

1. Obligations for information pursuant Art. 13 GDPR

When personal data are collected for the first time, extensive obligations for information result from Art. 13 GDPR (Information to be provided where personal data are collected from the data subject) and Art. 14 GDPR (Information to be provided where personal data have not been obtained from the data subject).

The following model serves to fulfill the obligations for information pursuant to Art. 13 GDPR using the example of information obligations in the context of "simple" contract initiation/processing.

Depending on the purpose of the processing, there may be an obligation to provide further information. This applies, among other things, to the processing of sensitive data (Art. 9 GDPR "Special categories of personal data"), the application of creditworthiness checks (extended information pursuant to Art. 13 para. 2 f) GDPR "Automated Decision in individual cases, profiling"), the use of customer and user profiles or if, for example, data transfer to non-EU countries is intended (Art. 44 ff GDPR "General Principle for Transfers").

Should you intend to process the data for several processing purposes, e.g. in addition to contract processing also for marketing purposes, each individual processing purpose must be set out and justified in accordance with section 2 (a) - (d).

When providing information in the context of Art. 14 GDPR, i.e. when processing data that has been collected by/via third parties, there are further obligations to provide information, including information on the origin of the data (source).

The following model for fulfilling the information obligations pursuant to Art. 13 GDPR does not constitute advice under civil law. This model serves as an orientation guide with regard to the information obligations resulting from Art. 13 GDPR. Due to the changing scope of the information obligations depending on the processing and purpose of the processing, it is necessary to examine the extent to which the obligations for information still have to be changed and supplemented in the individual case before using them!

2. How we handle your data and your rights

2.1 Who is responsible for the data processing?

The party responsible pursuant to the General Data Protection Regulation (GDPR) is:

AQUAERO Holding GmbH
Robert-Bosch-Straße 15
72186 Empfingen
Phone: +49 7485 97722-100
Email: info@sacs.aero

The AQUAERO Holding GmbH is responsible on behalf of the group companies for the data processing and therefore has been authorized to represent the following group companies.

Parent company:

AQUAERO Holding GmbH
Robert-Bosch-Straße 15
72186 Empfingen

Sister companies:

SACS Aerospace GmbH
Robert-Bosch-Straße 15
72186 Empfingen

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XBAG GmbH
Robert-Bosch-Straße 15
72186 Empfingen

SACS Verwaltungs GmbH
Robert-Bosch-Straße 15
72186 Empfingen

SACS Services GmbH
Robert-Bosch-Straße 15
72186 Empfingen

AEROCHEM GmbH
Robert-Bosch-Straße 15
72186 Empfingen

You will find further information about our company, any details about the persons authorized to represent and also further contact options in the imprint of our website: <https://www.sacs.aero>

Contact details of the Data Protection Officer:
Steffen Wacker
dataprotection@sacs.aero

2.2 Which data of you are processed? And for which purposes?

If we collect data of you, we will process it basically only for the purposes for which we have received and collected it.

The processing for other purposes can only be considered if the necessary legal requirements pursuant Art. 6 para. 4 GDPR have been met. Any information obligations pursuant to Art. 13 para. 3 GDPR and Art. 14 para. 4 GDPR will be observed in this case as a matter of course.

2.3 On which legal basis is the data processing based?

The legal basis for the processing of personal data is basically – in so far as specific legislation does not yet exist – Art. 6 GDPR “Lawfulness of processing”. Here the following possibilities come into consideration:

- Consent (Art. 6 para. 1 lit. a) GDPR)
- Processing for the performance of a contract (Art. 6 para. 1 lit. b) GDPR)
- Processing for the purposes of the legitimate interests (Art. 6 para. 1 lit. f) GDPR)
- Processing is necessary for compliance with a legal obligation (Art. 6 para. 1 lit. c) GDPR)

If personal data is processed on the basis of a consent, you have the right to withdraw your consent at any time with effect for the future.

If we process the data for the purposes of the legitimate interests, taking into account the requirements of Art. 21 GDPR for the processing of personal data, you have the right to object.

2.4 How long is the data stored?

We process the data as long as it is required for the particular purpose.

Insofar as statutory retention periods exist – e.g. in commercial law and tax law – the personal data concerned is stored for the period of the retention obligation. After expiration of this retention obligation it is examined whether a further requirement for the processing exists. If there is no further requirement, the data will be deleted.

As a matter of principle, towards the end of a calendar year we carry out an examination of data with regard to the need for further processing. Due to the amount of data this examination is carried out with regard to specific types of data or purposes of processing.

General collection of data



Of course, you can always (see below) request information about the personal data we have about you and in the event of a non-existent requirement, you can demand a deletion of the data or a restriction.

2.5 To which recipients is the data passed on?

As a matter of principle a passing on to third parties of your personal data only takes place if this is necessary for the performance of a contract, if this is permissible for the purposes of the legitimate interests pursuant to Art. 6 para. 1. Lit. f) GDPR, if we are legally obliged to pass it on or as far as you have given us a consent.

2.6 Where is the data processed?

Your personal data is exclusively processed in data processing service centres in the Federal Republic of Germany.

2.7 Your right as person concerned

You have the right to information about the personal data of you processed by us.

For a request for information which is not in written form, we ask for understanding that we may then require proof of you, which show that you are the person who you claim to be.

Furthermore you have the right to deletion or restriction of the processing of your stored data to extent that you are legally entitled to do so.

Furthermore you have a right of objection to the processing within the legal framework. As well as a right to data transfer within the framework of the legal data protection regulations.

You particularly have a right to object pursuant to Art. 21 para. 1 and 2 GDPR the processing of your data for purposes of direct mail advertising if this is for the purposes of the legitimate interests.

2.8 Where to complain?

You have the option to address your complaint to the Data Protection Officer or the Data Protection Authority. The Data Protection Authority responsible is:

Der Landesbeauftragte für den Datenschutz und die Informationsfreiheit Baden-Württemberg
Postfach 10 29 32, 70025 Stuttgart
Königstraße 10a, 70173 Stuttgart
Phone: 0711/61 55 41 – 0 Fax: 0711/61 55 41 – 15
Email: poststelle@lfdi.bwl.de
Internet: <https://www.baden-wuerttemberg.datenschutz.de>