

# PRIVACY POLICY

## 1. An overview of data protection

### General information

The following information will provide you with an easy to navigate overview of what will happen with your personal data when you visit our website. The term "personal data" comprises all data that can be used to personally identify you. For detailed information about the subject matter of data protection, please consult our Data Protection Declaration, which we have included beneath this copy.

### Data recording on our website

Who is the responsible party for the recording of data on this website (i.e. the "controller")?

The data on this website is processed by the operator of the website, whose contact information is available under section "Information Required by Law" on this website.

How do we record your data?

We collect your data as a result of your sharing of your data with us. This may, for instance be information you enter into our contact form.

Our IT systems automatically record other data when you visit our website. This data comprises primarily technical information (e.g. web browser, operating system or time the site was accessed). This information is recorded automatically when you access our website.

What are the purposes we use your data for?

A portion of the information is generated to guarantee the error free provision of the website. Other data may be used to analyse your user patterns.

What rights do you have as far as your information is concerned?

You have the right to receive information about the source, recipients and purposes of your archived personal data at any time without having to pay a fee for such disclosures. You also have the right to demand that your data are rectified, blocked or eradicated. Please do not hesitate to contact us at any time under the address disclosed in section "Information Required by Law" on this website if you have questions about this or any other data protection related issues. You also have the right to log a complaint with the competent supervising agency.

Moreover, under certain circumstances, you have the right to demand the restriction of the processing of your personal data. For details, please consult the Data Protection Declaration under section "Right to Restriction of Data Processing."

### Analysis tools and tools provided by third parties

There is a possibility that your browsing patterns will be statistically analysed when you visit our website. Such analyses are performed primarily with cookies and with what we refer to as analysis programmes. As a rule, the analyses of your browsing patterns are conducted anonymously; i.e. the browsing patterns cannot be traced back to you. You have the option to object to such analyses or you can prevent their performance by not using certain tools. For detailed information about this, please consult our Data Protection Declaration below.

You do have the option to object to such analyses. We will brief you on the objection options in this Data Protection Declaration.

## 2. General information and mandatory information

### Data protection

The operators of this website and its pages take the protection of your personal data very seriously. Hence, we handle your personal data as confidential information and in compliance with the statutory data protection regulations and this Data Protection Declaration.

Whenever you use this website, a variety of personal information will be collected. Personal data comprises data that can be used to personally identify you. This Data Protection Declaration explains which data we collect as

well as the purposes we use this data for. It also explains how, and for which purpose the information is collected.

We herewith advise you that the transmission of data via the Internet (i.e. through e-mail communications) may be prone to security gaps. It is not possible to completely protect data against third party access.

Information about the responsible party (referred to as the "controller" in the GDPR)  
The data processing controller on this website is:

Orbital Group International Ltd.  
69 Great Hampton Street, GB - B18 6EW Birmingham - The United Kingdom of Great Britain and Northern Ireland  
- Company Number: 06327953

Telephone: +44 121 288 0833  
Email: orbital@orbital.eu.com

The controller is the natural person or legal entity that single-handedly or jointly with others makes decisions as to the purposes of and resources for the processing of personal data (e.g. names, e-mail addresses, etc.).

Revocation of your consent to the processing of data

A wide range of data processing transactions are possible only subject to your express consent. You can also revoke at any time any consent you have already given us. To do so, all you are required to do is send us an informal notification via e-mail. This shall be without prejudice to the lawfulness of any data collection that occurred prior to your revocation.

Right to object to the collection of data in special cases; right to object to direct advertising (Art. 21 GDPR)

In the event that data are processed on the basis of Art. 6 Sect. 1 lit. e or f GDPR, you have the right to at any time object to the processing of your personal data based on grounds arising from your unique situation. This also applies to any profiling based on these provisions. To determine the legal basis, on which any processing of data is based, please consult this Data Protection Declaration. If you log an objection, we will no longer process your affected personal data, unless we are in a position to present compelling protection worthy grounds for the processing of your data, that outweigh your interests, rights and freedoms or if the purpose of the processing is the claiming, exercising or defence of legal entitlements (objection pursuant to Art. 21 Sect. 1 GDPR).

