remain unaffected.

## **5. Your rights as a data subject**

### **5.1. Right to information**

You have the right at all times, upon request, to obtain information from us about your personal data that has been processed by us within the scope of GDPR Article 15. To do this please send your request by post or by email to the address given below.

### **5.2. Right to rectify incorrect data**

You have the right to demand from us the immediate rectification of your personal data if these should be incorrect. To do this please contact the contact addresses supplied below.

### **5.3. Right to erasure**

You have the right, pursuant to the provisions described in GDPR Article 17, to demand that we erase your personal data. These provisions specify in particular a right to erasure when the personal data are no longer necessary for the purposes for which they were collected or otherwise processed; they shall also apply in cases of unlawful processing and when there is an objection or erasure obligation in accordance with the law of the European Union or a Member-State, to which we are subject. See Clause 5 of this Data Privacy Policy for the data storage period. To assert your right to erasure, please contact the contact addresses supplied below.

### **5.4. Right to restriction of processing**

You have the right to demand the restriction of processing from us pursuant to GDPR Article 18. This right shall exist in particular when the accuracy of the personal data is disputed between the user and us and for the period required to verify the accuracy and in the event that the user with an existing right to erasure demands a right to restricted processing instead of erasure. It shall also exist where the data are no longer required for the purposes pursued by us, but where the user requires them for the establishment, exercise or defense of legal claims and also where the successful exercise of an objection between us and the user is still disputed. To assert your right to restriction of processing, please contact the contact addresses supplied below.

### **5.5. Right to data portability**

You have the right to receive from us the personal data that you provided to us in a structured, commonly used machine-readable format pursuant to GDPR Article 20. To assert your right to data portability, please contact the contact addresses supplied below.

### **5.6. Right to object**

You have the right at any time, pursuant to GDPR Article 21, to object on grounds relating to your particular situation, to the processing of your personal data that has been performed, pursuant to GDPR Article 6 (1) (e) or (f). We shall then cease processing of your personal data

unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or when the processing is for the purpose of establishing, exercising or defending legal claims.

#### **5.7. Right of revocation**

You can revoke your consent for the collection and use of your personal data at any time, without affecting the lawfulness of processing based on consent or other reasons for permission before its revocation. The revocation is to be addressed to: [info@kriwan.de](mailto:info@kriwan.de).

#### **6. Right of lodge complaint**

You also have the right to lodge a complaint with the competent supervisory authority. The competent body is the State Commissioner for Data Protection and Freedom of Information of the State of Baden-Württemberg.

#### **7. Contact and Data Protection Officer**

Should you have any questions or comments regarding our handling of your personal data or as a data subject you want to exercise your rights as stated in Clauses 6 and 7 please contact [info@kriwan.de](mailto:info@kriwan.de)

You can contact our data protection officer through the following contact details:

Company Priolan  
Ulrich Jahnke  
u.jahnke@priolan.de  
Gottlieb-Daimler-Straße 9  
74076 Heilbronn

#### **8. Changes to this Data Privacy Policy**

We always update this Data Privacy Policy to the latest version. Therefore, we reserve the right to change it from time to time and to update changes in the collection, processing and use of your data. The current version of the Data Privacy Policy can always be consulted under “Data Privacy” from within the app.

**Status:** May 2021