Privacy Notice for Business Contacts (Art. 13/14 GDPR)

Information for contact persons whose data we process in our CRM.

1. Controller

esc Aerospace GmbH
Willy-Messerschmitt-Straße 1
82024 Taufkirchen
Germany

Email: sales@esc-aerospace.de
Phone: +49 89 550 5610 0

Register court: Amtsgericht München (Local Court of Munich) · Register number: HRB 204464

Data protection officer: No data protection officer has been appointed. Please address your concerns to the contact details above.

2. What data we process

Business contact data: academic degree (title), education (where shared in a professional context), first and last name, position/function, business email address and phone number, the company you belong to, notes on business communication and on joint matters, and freely assigned classifications (tags). In addition, your role in joint matters (for example sales opportunities, quotations, activities and tasks) together with the correspondence and documents filed for them, the source of the data, the legal basis and, if given, your consent to promotional contact with its date.

Our system also keeps a change log. It records when which action concerning your contact took place — for example created, changed, exported or moved to the trash — and, where recorded, the name of your contact entry at that time. Your name may also appear in entries on other matters, for example as the contact person of a sales opportunity.

3. Source of the data and provision

The data come from direct business contact — business cards, trade fairs, approaches initiated by you — and from publicly accessible professional sources.

You are not legally or contractually obliged to provide your data to us. Without your business contact details, however, we cannot stay in contact with you or prepare or perform a contract.

4. Purposes and legal bases

- **Relationship management and sales organisation (B2B) without promotional contact,** including the organisation of our work, for example passing on tasks (part 5): legitimate interest (Art. 6(1)(f) GDPR); our interest lies in organising our sales and maintaining our customer and partner relationships.
- **Purchasing and supplier management,** if you are the contact person of a supplier: legitimate interest (Art. 6(1)(f) GDPR); our interest is to organise our procurement and to maintain our supplier relationships.
- **Keeping our shareholders informed:** one shareholder has read access to our system (part 5); legitimate interest (Art. 6(1)(f) GDPR), our interest is to keep our shareholders informed about the development of our business.
- **Traceability of changes and proof of deletions** (change log, part 2): legitimate interest (Art. 6(1)(f) GDPR); our interest is to clarify changes and to prove that deletions were carried out properly.
- **Preparation/performance of contracts:** Art. 6(1)(b) GDPR, insofar as you are yourself a party to the contract or pre-contractual steps are taken at your request. If you act as the contact person of a

company, we process the data required for this on the basis of Art. 6(1)(f) GDPR; our interest is to prepare and perform the business relationship with that company.

- **Compliance with statutory retention obligations** (Section 257 of the German Commercial Code (HGB), Section 147 of the German Fiscal Code (AO)): legal obligation (Art. 6(1)(c) GDPR).
- **Promotional contact (marketing):** only with your consent (Art. 6(1)(a) GDPR), which you can withdraw at any time.

There is no automated decision-making, including profiling (Art. 22 GDPR).

5. Recipients

Access to our system is granted to authorised employees from sales and administration.

In addition, we pass on or internally process data as follows:

- **One of our company's shareholders,** who is not employed by us, with read-only access to our system, to keep that shareholder informed in that capacity (part 4).
- **Our employees without access to the system.** We can pass on a task from our system to them as text, for example by email or via Microsoft Teams. The text may contain your name, your company and notes on the matter. We do not pass on tasks to persons outside our company.
- **Our email provider** as a processor under Art. 28 GDPR, when a task is passed on by email. Under the contract, processing takes place in the EU/EEA; the provider transfers data to a third country only where this is necessary for its service, and only under the conditions of Art. 44 et seq. GDPR.
- **Microsoft** as a processor under Art. 28 GDPR, when a task is passed on via Microsoft Teams; Microsoft's data protection terms for its online services apply (Products and Services Data Protection Addendum).
- **Our hosting provider** as a processor under Art. 28 GDPR. The server is located in Germany; a data processing agreement is in place.
- **Our internal ERP (enterprise resource planning) system.** Name, position and business contact details are sent there with our master data but are not stored there. Stored there are details of companies and, where a transaction is handled there, of orders; if you are entered as esc's project manager for a funded project, your name is part of this.