If your personal data is being processed in order to engage in direct advertising, you have the right to at any time object to the processing of your affected personal data for the purposes of such advertising. This also applies to profiling to the extent that it is affiliated with such direct advertising. If you object, your personal data will subsequently no longer be used for direct advertising purposes (objection pursuant to Art. 21 Sect. 2 GDPR).

Right to log a complaint with the competent supervisory agency

In the event of violations of the GDPR, data subjects are entitled to log a complaint with a supervisory agency, in particular in the member state where they usually maintain their domicile, place of work or at the place where the alleged violation occurred. The right to log a complaint is in effect regardless of any other administrative or court proceedings available as legal recourses.

Right to data portability

You have the right to demand that we hand over any data we automatically process on the basis of your consent or in order to fulfil a contract be handed over to you or a third party in a commonly used, machine readable format. If you should demand the direct transfer of the data to another controller, this will be done only if it is technically feasible.

Information about, blockage, rectification and eradication of data

Within the scope of the applicable statutory provisions, you have the right to at any time demand information about your archived personal data, their source and recipients as well as the purpose of the processing of your data. You may also have a right to have your data rectified, blocked or eradicated. If you have questions about this subject matter or any other questions about personal data, please do not hesitate to contact us at any time at the address provided in section "Information Required by Law."

Right to demand processing restrictions

You have the right to demand the imposition of restrictions as far as the processing of your personal data is concerned. To do so, you may contact us at any time at the address provided in section "Information Required by Law." The right to demand restriction of processing applies in the following cases:

In the event that you should dispute the correctness of your data archived by us, we will usually need some time to verify this claim. During the time that this investigation is ongoing, you have the right to demand that we restrict the processing of your personal data.

If the processing of your personal data was/is conducted in an unlawful manner, you have the option to demand the restriction of the processing of your data in lieu of demanding the eradication of this data.

If we do not need your personal data any longer and you need it to exercise, defend or claim legal entitlements, you have the right to demand the restriction of the processing of your personal data instead of its eradication.

If you have raised an objection pursuant to Art. 21 Sect. 1 GDPR, your rights and our rights will have to be weighed against each other. As long as it has not been determined whose interests prevail, you have the right to demand a restriction of the processing of your personal data.

If you have restricted the processing of your personal data, these data – with the exception of their archiving – may be processed only subject to your consent or to claim, exercise or defend legal entitlements or to protect the rights of other natural persons or legal entities or for important public interest reasons cited by the European Union or a member state of the EU.

#### Rejection of unsolicited e-mails

We herewith object to the use of contact information published in conjunction with the mandatory information to be provided in section "Information Required by Law" to send us promotional and information material that we have not expressly requested. The operators of this website and its pages reserve the express right to take legal action in the event of the unsolicited sending of promotional information, for instance via SPAM messages.

### 3. Recording of data on our website

#### Cookies

In some instances, our website and its pages use so-called cookies. Cookies do not cause any damage to your computer and do not contain viruses. The purpose of cookies is to make our website more user friendly, effective and more secure. Cookies are small text files that are placed on your computer and stored by your browser.

Most of the cookies we use are so-called "session cookies." They are automatically deleted after you leave our site. Other cookies will remain archived on your device until you delete them. These cookies enable us to recognise your browser the next time you visit our website.

You can adjust the settings of your browser to make sure that you are notified every time cookies are placed and to enable you to accept cookies only in specific cases or to exclude the acceptance of cookies for specific situations or in general and to activate the automatic deletion of cookies when you close your browser. If you deactivate cookies, the functions of this website may be limited.

Cookies that are required for the performance of the electronic communications transaction or to provide certain functions you want to use (e.g. the shopping cart function), are stored on the basis of Art. 6 Sect. 1 lit. f GDPR. The website operator has a legitimate interest in storing cookies to ensure the technically error free and optimised provision of the operator's services. If other cookies (e.g. cookies for the analysis of your browsing patterns) should be stored, they are addressed separately in this Data Protection Declaration.

