

## Data protection policy for the performance of the after-sales services for Lidl products

You have contacted Lidl in connection with a product purchased at Lidl, of which we are the manufacturer. Lidl has passed on your service inquiry to us for processing. In relation to the handling of personal data in connection with the processing of your service inquiry, we hereby advise you as follows:

### Section 1 Information on the collection of personal data when using the service hotline

(1) In the following we provide information about the collection of personal data during the implementation of after-sales services (guarantee, warranty, service inquiries) Personal data means all data that relate to you personally, e.g. name, address, email addresses.

(2) The responsible party under Art. 4 Para. 7 of the EU General Data Protection Regulation (GDPR) is HOYER Handel GmbH, Kühnehöfe 12, 22761 Hamburg, Germany

Tel.: +49 40 853994-80

Email: [office@hoyerhandel.com](mailto:office@hoyerhandel.com)

Website: <https://www.hoyerhandel.com/>

(3) You can contact our Data Protection Officer at [Datenschutz@hoyerhandel.com](mailto:Datenschutz@hoyerhandel.com) or our postal address plus "Der Datenschutzbeauftragte" (The Data Protection Officer).

(4) If we involve any external service providers commissioned by us for individual functions of our services, or if we wish to use your data for commercial purposes, we will inform you in detail below about the relevant procedures.

### Section 2 Your rights

(1) As regards your personal data, you have the following rights in your dealings with us:

- right to information,
- right to correction or deletion,
- right to restrict processing,
- right to object to processing,
- right to data portability.

To exercise your rights, you can contact either the responsible party (see above) or the Data Protection Officer (see above).

(2) Moreover, you have the right to complain to a data protection supervisory authority about the processing of your personal data by us.

### Section 3 Collection of personal data by LIDL

- (1) The company Lidl (Lidl Stiftung & Co. KG | Stiftsbergstraße 1 | 74167 Neckarsulm | Germany) has forwarded your call to the Lidl service hotline, or your written inquiry to the service centre, to us – as the manufacturer of the product to which your service inquiry relates - for further processing. In the process, Lidl has forwarded to us the data collected within the framework of the inquiry. These are the following personal data:

- Last name, first name
- Salutation
- Address
- Email address
- Telephone number
- Ticket number
- Ticket number including country code
- Article number (IAN)
- Article number (EAN)
- Article description
- Creation date of the complaint
- Problem description
- Contact language
- Purchase date
- Purchase price
- possibly proof of purchase
- possibly description of damage
- possibly call-back time
- possible further comments within the framework of data collection

We process these data in order to offer you the desired service, and to be able to perform a consultation, repair or replacement. The data collection has taken place on the grounds of justified interests (Art. 6 Para. 1 Clause 1 lit. f GDPR). In the present case, this consists in the performance of the services you have requested (handling of the guarantee or warranty claims, answering other device-related service inquiries).

We delete the data collected in this context once it is no longer necessary to store it (replacement/repair/elimination of the problem/responding to the service inquiry), or we restrict its use where statutory retention obligations exist.

#### **Section 4 Our own collection of personal data**

If it is determined during the course of the service consultation that your contact data as collected by Lidl (email address, telephone number, salutation) are incorrect, and/or that additional information is required for characterising the service inquiry (problem description, perhaps an article number (EAN), perhaps a model ID, perhaps a problem code/description), we will collect these data.

We process these data in order to offer you the desired service. The data collection has taken place on the grounds of justified interests (Art. 6 Para. 1 Clause 1 lit. f GDPR). In the present case, this consists in the performance of the services you have requested (handling of the guarantee or warranty claims, answering other device-related service inquiries).

We delete the data collected in this context once it is no longer necessary to store it (replacement/repair/elimination of the problem/responding to the service inquiry), or we restrict its use where statutory retention obligations exist.

#### **Section 5 Objection or cancellation of processing of your data**

(1) If you have consented to the processing of your data, you may withdraw such consent at any time. Such a withdrawal of consent will affect the permissibility of your personal data being processed, after you have informed us of this.

(2) Where we base the processing of your personal data on the balancing of interests, you may object to its processing. This is the case if its processing is not required in particular for fulfilling a contract with you as described by us in the relevant description of the functions below. When you exercise your right to object, you will be requested to give the reasons why we should not process your personal data in the manner we intend. In the event of your justified objection, we will review the facts and either cease to process your data, or adjust data processing, or demonstrate to you our compelling legitimate grounds for continuing to process your data.

To exercise your rights, you can contact either the responsible party (see above) or the Data Protection Officer (see above).

