

## **Data Privacy Policy**

This is the data privacy policy of Novum Structures

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Personal data in accordance with Art 4 No. 1 General Data Protection Regulation (GDPR) are all information, which refer to an individual who can be identified directly or indirectly. This includes for example your name, your contact details and the data which you provide when registering a customer account, for processing your order or as part of a job application.

The following privacy policy is intended to inform you in particular about the type, scope, purpose, duration, and legal basis for the processing of such data according to Art. 13 GDPR either under our own control or in conjunction with others.

Our services are not addressed to young people under the age of 18.

### **Order processing**

The data you submit when ordering goods and/or services from us or selling materials to us will have to be processed in order to fulfill your order. Please note that orders cannot be processed without providing this data.

The legal basis for this processing is Art. 6 Para. 1 lit. b) GDPR.

After your order has been completed, your personal data will be deleted, but only after the retention periods required by tax and commercial law.

In order to process your order, we will share your data with the shipping company responsible for delivery to the extent required to deliver your order and/or with the payment service provider to the extent required to process your payment.

The legal basis for the transfer of this data is Art. 6 Para. 1 lit. b) GDPR.

### **Transmission of Data**

In principle personal data is transmitted to a third party only if:

- the data subject has given their express consent for this in accordance with Art. 6 Para 1 lit a) GDPR,
- transmission in accordance with Art. 6 Para 1 lit f) GDPR is necessary for the assertion, exercising or defence of legal claims and there are no reasons to assume that the data subject has an overwhelming interest worthy of protection in the non-transmission of your data,
- there is a statutory obligation to transmit the data in accordance with Art. 6 Para 1 lit c) GDPR, and/or

- this is necessary in accordance with Art. 6 Para 1 lit b) GDPR to satisfy a contractual relationship with the data subject.

Your personal data may be transferred / disclosed to other companies within the Novum group within the scope of a group-internal, collaborative process. Legal basis: Art. 6 Para 1 lit f) GDPR.

External service providers who process data on our behalf are carefully selected by us and are strictly contractually bound. The service providers work according to our instructions, which is ensured by strict contractual regulations, technical and organizational measures and additional controls.

A transfer to third countries outside the EU/EEA or to an international organization does not take place unless there are appropriate guarantees. These include the EU Standard Contractual Clauses. ([https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_de](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_de))

# NOVUM

## Privacy Policy

Our website may be used without entering personal information. However, different rules may apply to certain services on our site where we collect personal information from you (e.g., name, address, email address, telephone number, etc.). Information is considered personal if it can be associated exclusively to a specific natural person. The provisions below serve to provide information as to the manner, extent and purpose for collecting, using and processing personal information by the provider. Please be aware that data transfer via the internet is subject to security risks and, therefore, complete protection against third-party access to transferred data cannot be ensured.

Our services are not addressed to young people under the age of 18.

## Server Data

For technical reasons, your internet browser transmits to us or to our web provider (server log files), data such as – type and version of the browser you use – operating system – websites that linked you to our site (referrer URL) – pages that you visit – date and time of your visit – your Internet Protocol (IP) address. This data is collected and stored separately from any personal information you may have provided, making it impossible to connect it to any particular person. The data is used for statistical purposes to improve our website and services.

The basis for this storage is Art. 6 Para. 1 lit. f) GDPR. Our legitimate interest lies in the improvement, stability, functionality and security of our website.

We reserve the right to save the IP addresses of visitors to our websites for a period of 30 days. This recording of the data is for the purpose of identifying long-term attacks, limiting and overcoming disruptions as well as system and data security. If a continued storage is required for evidentiary purposes, all or part of the data will be excluded from deletion until the investigation of the relevant incident is finally resolved. Otherwise, the data will be made anonymous after this period, saved and processed for a further 900 days to compile statistics.

## Cookies / Web beacons

Our website makes use of cookies to recognize repeat use of our website by the same user/internet connection subscriber. Cookies are small text files that your internet browser downloads and stores on your computer. These cookies process certain specific information about you, such as your browser, location data, or IP address. They are used to improve our website services and to expedite your access. In most cases these “session cookies” are deleted once you leave our website. You can prevent cookies from being installed by adjusting the settings on your browser software accordingly. You should be aware, however, that by doing so you may not be able to make full use of all the functions of our website.

The legal basis for such processing is Art. 6 Para. 1 lit. b) GDPR, insofar as these cookies are used to collect data to initiate or process contractual relationships.

If the processing does not serve to initiate or process a contract, our legitimate interest lies in improving the functionality of our website. The legal basis is then Art. 6 Para. 1 lit. f) GDPR.