Third countries: From our system itself we do not transfer any data to countries outside the EU/EEA. A transfer to a third country is possible, however, if we pass on a task via Microsoft Teams or if our email provider transfers data to a third country when processing a task passed on by email (see above). Transfers by Microsoft to the USA are covered by the European Commission's adequacy decision on the EU-US Data Privacy Framework (Implementing Decision (EU) 2023/1795 of 10 July 2023), under which Microsoft Corporation is certified.

6. Storage period

We store your data for as long as this is necessary for the business relationship and then delete or anonymise it. We review contacts without a connection to any matter that have had no activity for three years and anonymise them where we no longer need them. This does not apply to documents we are required by law to retain — in particular quotations and comparable commercial letters, for which Section 257 HGB and Section 147 AO provide for a retention period of six years; the period begins at the end of the calendar year in which the commercial letter was received or sent, and statutory extensions remain unaffected. While such a period is running, we restrict processing instead of deleting (Art. 17(3)(b), Art. 18 GDPR).

Log-ins to our system are logged for security reasons and automatically deleted after 90 days.

We automatically delete entries in the change log (part 2) after two years. Exempt are the records of the final deletion of your data and of a deletion refused because of a retention obligation — both contain

your name — as well as the record of an anonymisation, which does not contain your name. We keep these records without a deletion period so that we can prove that and how we carried out deletions and anonymisations or refused them because of a retention obligation (Art. 5(2) GDPR). An anonymisation overwrites your name in the record of a refused deletion.

What takes longer when data are deleted: Final deletion removes your contact record from the live system immediately; entries removed after a period has expired disappear from it just as immediately. Exempt are details stored elsewhere that mention you: your name in entries of the change log — until the two years have expired, and without a deletion period in the two records above — and mentions of you in notes and texts of other matters. Data in our system's trash remain stored until we delete them finally. In backup copies the data remain **until the end of the retention period** — this can be **up to 24 months** — and are not removed early there; they are used exclusively in case of a restoration. And insofar as data were transferred to our internal ERP system: it does not store your contact details (name, position, business contact details), except your name if you are entered as esc's project manager for a funded project. This name and details about you in a company's data remain stored there **for an indefinite period**; a company is **deactivated there and not deleted**, no period is provided for this, and details once handed over are **not retrieved** from there.

What is said about backup copies and the ERP system applies equally to all periods mentioned above.

7. Your rights

You have the right of **access** (Art. 15 GDPR), **rectification** (Art. 16), **erasure** (Art. 17), **restriction of processing** (Art. 18), **data portability** (Art. 20) and **objection** (Art. 21, part 8). You can **withdraw** consent you have given at any time, in particular via the contact details below. The lawfulness of processing based on consent before its withdrawal remains unaffected.

Contact for exercising your rights:
esc Aerospace GmbH, Willy-Messerschmitt-Straße 1, 82024 Taufkirchen, Germany
Email: sales@esc-aerospace.de

You also have the **right to lodge a complaint with a supervisory authority**. The authority responsible for us is the

> **Bayerisches Landesamt für Datenschutzaufsicht (BayLDA)** (Bavarian Data Protection Authority)
> Promenade 18, 91522 Ansbach
> https://www.lda.bayern.de

8. Your right to object

Objection on grounds relating to your particular situation (Art. 21(1) GDPR): Where we process your data on the basis of a legitimate interest (Art. 6(1)(f) GDPR), you can object to this at any time on grounds relating to your particular situation. We will then no longer process your data unless we can demonstrate compelling legitimate grounds that override your interests, rights and freedoms, or the processing serves the establishment, exercise or defence of legal claims.

Objection to direct marketing (Art. 21(2) GDPR): You can object at any time to the processing of your data for direct marketing purposes; your data will then no longer be used for this.

This notice is available in German and English.

Last updated: 17 November 2026