

Website and Cookie Data Privacy Notice

Group Corporate Policy
GCP-LCD-004 v 02

Legal and Compliance Department
Internal



sealing the future.



Document control

Title:	Website and Cookie Data Privacy Notice		
Document ID:	GCP-LCD-004 v 02	Repository:	MS OneDrive
Scope:	Entire group	Classification:	Internal
Version number:	02	Version date:	30 April 2025
Valid from:	25 May 2018	Review:	Every three years
Superseded version:	GCP-LCD-004 v 01		

Changes to the superseded version:

- *General regular review, update and alignment with usual practice and latest regulation*

Responsible:	Legal and Compliance Department	Approved by:	Executive Committee
Function:	Director Legal & Compliance		
Name:	Tomas Krestianko	Date of approval:	24 May 2018
Date:	30 April 2025		

Signature:



Contents

1. Overview	4
2. Scope	4
3. Website and Cookie Data Privacy Notice	5
3.1. Website Data Privacy Notice	5
What does SaarGummi do?	5
What personal information does SaarGummi collect and why?	5
Who does SaarGummi share my personal information with?	6
Legal basis for processing personal information	7
Cookies and similar tracking technology	7
How does SaarGummi keep my personal information secure?	8
International data transfers	8
Data retention	8
Your data protection rights	8
Updates to this Privacy Notice	9
How to contact us	9
3.2. Cookie Data Privacy Notice	9
What are cookies?	9
Why do we use cookies?	10
How about other tracking technologies?	11
Do you serve targeted advertising?	11
How can I control cookies?	11
How often will you update this Cookie Data Privacy Notice?	12
Where can I get further information?	12
Appendix 1: Cookie Banner	13



1. Overview

In the European Union (EU), Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR) is the directly applicable law. Accordingly, all companies which are established or active in the EU or the European Economic Area (EEA) must observe the GDPR and fulfil the requirements set out therein. National data protection laws also apply – along with the GDPR as applicable – in all countries within and outside of the EU and the EEA in which SaarGummi (as defined below) is active. All SaarGummi group companies must ensure that they are familiar with the applicable data protection provisions and comply with them.

As the EU has been the pioneer in establishing comprehensive data protection requirements, SaarGummi's aspiration is to ensure that personal data across its group companies are treated within the high standards dictated by the GDPR.

The purpose of this Group Corporate Policy Website and Cookie Data Privacy Notice (hereinafter the "Policy") is to ensure that SaarGummi informs the users of its websites of the processing of their personal data by SaarGummi in accordance with applicable data protection law (under the GDPR, Articles 13 and 14) and as uniformly as possible.

The Policy shall be read in conjunction with other Group Corporate Policies and local procedure in place. Should it conflict with local law, including case law and official statements, the latter will prevail.

2. Scope

This Policy is approved and adopted by the Executive Committee of CQLT SaarGummi Technologies S.à r.l. It applies for CQLT SaarGummi Technologies S.à r.l., and the group companies where CQLT SaarGummi Technologies S.à r.l. has a direct or indirect shareholding of more than 50%, more than 50% of the voting rights or otherwise controls the business activities ("**SaarGummi**").

The following Website and Cookie Data Privacy Notice ("**Notice**") describes how CQLT SaarGummi Technologies S.à r.l. may process the personal data of users of its websites. Insofar as SaarGummi group companies operate websites on their own responsibility, they must ensure that they provide the users of their websites with a corresponding Website and Cookie Data Privacy Notice. The following Notice as well as the draft cookie banner in Appendix 1 are intended to serve as a basis for this, which must be adapted to local circumstances and local law as necessary before it is used by the SaarGummi group companies in particular the parts highlighted in yellow.



3. Website and Cookie Data Privacy Notice

3.1. Website Data Privacy Notice

SaarGummi Slovakia s.r.o. ("**SaarGummi**", "**we**" or "**us**") respects your right to privacy. This Privacy Notice explains who we are, how we collect, share and use personal information about you, and how you can exercise your privacy rights. This Privacy Notice only applies to personal information that we collect through our website at <https://www.saargummi.sk/> ("**Website**").