## **Contacting Us**

### **By E-Mail or Contact Form**

On our website we offer you the opportunity to contact us, either by email and/or by using a contact form. In such event, information provided by the user is stored for the purpose of facilitating communications with the user. No data is transferred or sold to third parties. Nor is any of this information matched to any information that may be collected by other components of our website.

The following information has to be given in the contact form:

#### **Name, Surname, Email, Subject, Project Description**

The legal basis for this data processing is consent which has been granted voluntarily in accordance with Art. 6 Para. 1 lit. a) GDPR.

The legal basis for this data processing is Art. 6 Para. 1 lit. b) GDPR, if the contact seeks to conclude a contract.

The form entries are retained for 50 days. After that your data will be deleted once we have fully answered your inquiry and there is no further legal obligation to store your data, such as if an order or contract resulted therefrom.

There is an unsubscribe option on all E-Mails we are sending to enable you to revoke your prior consent with future effect according to Art. 7 Para. 3 GDPR.

### **By Phone – Call Recording**

Your call may be recorded for training and monitoring purposes and personal data may be collected in order to resolve your enquiry.

The legal basis for this data processing is consent which has been granted voluntarily in accordance with Art. 6 Para. 1 lit. a) GDPR.

The legal basis for this data processing is Art. 6 Para. 1 lit. b) GDPR, if the contact seeks to conclude a contract.

### **Newsletter**

Our website offers you the opportunity to subscribe to a newsletter. To receive the newsletter, we require a valid email address. We may review the email address you provide for the purpose of determining whether you are in fact the owner of the email address provided. The data collected is used solely for the purpose of receiving a newsletter. This information if not matched with other components that our website may collect.

The legal basis for this is Art. 6 Para. 1 lit. a) GDPR.

You may revoke your prior consent to receive this newsletter under Art. 7 Para. 3 GDPR with future effect. All you have to do is inform us that you are revoking your consent or click on the unsubscribe link contained in each newsletter.

## **Social Networks**

Logos of social networks are displayed on our websites in the form of push buttons with the corresponding logos of the operators.

These are

- LinkedIn, operated by LinkedIn Corporation, 2029 Stierlin Court, Mount View, CA 94043, USA.
- Twitter, operated by Twitter, Inc., 1355 Market St, Suite 900, San Francisco, CA 94103, USA.
- Facebook, operated by Facebook Inc., 1601 S California Ave, Palo Alto, CA 94304 USA.
- Youtube operated by YouTube LLC, 901 Cherry Ave., San Bruno, CA94066 USA.
- Instagram operated by Instagram, 181 South Part Street, Suite 2, San Francisco, CA 94107, USA.

The push buttons are set up as hyperlinks to the relevant sites. There will be no transmission of data via pure linking. Transmission of data to the above-mentioned offices will take place only after the express activation of the corresponding push button.

Our legitimate interest lies in improving the functionality of our website. The legal basis is Art. 6 Para. 1 lit. f) GDPR.

Any personal information that you provide on any Novum Structures social media feature will typically be shared with other users of that social media feature (unless otherwise stated at the point of collection), over whom we often have limited or no control. Such interactions are governed by the privacy policies of the companies that provide the application.

Processing takes place on the basis of consent which has been granted voluntarily in accordance with Art. 6 Para. 1 lit. a) GDPR.

## **External Links**

The website contains so-called “external links” to other websites, over whose content the website provider has no influence. For this reason, the provider cannot assume any warranty for their content.

The relevant provider of the linked website is responsible for the content and accuracy of the information provided. No legal breaches were identifiable at the time the link was created. The link will be removed immediately if such a breach of law becomes known.

Our legitimate interest lies in improving the functionality of our website. The legal basis is Art. 6 Para. 1 lit. f) GDPR.

Processing takes place on the basis of consent which has been granted voluntarily in accordance with Art. 6 Para. 1 lit. a) GDPR.

## **Google Analytics**

We use Google Analytics on our website, a web analysis service of Google Inc. (“Google”). Google Analytics uses cookies that allow an analysis to be made on the usage of our websites. The information generated by the cookie on the use of our websites is, as a rule, transferred to a server of Google in the USA, where it is stored. However, as we use Google Analytics with the extension “anonymizeIP()”, Google will reduce the IP address of the website visitor within Member States of the European Union or in other states party to the Agreement on the European Economic Area before-hand, which excludes any direct association to you. Only in exceptional cases, is the full IP address transferred to a server of Google in the USA and shortened there. On behalf of Novum, Google will use this information in order to evaluate the use of the website, to prepare reports on the website activities and analyse marketing tools. The IP address transferred from the user’s browser with regard to Google Analytics is not merged with other data by Google. Further information on terms of use and data protection can be found under:

<https://policies.google.com/terms>

<https://policies.google.com/privacy>

This data processing is necessary for the purpose of our legitimate interest to carry out analyses in order to improve our website and our products (Legal basis: Art. 6 Para. 1 lit. f) GDPR).