#### Server log files

The provider of this website and its pages automatically collects and stores information in so-called server log files, which your browser communicates to us automatically. The information comprises:

The type and version of browser used

The used operating system

Referrer URL

The hostname of the accessing computer

The time of the server inquiry

The IP address

This data is not merged with other data sources.

This data is recorded on the basis of Art. 6 Sect. 1 lit. f GDPR. The operator of the website has a legitimate interest in the technically error free depiction and the optimization of the operator's website. In order to achieve this, server log files must be recorded.

#### Contact form

If you submit inquiries to us via our contact form, the information provided in the contact form as well as any contact information provided therein will be stored by us in order to handle your inquiry and in the event that we have further questions. We will not share this information without your consent.

Hence, the processing of the data entered into the contact form occurs exclusively based on your consent (Art. 6 Sect. 1 lit. a GDPR). You have the right to revoke at any time any consent you have already given us. To do so, all you are required to do is send us an informal notification via e-mail. This shall be without prejudice to the lawfulness of any data collection that occurred prior to your revocation.

The information you have entered into the contact form shall remain with us until you ask us to eradicate the data, revoke your consent to the archiving of data or if the purpose for which the information is being archived no longer exists (e.g. after we have concluded our response to your inquiry). This shall be without prejudice to any mandatory legal provisions – in particular retention periods.

#### Registration on this website

You have the option to register on our website to be able to use additional website functions. We shall use the data you enter only for the purpose of using the respective offer or service you have registered for. The required information we request at the time of registration must be entered in full. Otherwise we shall reject the registration.

To notify you of any important changes to the scope of our portfolio or in the event of technical modifications, we shall use the e-mail address provided during the registration process.

We shall process the data entered during the registration process on the basis of your consent (Art. 6 Sect. 1 lit. a GDPR). You have the right to revoke at any time any consent you have already given us. To do so, all you are required to do is send us an informal notification via e-mail. This shall be without prejudice to the lawfulness of any data collection that occurred prior to your revocation.

The data recorded during the registration process shall be stored by us as long as you are registered on our website. Subsequently, such data shall be deleted. This shall be without prejudice to mandatory statutory retention obligations.

#### Processing of data (customer and contract data)

We collect, process and use personal data only to the extent necessary for the establishment, content organization or change of the legal relationship (data inventory). These actions are taken on the basis of Art. 6 Sect. 1 lit. b GDPR, which permits the processing of data for the fulfilment of a contract or pre-contractual actions. We collect, process and use personal data concerning the use of our website (usage data) only to the extent that this is necessary – to make it possible for users to utilize the services and to bill for them.

The collected customer data shall be eradicated upon completion of the order or the termination of the business relationship. This shall be without prejudice to any statutory retention mandates.

#### Data transfer upon closing of contracts for online stores, retailers and the shipment of merchandise

We share personal data with third parties only if this is necessary in conjunction with the handling of the contract; for instance, with companies entrusted with the shipment of goods or the financial institution tasked with the processing of payments. Any further transfer of data shall not occur or shall only occur if you have expressly consented to the transfer. Any sharing of your data with third parties in the absence of your express consent, for instance for advertising purposes, shall not occur.

The basis for the processing of data is Art. 6 Sect. 1 lit. b GDPR, which permits the processing of data for the fulfilment of a contract or for pre-contractual actions.

#### Data transfer upon closing of contracts for services and digital content

We share personal data with third parties only if this is necessary in conjunction with the handling of the contract; for instance, with the financial institution tasked with the processing of payments.

Any further transfer of data shall not occur or shall only occur if you have expressly consented to the transfer. Any sharing of your data with third parties in the absence of your express consent, for instance for advertising purposes, shall not occur.

The basis for the processing of data is Art. 6 Sect. 1 lit. b GDPR, which permits the processing of data for the fulfilment of a contract or for pre-contractual actions.

#### 4. Analysis tools and advertising

##### Google Analytics

This website uses functions of the web analysis service Google Analytics. The provider of this service is Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

Google Analytics uses so-called cookies. Cookies are text files, which are stored on your computer and that enable an analysis of the use of the website by users. The information generated by cookies on your use of this website is usually transferred to a Google server in the United States, where it is stored.