If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Privacy Notice.

We recommend that you read this Privacy Notice in full to ensure you are fully informed. However, if you only want to access a particular section of this Privacy Notice, then you can click on the relevant link below to jump to that section.

- What does SaarGummi do?
- What personal information does SaarGummi collect and why?
- Who does SaarGummi share my personal information with?
- Legal basis for processing personal information
- Cookies and similar tracking technology
- How does SaarGummi keep my personal information secure?
- International data transfers
- Your data protection rights
- Updates to this Privacy Notice
- How to contact us

What does SaarGummi do?

SaarGummi is a developer and manufacturer of sealing systems for the automotive and construction industries headquartered in Luxembourg but with group companies all around the world.

What personal information does SaarGummi collect and why?

The personal information that we may collect about you broadly falls into the following categories:

- Information that you provide voluntarily

Certain parts of our Website may ask you to provide personal information voluntarily: for example, we may ask you to provide your contact details i.e. your name, e-mail address and telephone number in order to register an account with us, to subscribe to marketing communications from us, and/or to submit enquiries to us. The personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your personal information.

- Information that we collect automatically

When you visit our Website, we may collect certain information automatically from your device. In



some countries, including countries in the European Economic Area (EEA), this information may be considered personal information under applicable data protection laws.

Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our Website, including the pages accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our Website, where they come from, and what content on our Website is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our Website to our visitors.

Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading “Cookies and similar tracking technology” link below.

- Information that we obtain from third party sources

From time to time, we may receive personal information about you from third party sources (including marketing list providers), but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

The types of information we collect from third parties include your email address and we use the information we receive from these third parties to maintain and improve the accuracy of the records we hold about you.

In general, we will use the personal information we collect from you only for the purposes described in this Privacy Notice or for purposes that we explain to you at the time we collect your personal information. However, we may also use your personal information for other purposes that are not incompatible with the purposes we have disclosed to you (such as archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes) if and where this is permitted by applicable data protection laws.

Who does SaarGummi share my personal information with?

We may disclose your personal information to the following categories of recipients:

- to our **group companies, third party services providers and partners** who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our Website), or who otherwise process personal information for purposes that are described in this Privacy Notice or notified to you when we collect your personal information. A list of our current group companies is available at <https://www.saargummi.sk/>
- to any **competent law enforcement body, regulatory, government agency, court or other third party** where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- to an **actual or potential buyer** (and its agents and advisers) in connection with any actual



or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice;

- to any **other person with your consent** to the disclosure.

Legal basis for processing personal information

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only (i) where we need the personal information to perform a contract with you (under Regulation (EU) 2016/679 – GDPR: Article 6(1)b)), (ii) where the processing is in our legitimate interests and not overridden by your rights (under the GDPR: Article 6(1)f)), or (iii) where we have your consent to do so (under the GDPR: Article 6(1)a)). In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person (under the GDPR: Article 6(1)c)).

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

If we collect and use your personal information in reliance on our legitimate interests (or those of any third party), this interest will normally be to operate our platform and communicating with you as necessary to provide our services to you and for our legitimate commercial interest, for instance, when responding to your queries, improving our platform, undertaking marketing, or for the purposes of detecting or preventing illegal activities. We may have other legitimate interests and if appropriate we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the “How to contact us” heading below.

Cookies and similar tracking technology

We use cookies in order to make visits to the Website more attractive and enable certain functions to be used. So-called 'cookies' are small text files which your browser can download on your computer. This process of downloading a cookie file is also referred to as 'placing a cookie'. You yourself can set your browser in accordance with your own wishes in such a way that you can be informed about the placing of cookies, decide whether to accept them or not on a case-to-case basis or decide whether to accept or reject them as a matter of basic principle. Cookies can be deployed for various purposes, for example in order to recognize that your PC has already been connected to a given website (persistent cookies) or in order to save sites recently viewed (session cookies). We may deploy cookies in order to offer you greater user convenience. In order to be able to avail yourself of these convenience functions, you are recommended to allow the acceptance of cookies for this Website. For further information about the types of Cookies we use, why, and how you can control Cookies, please see our Cookie Data Privacy Notice: https://group.saargummi.com/en/cookies?set_locale=1.



