

Data protection policy

This website is operated by EHG Stahlzentrum GmbH & Co KG, based in Wallenmahd 54, 6850 Dornbirn, Austria, tel.: +43 (0)5572 391-0, email: dornbirn@ehg-stahl.com ("we" or "us") as the party responsible for data protection. This data protection policy describes how we, as the party responsible for data protection, process your personal data in connection with this website.

1. Which of your data we process

In the course of your visit to this website, we will collect the following information:

the date and time a page on our website was accessed, the IP address, name and version of your web browser, the website (referrer URL) that you visited before accessing this website, certain cookies (see point 2), the operating system used, and the host name of the computer used to access the site. We will also process the information you provide yourself via the contact form, when registering for our newsletter or for our online shop, or via any emails you send to one of the email addresses specified on the website.

There is no obligation to actually provide the data that we request from you on our website. However, if you do not do this, you will not be able to use those functions of the website for which this data is requested.

2. Cookies

So-called "cookies" are used on this website. A cookie is a small file that can be stored on your computer when you visit a website. Essentially, cookies are used to offer the users of a website additional functions. They can be used, for example, to make it easier for you to navigate the website, to enable you to continue using a website where you left it and/or to remember your preferences and settings when you revisit the website. Cookies cannot access, read or change any other data on your computer.

Most of the cookies on this website are what is known as "session cookies". These are automatically deleted when you leave our website. Persistent cookies, on the other hand, remain on your computer until you manually delete them in your browser. We use persistent cookies in order to identify you the next time you visit our website.

If you want to control cookies on your computer, you can set your browser to send you a notification when a website wants to save cookies. You can also block or delete cookies if they have already been saved on your computer. If you would like to know more about how to take these steps, please use the "Help" function in your browser.

Please be aware that blocking or deleting cookies may affect your online experience and prevent you from being able to use all the functions of this website.

When you visit our website, the "Cookie settings" info banner appears, informing you about the use of cookies on our website as described in this data protection policy and giving you the opportunity to consent to the use of certain cookies. By providing your consent, you agree to the use of these cookies and the associated processing of your data. You may withdraw this consent at any time, either by changing the cookie settings on our website or by changing your browser settings. If consent is withdrawn, any data processing carried out with your consent prior to the withdrawal remains legal.

In the following sections "Technically required cookies", "Cookies for analysing browsing behaviour" and "Cookies for advertising purposes", we will explain which types of cookies we use and which data are processed by the respective cookies.



Where there is no mention of specific deletion periods in the following sections on cookies, the following shall apply in general with regard to the retention period: You can use the relevant browser settings to control whether and which cookies are applied. Most browsers are set by default to allow the unrestricted use of cookies. You can change and restrict this or block the use of cookies altogether. You can also delete cookies that have been applied in your browser at any time; and there is also a browser setting for the automatic deletion of cookies. If you would like to know more about how to take these steps, please use the "Help" function in your browser.

Please be aware that blocking or deleting cookies may affect your online experience and prevent you from being able to use all the functions of this website.

2.1 Technically required cookies

Certain functions of this website rely on the use of cookies. For these functions, cookies are required for technical reasons. This includes the country settings, the customer login, the selection of goods, the shopping cart and the ordering process in the online shop, or remembering search terms on our website. The purpose of these cookies is to offer and perform these functions. The legal basis for applying the technically required cookies and the associated processing is our legitimate interest, which is to achieve these purposes.

2.2 Cookies for analysing browsing behaviour

We use cookies on our website that enable us to analyse your browsing and usage behaviour on our website; namely cookies from Matomo (you can find out more about this under point 8). We use these cookies to analyse which search terms you enter into our site, which functions you use how often and for how long, and which sub-pages of our website you visit how often and for how long. The data collected in this way is pseudonymised by technical precautions. The data can therefore no longer be traced back to you. The data is also not stored together with your other data. The data collected enables us to continuously optimise our website and its functions and to adapt them to your needs. The legal basis for applying the cookies used for this purpose and the associated processing is your consent, which can be withdrawn at any time.

