

## PRIVACY POLICY

### For the Processing of Your Data within the Scope of the WAGO Solutions Platform and for Establishing Contact via Contact Forms

Version of 2023-10-31

#### I. Basic Information on Data Processing

**Thank you for your interest in the WAGO Solutions Platform. The protection of your personal data is very important to us. Therefore, we want to inform you comprehensively about the information we collect on our WAGO Solutions Platform, the purpose for which we use it, whom we may make it available to and what rights you have (Art. 12 and 13 of the General Data Protection Regulation – GDPR).**

Our privacy measures are guided by the General Data Protection Regulation (GDPR, Regulation (EU) 2016/679), effective May 25, 2018. Should personal data be processed in a particular instance, we want to provide a simple parenthetical citation of a provision to indicate which standard justifies the data processing.

Controller in the sense of protection law:

WAGO GmbH & Co. KG  
Hansastraße 27  
32423 Minden  
Phone: 0571/887-0  
Fax: 0571/887-169  
Email: [info@wago.com](mailto:info@wago.com)

We take the internal data protection very seriously in our company. We contractually obligate our employees and the processors (service companies) we engage to maintain confidentiality and to observe the IT/security rules and the applicable data protection provisions.

#### 1. Object of the Data Protection

The GDPR defines "personal data" as any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data or an online identifier.

Except as is clear from this document or other circumstances, we are not able to identify you.

## **2. Security**

Both we and our contractual partners protect your personal data against unauthorized access, loss, use or dissemination and ensure that your personal information is located in a legally required, monitored, secure environment that prevents unauthorized accesses, loss or dissemination.

Where data is processed on our behalf, we work only with processors who offer a sufficient guarantee that suitable technical and organizational measures have been taken to ensure that their data processing complies with Art. 28 GDPR and that your legal rights are fully protected.

If we jointly determine the purposes and means of processing with one or more contractual partners, we designate ourselves as joint controllers in accordance with Art. 26 GDPR. To this end, we jointly determine in an agreement which contractual partner must meet which obligation pursuant to the GDPR.

Technical and organizational measures have been taken in our company to ensure that our company observes the legal requirements of the GDPR and to protect your data against damage, destruction, distortion, manipulation and unauthorized access.

To avoid unnecessary amounts of data, we process and use your personal data only to the extent that this is required within the scope of our range of services.

## **3. Your Rights to Access, Rectification, Locking, Erasure, Completion, Restriction and Data Portability (Rights of Data Subjects)**

You can, without charge and without giving reasons, obtain access to information about whether your personal data is processed. Pursuant to Art. 15 GDPR, you have a right to access this personal data and to receive further information on the processing of the data of yours that we store.

As part of your legal rights under Art. 16 and 17 GDPR, you can have the data of yours which we store locked, rectified or erased.

Your personal data is erased if no legal retention requirements oppose this and you request erasure in writing or text form. Furthermore, you have the right to have incomplete data completed and to demand the restriction of processing in the cases regulated by law pursuant to Art. 18 GDPR if the personal data is incorrect.

You also have a right to data portability pursuant to Art. 20 GDPR if we have named Art. 6(1)(a) or (b) or Art. 9(2)(a) GDPR in this policy as a basis of the data processing. When exercising the right to data portability, you have the right to demand that the personal data be transmitted directly from the responsible party to another responsibility party if this is technically feasible.

Pursuant to Art. 7 (3) GDPR, you also have the right to withdraw, at any time, the consent you once gave us. If you invoke this right, we are no longer permitted to process the data based on such consent, with future effect.

## **II. Purpose, Legal Basis and Data Categories**

In general, visiting the start page of the WAGO Solutions Platform does not require you to provide personal data. However, the IP address transmitted from your system is required for technical reasons in order to transfer the data from our WAGO Solutions Platform to you. To use the WAGO Solutions Platform beyond the start page of the WAGO Solutions Platform, we may – for instance, as part of your registration – need your personal data (such as your form of address, first name and last name) in order to respond to you personally.

To process your data, we require a legal basis. Art. 6 GDPR presents a nonexclusive list of legal bases. Under Art. 6 GDPR, processing is permitted if:

- You have given consent to the processing of your personal data for one or more specific purposes (Art. 6(1)(a) GDPR);
- Processing is necessary for the performance of a contract to which the data subject is party. This also applies to steps at the request of the data subject prior to entering into a contract (Art. 6(1)(b) GDPR);
- Processing is necessary for compliance with a legal obligation to which we are subject (Art. 6(1)(c) GDPR);
- Processing is necessary for compliance with a legal obligation to which the controller is subject. This may include the rare event in which a data subject is severely injured and therefore the subject's personal data is shared with a physician, for instance (Art. 6(1)(d) GDPR);
- Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data (Art. 6(1)(f) GDPR). Processing procedures not covered by any of the above legal bases are premised on this legal basis if the processing is required in order to protect a legitimate interest of our company or a third party, except where the interests, fundamental rights and freedoms of the data subject override these interests. Such processing procedures are expressly permitted for us because they have been specifically mentioned by the European legislature. This legislation advocated the view that a legitimate interest may be assumed when the data subject is a client of the controller (Recital 47 sentence 2 GDPR).

## **III. Collection, Storage and Use of Usage Data When Visiting the WAGO Solutions Platform with Registration and after Login**

For your registration, it is essential for at least the following personal data (personal data in the sense of Art. 4(1) GDPR) to be processed: form of address, first name, last name, email address and password. We use the data you provide during the full registration to enable registration on the WAGO Solutions Platform (Art. 6(1)(a), (b) and (f) GDPR).