How does SaarGummi keep my personal information secure?

We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information.

Once all the technical and organisational options have been exercised, your personal information will be saved in such a way that they are not accessible to unauthorized third parties. In communication by e-mail, however, full data security cannot be guaranteed by the provider, for which reason despatch by post or courier is recommended for information that is highly confidential.

International data transfers

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country and, in some cases, may not be as protective.

Specifically, our Website servers are located in within the European Union, and our group companies and third party service providers and partners operate around the world. However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Notice. As we are based in the European Union, these include implementing the European Commission's Standard Contractual Clauses for transfers of personal information between our group companies, which require all group companies to protect personal information they process from the EEA in accordance with European Union data protection law. For further details on the appropriate safeguards, please contact us using the contact details provided below.

Data retention

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

Your data protection rights

If the legal requirements have been fulfilled, you have the following data protection rights:

- If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by contacting us using the contact details provided under the "How to contact us" heading below.
- In addition, you can **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the "How to contact us" heading below.



- You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the “How to contact us” heading below.
- Similarly, if we have collected and process your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.

You can see when this Privacy Notice was last updated by checking the “last updated” date displayed at the bottom of this Privacy Notice.

How to contact us

Please address any questions or requests relating to about our use of your personal information gdp@saargummi.com

The data controller of your personal information is SaarGummi Slovakia s.r.o.

Last updated: [25.6.2025]

3.2. Cookie Data Privacy Notice

This Cookie Data Privacy Notice explains how SaarGummi Slovakia s.r.o.. (“**SaarGummi**”, “**we**” or “**us**”) use cookies and similar technologies to recognise you when you visit our websites at <https://www.saargummi.sk/> (“**Websites**”). It explains what these technologies are and why we use them, as well as your rights to control our use of them.

What are cookies?

Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies are widely used by website owners in order to make their websites work, or to work more efficiently,



as well as to provide reporting information.

Cookies set by the website owner (in this case, SaarGummi) are called "first party cookies". Cookies set by parties other than the website owner are called "third party cookies". Third party cookies enable third party features or functionality to be provided on or through the website (e.g. like advertising, interactive content and analytics). The parties that set these third party cookies can recognise your computer both when it visits the website in question and also when it visits certain other websites.

Why do we use cookies?

We may use first party and third party cookies for several reasons. Some cookies are required for technical reasons in order for our Websites to operate, and we refer to these as "essential" or "strictly necessary" cookies. Other cookies may also enable us to track and target the interests of our users to enhance the experience on our Websites. Third parties such as Google Analytics serve cookies through our Websites for advertising, analytics and offer greater user convenience of our Website. This is described in more detail below.

The specific types of first and third party cookies and similar technologies served through our Websites and the purposes they perform are described in the table below:

Types of cookies	Name, provider, purpose and retention period of cookie	How to refuse
Essential cookies: These cookies are used to enable you to access and use our Website and other features or content on the Website that you wish to access or use. You can disable these Cookies, but this will make the operation of our Website more difficult and may make certain features and services of our website unavailable to you. The legal basis for processing personal data contained in such cookies (if any) is Article 6(1)(f) GDPR (legitimate interests).	WordPress	To refuse these cookies, please follow the instructions below under the heading "How can I control cookies?"
Performance and functionality cookies: These cookies are used to enhance the performance and functionality of our Websites but are non-essential to their use. However, without these cookies, certain functionality (like videos) may become unavailable. The legal basis for processing personal data contained in such cookies (if any) is Article 6(1)(a) GDPR (consent).	Wordfence	You may withdraw your consent at any time, whereby this will not affect the lawfulness of the processing that occurred prior to the withdrawal of your consent. To withdraw your consent, please access our cookie banner and set your preferences.