3. Purposes of data processing

We will process your personal data for the following purposes:

- a. to make this website available to you and to further improve and develop this website;
- b. to detect, prevent and investigate attacks on our website;
- c. to respond to your inquiries;
- d. to process your orders in the online shop;
- e. to analyse your use of our website and to enable us to create usage statistics;
- f. tosend you our newsletter and to conduct surveys about how satisfied you are with our products and services.



4. Legal bases for processing

The legal basis for processing your personal data is

- for the processing specified under 3a-c: our overriding legitimate interest, which is to achieve the purposes stated under point 3a-c above;
- for the processing specified under 3d: the requirement to fulfil the contract concluded with you in the online shop or any pre-contractual measures;
- for the processing specified under 3e: your consent;
- for sending our newsletter and customer surveys (section 107, paragraph 3 of the Telecommunications Act [TKG]): if we have received your email address in connection with the sale of goods or services to you, otherwise it is your consent.

Once granted, you may withdraw your consent to certain types of processing at any time independently of one another, without affecting the legality of any processing carried out on the basis of your consent prior to its withdrawal.

5. Sharing of your personal data (recipients)

For the above purposes, we will share your personal data with the following recipients:

- IT service providers used by us, namely Massive Art Webservice GmbH, A-6850 Dornbirn, Gütlestraße 7a;
- InnoCraft Ltd., 150 Willis St, 6011 Wellington, New Zealand (Matomo, see point 8);
- Sendinblue GmbH, Köpenicker Straße 126, D-10179 Berlin (newsletter service provider, see point 13);
- the service providers entrusted with the processing of your orders in the online shop, e.g. couriers.

If you click on the social media plugins on this website or participate in a video conference, your personal data will be shared with the following recipients:

- Instagram LLC., 1601 Willow Road, Menlo Park, CA 94025, USA (see point 9 Instagram)
- Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA (see point 10 about Facebook and point 11 about the Facebook fan page)
- LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2 Ireland (see point 12 LinkedIn)
- Microsoft Corporation based in One Microsoft Way, Redmond, WA 98052-6399, USA (see point 14 Video conferences)

Some of the above recipients are located outside the European Economic Area (EEA) or may process your personal data there. The level of data protection outside the EEA may not be the same as in your country. However, we only transfer your personal data to countries which the EU Commission has deemed to have an adequate level of data protection, or otherwise we take additional measures to ensure that all recipients have an adequate level of data protection. For example, we conclude standard contractual clauses to ensure this. These are available on request from dornbirn@ehg-stahl.com.

Facebook Inc., Instagram LLC and Microsoft Corporation are "US providers".

In accordance with the GDPR, data is shared with US providers in the USA without specific guarantees. There is a risk for you that these recipients cannot comply with the requirements of European data protection regulations. US data protection law does not grant your data the same protection as the GDPR, and in particular you only have very limited rights as a data subject. There is also the risk that US authorities will access your data for control and monitoring purposes.



When consenting to the use of cookies, if you select "Yes, accept all cookies including US providers", you are consenting to the use of cookies and the associated transmission of your data to the above-mentioned US providers in the USA in accordance with this data protection policy. You can withdraw this consent at any time by changing the cookie settings.

6. Retention period (unless otherwise stated in this data protection policy)

We will store the data specified in point 3a-c for a period of three months. The data will only be stored for longer if this is necessary to investigate attacks on our website.

We will store the data that we process on the basis of your consent until we receive your withdrawal and for as long as is required by law.

We will store data that we process to fulfil the contract at least until the contract has been mutually completely fulfilled and any claim periods have expired. We will also store your data as required by statutory retention periods.

In the event of legal disputes or official or court proceedings, we will store the data in question until these matters have been legally concluded.

7. Your rights in relation to the processing of personal data

In accordance with the applicable data protection law, you have the right to information, rectification, erasure, restriction of processing, objection and portability as far as your data is concerned.

You have the right to complain to a supervisory authority within the EU or to the Austrian Data Protection Authority in Vienna if you think that there has been an infringement of European or Austrian data protection law.

8. Matomo

We use the "Matomo" software (www.matomo.org) onthis website, which is a service provided by InnoCraft Ltd., 150 Willis St, 6011 Wellington, New Zealand.

