

## 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](mailto:dornbirn@ehg-stahl.com) ("we" or "us") as the controller under data protection law. 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 explain which types of cookies we use and what data is processed by the respective cookies.

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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 storage of your cookie settings, 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 Google Analytics (you can find out more about this under point 8) and Mouseflow. We use these cookies to analyse which search terms you enter into our site, which functions you use how often and for how long, which sub-pages of our website you visit how often and for how long, what you click on and whether and how you move the mouse. 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.

### 2.3 Cookies for advertising purposes

Our website uses the Meta Pixel of Meta Platform Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA and Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland ("Facebook"), and Google Ads and Google Conversion Tracking of Google Inc., 1600 Amphitheatre Parkway Mountain View, CA 94043, USA, and Google Ireland Limited, Gordon House, Barrow Street, Dublin 4 for advertising purposes and conversion measurement. You can find out more about this under sections 13 (Google Ads and Conversion Tracking) and 15 (Meta Pixel) of this data protection policy.

## 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 enquiries;
- d. to process your orders in the online shop;
- e. to analyse your use of our website, carry out conversion measurements and remarketing and to compile usage statistics;
- f. to send you our newsletter and to conduct surveys about how satisfied you are with our products and services.

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### 4. Legal basis 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 174, paragraph 4 of the Telecommunications Act [TKG]) or comparable provisions of other countries: 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
- Google Inc., 1600 Amphitheatre Parkway Mountain View, CA 94043, USA, and Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, in accordance with section 8 (Google Analytics), section 13 (Google Ads and Google Conversion Tracking) and section 14 (Google Tag Manager)
- Sendinblue GmbH, Köpenicker Straße 126, D-10179 Berlin (newsletter service provider, see point 10)
- service providers entrusted with the processing of your orders in the online shop; e.g. couriers will receive the delivery address and, if applicable, your mobile phone number in order to deliver the goods ordered by you
- Mouseflow ApS, Flaesketorvet 68, 1711 Copenhagen, Denmark (in accordance with point 12)
- Meta Platforms Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA, Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland in accordance with section 15 (Facebook visitor action pixel)

If you participate in a video conference, personal data will be sent to Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA (see point 14 – Video conferences). Microsoft Corporation, Meta Platforms Inc. and Google LLC are certified in accordance with the EU-US Data Privacy Framework.

This corporation is obliged to comply with the provisions of European data protection law.

### 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 data that we process on the basis of your consent until such a time as we receive notification that you wish to withdraw it.

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We will store data that we process to fulfil the contract at least until the contract has been completely fulfilled on both sides. We retain data from contract and order processing (correspondence, order data, order confirmation data, invoice data, delivery note data, payment data) for three years from delivery, and we retain data relevant to tax law (invoice data, delivery note data, payment data) for seven years from delivery.

If you register with our online shop or otherwise on our website, we will store your master data for as long as your account exists.

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.

We store data processed in connection with your enquiries for 18 months after the last contact.

## 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.

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. Google Analytics

This website uses Google Analytics 4, a web analysis service of Google Inc., 1600 Amphitheatre Parkway Mountain View, CA 94043, USA ("Google"), provided in the European Union by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4.

Google Analytics uses cookies, scripts and pixels that enable the analysis of your use of the website. Data such as time spent on the website, language and location, the browser used to access the website, the operating system and the screen size, as well as events such as clicks, scrolls, downloads and page views are recorded.

Using identifiers (user ID, Google ID, device ID), which Google stores in your end device by means of cookies, Google Analytics 4 is able to use algorithms and machine learning to recognise usage behaviour across devices from the data and events collected and to automatically combine the sessions into a uniform cross-device user experience.

According to Google, the information generated by the cookie about your use of this website is transmitted to and stored by Google on servers in Ireland. We do not store any of your data collected in connection with Google Analytics 4.

IP anonymisation is pre-set in Google Analytics 4.

Google uses this information on our behalf for the purpose of evaluating your use of the website, compiling reports on website activity and providing us with other services relating to website activity and internet usage.

The tracking technologies described above are used on the basis of your consent, which is granted in the cookie settings. You can revoke this in the cookie settings at any time with effect for the future by deactivating tracking.