Analytics and customization cookies: These cookies collect information that is used either in aggregate form to help us understand how our Websites are being used or how effective are marketing campaigns are, or to help us customize our Websites for you. The legal basis for processing personal data contained in such cookies (if any) is Article 6(1)(a) GDPR (consent).	<i>Google Analytics</i>	To refuse these cookies, please follow the instructions below under the heading "How can I control cookies?"
Advertising cookies: These cookies are used to make advertising messages more relevant to you. They perform functions like preventing the same ad from continuously reappearing, ensuring that ads are properly displayed for advertisers, and in some cases selecting advertisements that are based on your interests. The legal basis for processing personal data contained in such cookies (if any) is Article 6(1)(a) GDPR (consent).	<i>Hubspot.</i>	To refuse these cookies, please follow the instructions below under the heading "How can I control cookies?"

How about other tracking technologies?

Cookies are not the only way to recognize or track visitors to a website. We may use other, similar technologies from time to time, like web beacons (sometimes called "tracking pixels" or "clear gifs"). These are tiny graphics files that contain a unique identifier that enable us to recognize when someone has visited our Websites. In many instances, these technologies are reliant on cookies to function properly, and so declining cookies will impair their functioning.

Do you serve targeted advertising?

Third parties may serve cookies on your computer or mobile device to serve advertising through our Websites. These companies may use information about your visits to this and other websites in order to provide relevant advertisements about goods and services that you may be interested in. They may also employ technology that is used to measure the effectiveness of advertisements. This can be accomplished by them using cookies or web beacons to collect information about your visits to this and other sites in order to provide relevant advertisements about goods and services of potential interest to you. The information collected through this process does not enable us or them to identify your name, contact details or other personally identifying details unless you choose to provide these.]

How can I control cookies?

You have the right to decide whether to accept or reject cookies. You can exercise your cookie preferences by clicking on the appropriate links provided in the cookie table above.

You yourself can set your browser in accordance with your own wishes in such a way that you can be informed about the placing of cookies, decide whether to accept them or not on a case-to-case basis or decide whether to accept or reject them as a matter of basic principle. Cookies can be deployed for various



purposes, for example in order to recognize that your PC has already been connected to a given website (persistent cookies) or in order to save sites recently viewed (session cookies). The provider deploys cookies in order to offer you greater user convenience. In order to be able to avail yourself of these convenience functions, you are recommended to allow the acceptance of cookies for this website.

If you would like to find out more information, please visit <http://www.aboutads.info/choices/> or <http://www.youronlinechoices.com>.

How often will you update this Cookie Data Privacy Notice?

We may update this Cookie Statement from time to time in order to reflect, for example, changes to the cookies we use or for other operational, legal or regulatory reasons. Please therefore re-visit this Cookie Data Privacy Notice regularly to stay informed about our use of cookies and related technologies.

The date at the bottom of this Cookie Data Privacy Notice indicates when it was last updated.

Where can I get further information?

If you have any questions about our use of cookies or other technologies, please email us at gdpr.skdv@saargummi.com.

Last updated: [25.6.2025]



Appendix 1: Cookie Banner

"This website uses cookies and similar technologies for analytics and functionality, and advertising purposes. By clicking ["Accept All"], you consent to us, [SaarGummi Slovakia s.r.o.], processing data such as your IP address and information about your behaviour on our website so as to analyse and optimise visits to our website. As described in our Website and Cookie Data Privacy Notice, you may withdraw your consent at any time with future effect. You can click ["Further information"] for further information on the cookies and similar technologies used. If you choose ["Deny"], only strictly necessary cookies will be used."

Instructions for implementing: It must be technically ensured that non-essential cookies and similar technologies are only used if the user clicks the ["Accept All"] button. Avoid nudging and deceptive measures when presenting the ["Accept All"], ["Deny"] and ["Further information"] button, i.e. use same colors, font size etc.