The software places a cookie (a text file) on your computer, which is used to identify your browser. If sub-pages of our website are accessed, the following data is stored:

- the IP address of the user, shortened by the last two bytes (anonymised)
- the sub-page accessed and the time at which it was accessed
- the website from which the user came to our website (referrer)
- the browser and plugins used when accessing the website, as well as the operating system and screen resolution
- the dwell time, i.e. how long the user stayed on the website
- the pages that were navigated to from the sub-page accessed

The data collected by Matomo is stored on our own servers. This data is not transferred to any third parties.

The legal basis on which we process personal data using Matomo is your consent given in the cookie consent form, which you can withdraw there at any time with future effect.



9. Instagram

Our website uses so-called social plugins ("plugins") from Instagram, which is operated by Instagram LLC., 1601 Willow Road, Menlo Park, CA 94025, USA ("Instagram").

These plugins are marked with an Instagram logo, for example in the form of an "Instagram camera". If you click on the logo, your browser establishes a direct connection to the Instagram servers. The content of the plugin is transmitted directly from Instagram to your browser and integrated into the page. The integrated content means that Instagram receives the information that your browser has accessed the corresponding page of our website, even if you do not have an Instagram profile or are not currently logged into Instagram. This information (including your IP address) is transmitted directly from your browser to an **Instagram server in the USA** and stored there.

If you are logged into Instagram, Instagram can immediately assign your visit to our website to your Instagram account. If you interact with the plugins, for example by clicking the Instagram icon, this information is also transmitted directly to an Instagram server and stored there. The information is also published on your Instagram account and displayed to your contacts there.

The purpose and scope of the data collection and the further processing and use of the data by Instagram, as well as your rights and privacy protection settings in relation to this, can be found in Instagram's data protection information: https://help.instagram.com/155833707900388/

If you do not want Instagram to directly assign the data collected via our website to your Instagram account, you must log out of Instagram before visiting our website. You can also completely prevent the Instagram plugins from loading with add-ons for your browser, e.g. with the script blocker "NoScript" (https://noscript.net/).

10. Facebook

Our website uses so-called social plugins ("plugins") from Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA ("Facebook").

These plugins are marked with a Facebook logo. If you click on the logo, your browser establishes a direct connection to the Facebook servers. The content of the plugin is transmitted directly from Facebook to your browser and integrated into the page. The integrated content means that Facebook receives the information that your browser has accessed the corresponding page of our website, even if you do not have a Facebook profile or are not currently logged into Facebook. This information (including your IP address) is transmitted directly from your browser to a **Facebook server** in the USA and stored there.

If you are logged into Facebook, Facebook can immediately assign your visit to our website to your Facebook account. If you interact with the plugins, for example by clicking the Facebook icon, this information is also transmitted directly to a Facebook server and stored there. The information is also published on your Facebook account and displayed to your contacts there.

The legal basis for this processing is your consent, which you provide by enabling this processing in our cookie consent window, which appears when you access our website. In the same way, you can withdraw consent there at any time by deactivating it.



11. Facebook fan page

Our company operates a fan page on Facebook. When this fan page is integrated into our website, or at least when you visit this fan page, Facebook applies cookies to your end device, regardless of whether or not you are a Facebook user yourself. If you are unsure what cookies are, please see point 2 of this data protection policy.

Facebook uses these cookies to evaluate your behaviour on our fan page according to certain criteria and to make this evaluation available to us anonymously. Facebook calls this service "Facebook Insights". Further information on the processing of Insights data can be found at https://www.facebook.com/legal/terms/information_about_page_insights_data

The Insights data is anonymous to us, but not to Facebook if you are a Facebook user. In this case, Facebook can assign this data to your user account. You can find out more about this in Facebook's data protection policy.

Facebook Ireland and ourselves are jointly responsible for ensuring that data from Facebook Insights is processed in accordance with Article 26 of the GDPR. Facebook Ireland is primarily responsible for processing the Insights data. We do not make any decisions regarding the processing of the Insights data. In particular, we do not have any control over other recipients of this data or the retention period of the cookies used for this purpose on the end devices.

You can assert your data subject rights either with Facebook Ireland or with us.