The storage of Google Analytics cookies and the utilization of this analysis tool are based on Art. 6 Sect. 1 lit. f GDPR. The operator of this website has a legitimate interest in the analysis of user patterns to optimize both, the services offered online and the operator's advertising activities.

##### Browser plug-in

You do have the option to prevent the archiving of cookies by making pertinent changes to the settings of your browser software. However, we have to point out that in this case you may not be able to use all of the functions of this website to their fullest extent. Moreover, you have the option prevent the recording of the data generated by the cookie and affiliated with your use of the website (including your IP address) by Google as well as the processing of this data by Google by downloading and installing the browser plug-in available under the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>.

##### Objection to the recording of data

You have the option to prevent the recording of your data by Google Analytics by clicking on the following link. This will result in the placement of an opt out cookie, which prevents the recording of your data during future visits to this website: Google Analytics deactivation.

For more information about the handling of user data by Google Analytics, please consult Google's Data Privacy Declaration at: <https://support.google.com/analytics/answer/6004245?hl=en>.

#### 5. Plug-ins and Tools

##### YouTube

Our website uses plug-ins of the YouTube platform, which is operated by Google. The website operator is YouTube, LLC, 901 Cherry Ave., San Bruno, CA 94066, USA.

If you visit a page on our website into which a YouTube plug-in has been integrated, a connection with YouTube's servers will be established. As a result, the YouTube server will be notified, which of our pages you have visited.

Furthermore, YouTube will be able to place various cookies on your device. With the assistance of these cookies, YouTube will be able to obtain information about our website visitor. Among other things, this information will be used to generate video statistics with the aim of improving the user friendliness of the site and to prevent attempts to commit fraud. These cookies will stay on your device until you delete them.

If you are logged into your YouTube account while you visit our site, you enable YouTube to directly allocate your browsing patterns to your personal profile. You have the option to prevent this by logging out of your YouTube account.

The use of YouTube is based on our interest in presenting our online content in an appealing manner. Pursuant to Art. 6 Sect. 1 lit. f GDPR, this is a legitimate interest.

For more information on how YouTube handles user data, please consult the YouTube Data Privacy Policy under: <https://policies.google.com/privacy?hl=en>.

#### Google Web Fonts

To ensure that fonts used on this website are uniform, this website uses so-called Web Fonts provided by Google. When you access a page on our website, your browser will load the required web fonts into your browser cache to correctly display text and fonts.

To do this, the browser you use will have to establish a connection with Google's servers. As a result, Google will learn that your IP address was used to access our website. The use of Google Web Fonts is based on our interest in presenting our online content in a uniform and appealing way. According to Art. 6 Sect. 1 lit. f GDPR, this is a legitimate interest.

If your browser should not support Web Fonts, a standard font installed on your computer will be used.

For more information on Google Web Fonts, please follow this link: <https://developers.google.com/fonts/faq> and consult Google's Data Privacy Declaration under: <https://policies.google.com/privacy?hl=en>.

#### Google reCAPTCHA

We use "Google reCAPTCHA" (hereinafter referred to as "reCAPTCHA") on our websites. The provider is Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google").

The purpose of reCAPTCHA is to determine whether data entered on our websites (e.g. information entered into a contact form) is being provided by a human user or by an automated program. To determine this, reCAPTCHA analyses the behaviour of the website visitors based on a variety of parameters. This analysis is triggered automatically as soon as the website visitor enters the site. For this analysis, reCAPTCHA evaluates a variety of data (e.g. IP address, time the website visitor spent on the site or cursor movements initiated by the user). The data tracked during such analyses are forwarded to Google.

reCAPTCHA analyses run entirely in the background. Website visitors are not alerted that an analysis is underway.

The data is processed on the basis of Art. 6 Sect. 1 lit. f GDPR. It is in the website operators legitimate interest, to protect the operator's web content against misuse by automated industrial espionage systems and against SPAM.

For more information about Google reCAPTCHA and to review the Data Privacy Declaration of Google, please follow these links: <https://policies.google.com/privacy?hl=en> and <https://www.google.com/recaptcha/intro/android.html>.