### **Section 6 Recipients of the personal data**

Within the framework of the statutory authorisations, it is permitted to disclose your personal data to the following companies within the EU:

- teknihall Elektronik GmbH | Breitefeld 15 | 64839 Münster | Germany
- LetMeRepair Central Services GmbH | Fichtestrasse 1a | 02625 Bautzen | Germany
- T.D.M. Telefon-Direkt-Marketing GmbH | Käthe-Paulus-Straße 12 | 31157 Sarstedt | Germany
- DHL Express Germany GmbH | Heinrich-Brüning-Str. 5 | 53113 Bonn | Germany
- UPS Deutschland S.à r.l. & Co. OHG (UPS) | Görlitzer Straße 1 | 41460 Neuss | Germany
- focs GmbH | Kühnehöfe 20 | 22761 Hamburg | Germany
- KOMSA Kommunikation Sachsen AG | Niederfrohnaer Weg 1 | 09232 Hartmannsdorf | Germany

**You have contacted our service hotline in connection with a product which we manufacture. In relation to the handling of personal data in connection with the processing of your service inquiry, we hereby advise you as follows:**

### **Section 1 Information on the collection of personal data when using the service hotline**

(1) In the following we advise you about the collection of personal data when using our service hotline. Personal data means all data that relate to you personally, e.g. name, address, email addresses.

(2) The responsible party under Art. 4 Para. 7 of the EU General Data Protection Regulation (GDPR) is

HOYER Handel GmbH, Kühnehöfe 12, 22761 Hamburg, Germany

Tel.: +49 40 853994-80

Email: [office@hoyerhandel.com](mailto:office@hoyerhandel.com)

Website: <https://www.hoyerhandel.com/>

(3) You can contact our Data Protection Officer at [Datenschutz@hoyerhandel.com](mailto:Datenschutz@hoyerhandel.com) or our postal address plus "Der Datenschutzbeauftragte" (The Data Protection Officer).

(4) If we involve any external service providers commissioned by us for individual functions of our services, or if we wish to use your data for commercial purposes, we will inform you in detail below about the relevant procedures.

### **Section 2 Your rights**

(1) As regards your personal data, you have the following rights in your dealings with us:

- right to information,
- right to correction or deletion,
- right to restrict processing,
- right to object to processing,
- right to data portability.

To exercise your rights, you can contact either the responsible party (see above) or the Data Protection Officer (see above).

(2) Moreover, you have the right to complain to a data protection supervisory authority about the processing of your personal data by us.

### **Section 3 Collection of personal data when calling the service hotline**

(1) When you contact us via our service hotline, we collect the following data:

- Last name, first name
- Salutation
- Address
- Email address
- Telephone number

- Ticket number / reference
- Article number
- Article description
- Problem description
- Brand / business unit
- Contact language
- Purchase date
- possibly purchase price
- possibly proof of purchase
- possibly description of damage
- possibly bank details
- possibly cause of fault
- possible further comments relating to complaint handling

## (2) Call records

As far as we record conversations, you will be informed of this procedure by an automatic announcement ahead the conversation.

You have the option of opposing the recording of your call to our customer hotline by indicating at the beginning of the call that you do not want a recording.

The call recording is carried out by our service provider T.D.M. Telefon-Direkt-Marketing GmbH (see also § 6 Recipient of personal data) on our behalf.

The conversation is recorded so that we can prove the progress and content of the conversation if necessary. Further reasons are measures for employee training and coaching as well as for the improvement of our internal processes.

These reasons represent a legitimate interest; the legal basis for data processing is Article 4 of the General Data Protection Regulation (GDPR).

The conversations are stored for 6 months, after which the data is deleted.

We process these data in order to offer you the desired service, and to be able to perform a consultation, repair or replacement. The data collection takes place on the basis of a contract (Art. 6, Para. 1 Clause 1 lit. b GDPR), where this relates to the assertion of claims for cancellation, warranty or guarantee rights. The performance of the customer service is otherwise subject to processing on the grounds of justified interests (Art. 6 Para. 1 Clause 1 lit. f GDPR), because it facilitates a successful customer service consultation.

We delete the data collected in this context once it is no longer necessary to store it (replacement/repair/elimination of the problem/responding to the service inquiry), or we restrict its use where statutory retention obligations exist.

## **Section 4 Objection or cancellation of processing of your data**

(1) If you have consented to the processing of your data, you may withdraw such consent at any time. Such a withdrawal of consent will affect the permissibility of your personal data being processed, after you have informed us of this.

(2) Where we base the processing of your personal data on the balancing of interests, you may object to its processing. This is the case if its processing is not required in particular for fulfilling a contract with you as described by us in the relevant description of the functions below. When you exercise your right to object, you will be requested to give the reasons why we should not process your personal data in the manner we intend. In the event of your justified objection, we will review the facts and either cease to process your data, or adjust data processing, or demonstrate to you our compelling legitimate grounds for continuing to process your data.

To exercise your rights, you can contact either the responsible party (see above) or the Data Protection Officer (see above).

### **Section 5 Recipients of the personal data**

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