We have entered into a controller agreement with Facebook Ireland, the essential content of which is available from Facebook Ireland here: https://www.facebook.com/legal/terms/page_controller_addendum

The legal basis for processing Insights data is your consent, which you declare by enabling this processing in our cookie consent window, which appears when you access our website. In the same way, you can withdraw consent there at any time by deactivating it.

12. LinkedIn

Our website uses so-called social plugins ("plugins") from LinkedIn, which is operated by LinkedIn Ireland Unlimited Company (Wilton Plaza, Wilton Place, Dublin 2 Ireland).

These plugins are marked with a LinkedIn logo. If you click on the logo, your browser establishes a direct connection to the LinkedIn servers. The content of the plugin is transmitted directly from LinkedIn to your browser and integrated into the page. The integrated content means that LinkedIn receives the information that your browser has accessed the corresponding page of our website, even if you do not have a LinkedIn profile or are not currently logged into LinkedIn. This information (including your IP address) is transmitted directly from your browser to a LinkedIn server and stored there.

If you are logged into LinkedIn, LinkedIn can immediately assign your visit to our website to your LinkedIn account. If you interact with the plugins, for example by clicking the LinkedIn icon, this information is also transmitted directly to a LinkedIn server and stored there. The information is also published on your LinkedIn account and displayed to your contacts there.

The legal basis for this processing is your consent, which you provide by enabling this processing in our cookie consent window, which appears when you access our website. In the same way, you can withdraw consent there at any time by deactivating it.



The purpose and scope of the data collection and the further processing and use of the data by LinkedIn, as well as your rights and privacy protection settings in relation to this, can be found in Instagram's data protection information: https://www.linkedin.com/legal/privacy-policy?_l=de_DE.

13. Newsletter

If you would like to receive the newsletter offered on the website, all we need from you is an email address. No other data is required.

If you voluntarily provide your first and last name, we can address you personally in the newsletter.

We use the data you provide exclusively for the monthly dispatch of our newsletter, which contains information about our products and services, in particular about the short lengths currently in stock, alloy surcharges and scrap surcharges, as well as any offers or general news from our company and surveys about how satisfied you are with our products and services.

After registering for the newsletter, you will receive a confirmation email from us so that we can check whether you actually own the email address provided and whether you agree to receiving the newsletter. You will only be registered for the newsletter once you confirm this email address (double opt-in).

When you register for the newsletter, we save your IP address entered by the Internet Service Provider (ISP), as well as the date and time of registration, in order to be able to trace any possible misuse of your email address in the future.

The processing of the data for the purpose of sending our newsletter is based on your consent. You may withdraw this consent at any time with future effect, for example via the "Unsubscribe" link in the newsletter. You may also contact us directly to withdraw your consent by sending an email to dornbirn@ehg-stahl.at. If consent is withdrawn, any data processing carried out with your consent prior to the withdrawal remains unaffected.

The data you have provided us with for the purpose of subscribing to the newsletter will be stored by us until you unsubscribe from the newsletter and will be deleted after you have cancelled the newsletter.

We use the Newsletter2Go software from Sendinblue GmbH, Köpenicker Straße 126, D-10179 Berlin to process our newsletter.

14. Video conferences

For video conferencing, we use MS Teams – a service provided by Microsoft Corporation, based in One Microsoft Way, Redmond, WA 98052-6399, USA. In a video conference via MS Teams, in addition to the IP address and the content of the call, the data that you enter or upload yourself is shared with Microsoft. If you enable your camera, your image data will also be sent to Microsoft.

We have concluded standard contractual clauses with Microsoft that are intended to ensure compliance with European standards of data protection. However, we cannot guarantee that US law will allow Microsoft to comply with these standard contractual clauses. We therefore cannot rule out the possibility that data will be transmitted to Microsoft in the USA without suitable guarantees in accordance with the GDPR. There is a risk for you that recipients in the USA may not be able to comply with the requirements of European data protection regulations. US data protection law does not grant your data the same protection as the GDPR, and in particular you only have very limited rights as a data subject. There is also the risk that US authorities will access your data for control and monitoring purposes.



15. Our contact details

If you have any questions or concerns about the processing of your personal data, please do not hesitate to contact us. Our contact details can be found on the contact page of this website.

Last updated on November 11, 2022.