You can prevent the storage of cookies by selecting the appropriate settings in your browser software. However, we would like to point out that this may prevent you from using some of the functions of this website to their full extent. You can also prevent Google from collecting your data in conjunction with Google Analytics by downloading and installing

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the browser plug-in available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>.  
You can find more information on Google's terms of use and Google's privacy policy at: [www.google.at/intl/at/policies/](http://www.google.at/intl/at/policies/).

## 9. Use of social media (share) links

Links to our online presence on social networks are embedded in our website. The links are identified by the generally recognised icons of these networks. When you click on these icons, the link associated with the respective icon will take you to our respective online presence. Below we explain which online presences we have and what forms of data processing may be associated with visiting these online presences.

### Facebook fan page

Our company operates a fan page on Facebook, the social media platform of Meta Platforms Inc, 1601 S. California Ave, Palo Alto, CA 94304, USA or Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland ("Facebook"). When you visit this fan page, for example by clicking on the corresponding link marked with a Facebook symbol on our website, Facebook places cookies on your end device, regardless of whether or not you are a Facebook user yourself. If you are unsure what cookies are, please see point 2.1 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 about the processing of Insights data can be found at [https://www.facebook.com/legal/terms/information\\_about\\_page\\_insights\\_data](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](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.

### Instagram

Our company has an Instagram account. Instagram is a social network operated by Instagram LLC, 1601 Willow Road, Menlo Park, CA 94025, USA ("Instagram").

The link to this account is marked with an Instagram logo, for example in the form of an "Instagram camera". If you click on the logo, you will be redirected to our Instagram account. This 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.

For further information about the processing and use of data by Instagram, your rights in this regard and the settings available to protect your privacy, please refer to Instagram's privacy policy: <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 can 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/>).

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### LinkedIn

We have a company page on LinkedIn, which is operated by LinkedIn Ireland Unlimited Company (Wilton Plaza, Wilton Place, Dublin 2 Ireland).

If you follow our LinkedIn company page or visit the page, for example by clicking on the LinkedIn logo on our website, LinkedIn processes your profile data (position, country, industry, length of service, company size, employment status) and how you interact with our company page.

If you click on the LinkedIn logo on our website, 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.

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 LinkedIn's privacy policy: [https://www.linkedin.com/legal/privacy-policy?l=de\\_DE](https://www.linkedin.com/legal/privacy-policy?l=de_DE).

## 10. 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](mailto: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.

## 11. 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.

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### 12. Mouseflow

This website uses Mouseflow, a web analysis tool from Mouseflow ApS, Flaesketoerret 68, 1711 Copenhagen, Denmark.

Mouseflow sets cookies – if you agree to this in the cookie banner – and records how you use your mouse on our website, i.e. your clicking and scrolling and your mouse movements, but also your keystrokes when filling out forms, the pages and content you view on our website,

the time you spend on our site and technical data such as the browser used, the operating system, the type of end device used, the screen resolution, the type of visitor (first-time or returning), the referrer URL, the anonymised IP address, the location (city and country) and the language used.

In this way, an anonymous log of mouse movements and clicks is created, which enables us to randomly play back individual website visits and accordingly identify ways of improving our website.

The legal basis for the setting of cookies and the associated processing of personal data is your consent given in the cookie banner, which you can withdraw there at any time with future effect. Alternatively, you can stop Mouseflow from collecting your data by following the link <https://mouseflow.com/opt-out/>.

### 13. Google Ads and Google Conversion Tracking

This website uses Google AdWords. AdWords is an online advertising program of Google Inc., 1600 Amphitheatre Parkway Mountain View, CA 94043, USA, provided in the European Union by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4.

Google Ads enables us to use keyword targeting, which means that if a user enters a specific search term in the Google search engine or on third-party websites, we can show them the relevant advertising.

Google Ads also allows us to target audiences by using the data that Google has collected about users (e.g. location data or specific interests) to display targeted advertising to these users.

For example, we can evaluate the search terms that result in our ads being displayed, as well as which of our ads lead to further clicks. We do not receive any personal data.

We use the targeting described above on the basis of your consent, which is granted in the cookie settings. You can revoke this consent in the cookie settings at any time with effect for the future by deactivating this targeting.

We use Google Conversion Tracking within the framework of Google Ads. When you click on an ad placed by us, Google sets a cookie (or otherwise uses a tracking technology). You will be redirected to our site, and Google and we can recognise that you have been redirected to this site via the ad and identify what actions you take on our site (e.g. what you click on, what you look at, what you buy).

