

Privacy Policy

for Our Customers, Subcontractors, Suppliers
and Service Providers



Preamble

This **Privacy Policy** for customers, subcontractors, suppliers, and service providers provides you with information about the processing of your personal data in connection with your business relationship (or that of your employer) with ONP Management GmbH (hereinafter referred to as "**ONP**").

This notice also contains a summary of your rights in relation to your personal data.

The **Error! Reference source not found.** explains certain terms used in this notice.

1.1 Controller

ONP is the controller responsible for the processing of all personal data.

Address:

ONP Management GmbH
Harburger Schloßstr. 24
21079 Hamburg
Germany

Managing Directors:

Martin Rahtge
Knud Grimm

Data Protection Officer:

datenschutz nord GmbH
Konsul-Smidt-Straße 88
28217 Bremen
Germany

E-Mail: office@datenschutz-nord.de

1.2 What personal data is processed?

- Personal Identification Information
- Contact Details
- Personal data
- Address data
- Current job

- Professional Experience
- Contract data
- Bank details

1.3 From whom is the data obtained?

- Employees of customers/subcontractors/suppliers/service providers provide information as part of the establishment of business relationships and update them during the duration of the business relationship
- Employees of subcontractors / suppliers / service providers provide information as part of the registration process
- Public sources: Information obtained from publicly accessible sources (e.g. commercial registers, population registers, media, business directories, internet)
- Credit Bureaus
- Sanctions Lists

No special personal data within the meaning of the GDPR will be processed.

1.4 Purposes of processing

We process your personal data for the following purposes:

- Maintaining business relationships
- Registration of subcontractors, suppliers and service providers
- Execution of business processes
- Execution of orders
- Fulfilment of legal obligations
- Fulfilment of receivables

1.5 Legal basis for processing

The data is processed to fulfil contractual obligations (Art. 6 para. 1 lit. b GDPR), in particular

- for the possible establishment of a business relationship between the customer, subcontractor, supplier or service provider
- for the execution of orders
- for the execution of a business relationship between the customer, subcontractor, supplier or service provider
- for payment processing within a business relationship of the customer

to comply with legal obligations to which we are subject (Art. 6 para. 1 lit. c GDPR) and to protect our legitimate interests (Art. 6 para. 1 lit. f GDPR).

Insofar as we process personal data to safeguard our legitimate interests, these are in particular:

- Maintain business relationships with customers, subcontractors, suppliers and service providers
- Win customers, subcontractors, suppliers and service providers and inform existing customers about products
- Assert claims against the customer, subcontractor, supplier or service provider

1.6 Recipients of the data

- Employees of the ONP
- Subcontractors
- Customers
- Credit institutions
- Debt collection service providers

1.7 Data transfer to third countries

Data will not be transferred to third countries.

1.8 Storage period

- Duration of the business relationship
- Commercial and tax retention periods
- Period of possible claims

1.9 Rights of the data subject

1.9.1 Right to information

You have the right to obtain confirmation from **ONP** as to whether personal data concerning you is being processed; if this is the case, you have the right to access this personal data and to receive detailed information on how the personal data is being processed.

1.9.2 Right to rectification

You have the right to request the rectification of inaccurate personal data concerning you without undue delay. Taking into account the purposes of the processing, you have the right to request the completion of incomplete personal data, including by means of a supplementary statement.

1.9.3 Right to erasure

You have the right to request the immediate deletion of your personal data from us, provided certain conditions are met.

1.9.4 Right to restriction of processing

You have the right to demand that we restrict your processing if certain conditions are met.

1.9.5 Right to object

You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you when the processing is carried out for the performance of a task carried out in the public interest or for the purposes of the legitimate interests pursued by the controller (including profiling) or for marketing purposes.

1.9.6 Right to data portability

Under certain conditions, you have the right to receive the personal data concerning you that you have provided to the ONP in a structured, commonly used and machine-readable format, and you have the right to transmit these data to another controller without hindrance from the ONP.

ONP

Management

1.9.7 Right to withdraw consent

If the processing is based on consent, you have the right to withdraw your consent at any time.

1.9.8 Right to lodge a complaint

You have the right to lodge a complaint with a supervisory authority - in Germany, this is the respective state data protection officer.

1.10 Publisher

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1.11 Revision control

Revision	Date	Reason for Issue	Prepared	Checked	Approved
0	08.04.2026	First version	K. Sauer	E. Bielefeld	K. Grimm

1.12 Glossary

Term	Definition
Controller	The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
Data subject	Identified or identifiable natural person to whom the personal data relates.
GDPR	General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament).
BDSG	Federal Data Protection Act of 30.06.2017 (BGBl. I p. 2097).
Legal basis	<p>The processing is only lawful if at least one of the conditions according to the GDPR and/or BDSG is met:</p> <ul style="list-style-type: none"> • The data subject has given his or her consent to the processing of personal data concerning him/her; • the processing is necessary for the performance of a contract to which the data subject is a party; • the processing is necessary for compliance with a legal obligation; • the processing is necessary to protect the vital interests of the data subject or of another natural person; • the processing is necessary for the purposes of the legitimate interests pursued by the controller or a third party, unless such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data (legitimate interest)
Personal data	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, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
Processing	Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or any other means. Form of deployment, alignment or linking, restriction, deletion or destruction.
Special categories of personal data	Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, as well as the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, health data or data concerning sex life or sexual orientation.