### Google Analytics Opt-out:

You can prevent the processing of your usage data (including your IP address) by Google Analytics generally, by downloading and installing the browser add-on available at the following link:

<https://tools.google.com/dlpage/gaoptout>

In this case a persistent opt-out cookie (name: “ga-disable-UA-[...]”) is set in your current used browser, that prevents your data from being recorded in the future when you visit our websites with this specific browser. If you use another browser, Google Analytics will be in principle enabled, unless the opt-out cookie is also set in this browser. Please note, that Google Analytics will be enabled again, if you delete the abovementioned opt-out cookie in your browser.

## **Location-based tools**

Novum Structures will collect and use the geographical location of your computer or mobile device using a third-party plugin, GeotargetingWP (<https://geotargetingwp.com/>).

This location data is collected for the purpose of providing you with information regarding services being of interest to you based on your geographic location and redirect you to the Novum website of your location.

Our legitimate interest lies in improving the functionality of our website. The legal basis is Art. 6 Para. 1 lit. f) GDPR.

## **Publication of Vacancy Announcements / Job Applications**

We electronically collect and process your application data for the purpose of completing the application process.

The legal basis for this processing is Art. 6 Para. 1 lit. b) GDPR and §26 Para. 1 No. 1 BDSG in conjunction with Art. 88 Para. 1 GDPR.

If your application results in the conclusion of an employment contract, the data collected from you may be stored in your personnel file for purposes of normal organizational and administrative processes in compliance with appropriate legal requirements.

The legal basis for this processing is Art. 6 Para. 1 lit. b) GDPR §26 Para. 1 No. 1 BDSG in conjunction with Art. 88 Para. 1 GDPR.

Upon rejection of your application, data you have provided is deleted within two months. This does not apply in such instances where, due to legal requirements (such as any burden of proof obligations stipulated by law) a longer storage period is necessitated.

In this case, the legal basis is Art. 6 Para. 1 lit. f) GDPR and §24 Para. 1 No. 2 BDSG. Our legitimate interest lies in any legal defense we may have to mount.

If you expressly consent to a longer storage of your data, e.g., for your inclusion in a database of applicants or interested parties, the data will be processed further on the basis of your consent. The legal basis is then Art. 6 Para. 1 lit. a) GDPR. You may withdraw your consent at any time per Art. 7 Para. 3 GDPR with future effect.

## **The rights of users and data subjects**

With regard to the data processing users and data subjects have the right

- to receive confirmation of whether data concerning them is being processed, information about the data being processed, further information about the nature of the data processing, and copies of the data (Art. 15 GDPR);
- to correct or complete incorrect or incomplete data (Art. 16 GDPR);
- to the immediate deletion of data concerning them (Art. 17 GDPR), or, alternatively, if further processing is necessary as stipulated in Art. 17 Para. 3 GDPR, to restrict said processing per Art. 18 GDPR;
- to receive copies of the data concerning them and/or provided by them and to have the same transmitted to other providers/controllers (Art. 20 GDPR);
- to file complaints with the supervisory authority if they believe that data concerning them is being processed by the controller in breach of data protection provisions (Art. 77 GDPR).
- Likewise, under Art. 21 GDPR, users and data subjects have the right to object to the controller's future processing of their data pursuant to Art. 6 Para. 1 lit. f) GDPR. In particular, an objection to data processing for the purpose of direct advertising is permissible.

Please contact [datacompliance@novumstructures.co.uk](mailto:datacompliance@novumstructures.co.uk) or call +44 (0)1379 640040 to discuss the above.

## **Complaints Process**

When we process your personal information, we will comply with the Data Protection Legislation/Regulations.

If you believe we have not complied with your rights as a data subject, or our obligations, and you are unhappy with the way Novum Structures processes your personal information or you have any questions about this Privacy Notice, please contact us [datacompliance@novumstructures.co.uk](mailto:datacompliance@novumstructures.co.uk)

For independent advice about data protection matters you have the right to escalate any complaint at any time to the Information Commissioner's Office (the UK supervisory authority for Data Protection issues) please see below for their postal address, contact telephone number and website link:

Information Commissioner's Office  
Wycliffe House  
Water Lane, Wilmslow  
Cheshire  
SK9 5AF

Telephone helpline number: 0303 123 1113  
<https://ico.org.uk/>

This privacy policy was last updated on 9 August 2022.