The information collected using the conversion cookie is used to create conversion statistics. We are informed of the total number of users who have clicked on our ads and been redirected to our site, as well as the actions that these users took. However, we do not receive any information that can be used to personally identify users.

We use conversion tracking on the basis of your consent, which is granted in the cookie settings. You can revoke this consent in the cookie settings at any time with effect for the future by deactivating conversion tracking.



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Alternatively, you can deactivate the Google Conversion Tracking cookie via your internet browser under the user settings, after which you will no longer be included in the conversion tracking statistics.

You can find more information about Google Ads and Google Conversion Tracking in Google's privacy policy: <https://policies.google.com/privacy>.

### 14. Google Tag Manager

We use Google Tag Manager on this website. It is a tag management system of Google Inc., 1600 Amphitheatre Parkway Mountain View, CA 94043, USA ("Google"), provided in the European Union by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4.

When you visit our website, the tag manager establishes a connection to Google's servers. At this time, the IP address may be transmitted to Google LLC in the USA. We therefore obtain your permission in the cookie consent before using Google Tag Manager.

Google Tag Manager is a solution offered by Google that allows website operators to manage website tags via an interface. The tag manager (which implements the tags) sets cookies – provided you have consented to this – but does not collect any personal data according to Google. It triggers other tags, which in turn may collect data. If this does occur on this website (e.g. Google Analytics, Meta Pixel), you will find information about this in this data protection policy. Google Tag Manager does not access this data. If deactivation has taken place at domain or cookie level, this remains effective for all tracking tags that are implemented with Google Tag Manager. Google Tag Manager does not change your cookie settings. You can find further information about this at <https://marketingplatform.google.com/about/analytics/tag-manager/use-policy/>.

### 15. Meta Pixel (remarketing)

Our website uses the Meta Pixel of Meta Platforms Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA and – for the European Union – of Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland ("Facebook") to measure conversions.

The Meta Pixel can be used to track the behaviour of visitors to the site after they have been redirected to our website by clicking on a Facebook ad. Furthermore, page visitors who log in to Facebook can be shown advertisements from us there. This allows the effectiveness of Facebook ads to be evaluated for statistical and market research purposes, and enables future advertising measures to be optimised. The data collected is anonymous to us as the operator of this website; we cannot draw any conclusions about the identity of the users.

However, the data is stored and processed by Facebook. As such, a connection to the respective user profile by Facebook is possible and Facebook can use the data for its own advertising purposes in accordance with the Facebook data usage policy. This allows Facebook to place advertisements on Facebook pages and outside of Facebook. This use of the data cannot be influenced by us as the site operator.

You can find further information on protecting your privacy in Facebook's privacy policy: [www.facebook.com/about/privacy/](http://www.facebook.com/about/privacy/). You can also deactivate the remarketing function "Custom Audiences" in the settings for ads by visiting the page: [www.facebook.com/ads/preferences/](http://www.facebook.com/ads/preferences/). To do this, you must be logged in to Facebook. If you do not have a Facebook account, you can deactivate usage-based advertising from Facebook on the website of the European Interactive Digital Advertising Alliance: <https://www.youronlinechoices.com/uk/your-ad-choices>.

The use of the Meta Pixel and the associated tracking is based on your consent, which you give in our cookie consent and can revoke at any time with effect for the future. You can also withdraw this consent by deactivating it in your Facebook account. With regard to the data collected via our website and forwarded to Facebook, we are joint controllers together with Meta Platforms Ireland Limited as set out in Art. 26 GDPR. We have entered into a controller agreement with Facebook Ireland to this effect, the essential content of which is available from Facebook Ireland here: [https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum).



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Responsibility for the further processing of the data forwarded to Facebook by Facebook lies solely with Facebook. We do not make any decisions regarding the processing of the data by Facebook. In particular, we do not have any control over other recipients of this data or the retention period of the tracking technologies used on the user's end devices. You can assert your rights as a data subject regarding the forwarded data either with Meta Platforms Ireland Limited or with us. If you do this with us, we will forward your request to Facebook if it concerns the further processing of the data by Facebook.

### 16. 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 04/12/2024.