You also have the option of logging into the WAGO app, our mobile iPhone and Android app, through your existing WAGO Solutions Platform account. To do so, you need your email address that is registered with the WAGO Solutions Platform, as well as your password.

Once you have logged into the WAGO Solutions Platform with the app, you have the option of using the app to scan a generated QR code from the WAGO Solutions Platform and the device code of the controller that is to be commissioned. The app then displays the device information, as well as the status and the devices that have already been commissioned, in a list. After commissioning, the application is transferred from the WAGO Solutions Platform to the controller.

We will use the data you provide during login to enable registration on the WAGO Solutions Platform (Art. 6(1)(a), (b) and (f) GDPR).

Additional information on data protection for the WAGO app is available in the privacy policy of the WAGO app.

#### **IV. Collection and Storage of Usage Data When Visiting Our WAGO Solutions Platform without Registration, Use of Cookies**

When you visit our WAGO Solutions Platform, we receive your complete IP address from your computer. Only with this IP address are we able to transmit the data of our WAGO Solutions Platform to you in order for the WAGO Solutions Platform to be displayed for you (Art. 6 (1)(b) and (f) GDPR). Beyond the processing for transmission of the retrieved data, the full IP address is stored for only thirty (30) days to allow us to take defensive measures against attacks on our IT systems, such as blocking IP addresses, as well as for possible criminal prosecution (Art. 6(1)(f) GDPR).

We save the date and time of the page view and the page from which you retrieved our WAGO Solutions Platform. We also save changes to security-related settings, such as password changes, configuration setting changes, the addition of new users and changes to rights. We do not save other personal data unless you log in.

Insofar as the programming of our WAGO Solutions Platform prompts your browser to load data from servers operated by third parties, we are not involved in these data transmissions ourselves. Therefore, we would like to inform you about the cookies that are set on our WAGO Solutions Platform. Please note that these cookies are necessary in order to offer the WAGO Solutions Platform. Therefore, they cannot be unselected. The following cookies are required:

#### Session cookie (jwt)

Use of a session cookie to authenticate the user with the CMS system used on the WAGO Solutions Platform. Through use of the cookie, data related to the WAGO Solutions Platform is stored on the user's computer and transmitted to the server upon request. This allows the user to be identified and authenticated when visiting the WAGO Solutions Platform.

#### Next-i18n

This session storage is used to automatically set the language for the user on the WAGO Solutions Platform interface. The WAGO Solutions Platform is currently only available in German. As soon as the WAGO Solutions Platform is accessed, a "Session ID" is generated and transmitted to the client. This number is temporarily stored by the session storage (next-i18n) and is used only to associate the user of the WAGO Solutions Platform with a specific session.

#### CloudFlare

The WAGO Solutions Platform uses the CloudFlare service of Cloudflare, Inc., 101 Townsend St, 94107 San Francisco, USA (hereinafter referred to as "Cloudflare"). Cloudflare offers a globally distributed content delivery network with DNS. The information transfer between your browser and our WAGO Solutions Platform is routed through Cloudflare's network by technical means. This allows Cloudflare to analyze traffic between your browser and our website and serve as a filter between our servers and potentially malicious traffic from the Internet. For this purpose, Cloudflare sets this cookie in order to identify the visitors to our WAGO Solutions Platform and provide targeted blocking of unwanted visitors.

## **V. Duration of Storage**

We store your data for different lengths of time depending on the required purpose of processing.

If no express storage period is indicated upon collection (for instance, as part of a declaration of consent), personal data is erased when it is no longer required for fulfilling the purpose of storage, unless legal retention obligations (such as retention obligations under commercial and tax law) preclude erasure. We therefore normally process your data for the duration of the entire business relationship (from initiation and execution up to termination of a contract and until any possible interest in information you may have ends).

In addition, we store your data in compliance with and within the scope of legal retention and documentation obligations, with applicable guarantee, warranty and limitation periods and, in the event of legal disputes, until the end of such disputes in which this data is required as evidence.

## **VI. Withdrawal Rights**

**You can, at any time with future effect and without stating reasons, withdraw the consent you have given us to collect and use data without thereby affecting the lawfulness of the processing that occurred based on your consent until the withdrawal. After the withdrawal, WAGO may further process your personal data only if the processing is required on another legal basis or because of a statutory obligation. You can send your notice of withdrawal to controllers or to the contact address indicated in the site notice. Insofar as is technically possible, we will also make withdrawal options available to you in your account.**

## **VII. Data Protection Officer**

If you have further questions about the protection of your personal data, this Privacy Policy, declarations of consent and the processing of your personal data, or if you have complaints concerning data privacy, you can contact our Data Protection Officer:

WAGO GmbH & Co. KG  
-DATA PROTECTION-  
Hansastraße 27  
32423 Minden  
Email: [dataprotection@wago.com](mailto:dataprotection@wago.com)

Independent of the provisions of this Privacy Policy, Art. 13(2)(d) GDPR grants you a statutory right to lodge a complaint with the competent supervisory authority.

## **VIII. Acknowledgment of the Privacy Policy, Changes**

This Privacy Policy shall be in force from the time of publication on the WAGO Solutions Platform of WAGO GmbH & Co. KG until revocation.

Confirmation and acknowledgment of the Privacy Policy is essential in order to make use of our offerings.

Please bear in mind that data protection regulations and handling related to data protection can change at any time, requiring the content of this Privacy Policy to be adjusted. If occurs, we will describe the changes in a form transparent to you. In addition, it is advisable to stay informed of changes in the law and our company's practice.