Data protection statement
(As of February 2025)

§ 1 General Information
XAL places high priority on handling personal data responsibly. We want you to be aware of the data that we collect from you, when we collect it and how we use it. We have undertaken the necessary technical and organisational steps to ensure that data protection regulations are observed both by us and by our external service providers.

§ 2 Responsible Entity
Within the meaning of the General Data Protection Regulation (GDPR), the operator of this website and the entity responsible is XAL North America Inc., 8380 NW 64th Street, Miami, FL 33166. If you have any questions about data protection or the processing of your personal data, please contact us at:

XAL North America Inc.
8380 NW 64th Street, Miami, FL 33166
office.us@xal.com
+1 (305) 399-9301

§ 3 Data Processed
We process various categories of your personal data, which are dependent on whether you visit our website, whether you subscribe to our newsletter, whether you agree to the use of cookies and which you allow, or if you enter into a business relationship with us.

3.1 Data processed when you visit our website
You can visit our website without providing any information about yourself, we only save the initial access data in a log file. We understand initial access data to mean the date and time of access, the IP address in anonymous form (the last three digits are not displayed), the session ID, the pages accessed on our website and for how long it was accessed, the name of the website from which our website was accessed and information about the browser used. We evaluate this data exclusively to improve our website and no conclusions are drawn about your person. You can also disable the storage of this anonymized data via opt-out.

3.2 Processed data with consent to cookies
If you agree to the use of cookies, each cookie processes different data about you (e.g. IP address, location, browser language, user behaviour, etc.). You can find more detailed information about the cookies we use under Section 9 of this Data Protection Statement and in our Cookie Policy.

3.3 Data processed when you subscribe to our newsletter
If you subscribe to our newsletter, we will process specifically your name and e-mail address for registration. In order to provide you with targeted information, we also collect and process the industry sector in which you work and the country in which you are based, if you provide this data voluntarily. This data is stored for the duration of subscription to the newsletter. If you have subscribed to our newsletter, we also keep a record of the newsletter articles you have viewed. You can revoke your newsletter subscription and the consent you have given to processing of your personal data, at any time, in writing. You can revoke your consent at any time by clicking on the link in the newsletter, in writing, by sending an email to newsletter@xal.com, or by adjusting your preferences on our website. We will then immediately delete all of your personal data related to delivery of the newsletter.

3.4 Data processed when contacting us
If you contact us e.g., by e-mail or a contact form (existing or yet to be implemented), we process your personal data such as your name, form of address, telephone and fax number, e-mail address and the language of correspondence. This data is stored by us for at least six months to process the request and in the event of follow-up questions. The same applies if you provide us with your personal data for the purpose of being contacted by us (e.g., by telephone or by handing over a business card).

3.5 Data processed when contacting us
In the event that you enter into a business relationship with us, we collect the following (personal) data:

- Name
- Title
- Business address and other addresses
- Telephone number
- E-mail address
- Profession/Professional title/Job title
- Date of birth
- Registered business number
- Contact persons
- Sector
- Employer
- Order data
- Product preferences
- Internal customer ID
- Language
- Gender
- VAT identification number

In addition, we will assign you an internal customer or supplier number.

Your data will be stored as long as it is necessary for the fulfillment of the contract or the performance of precontractual measures. Insofar as your personal data is processed by our accounting system, as in the case of a contract being concluded, it will be stored until the end of the prescribed period under the statutory obligations of retention. In accordance with the applicable tax regulations, the period is 7 years. For the purposes of product liability, we store selected data (name, address, goods and date) for 10 years.

§ 4 Period of Storage
In principle, we only store your data for as long as it is needed. By default, your data is stored as long as specified in the respective sections. In individual cases, however, a shorter or longer storage period may apply, e.g. due to legal obligations that XAL must comply with.

§ 5 Purposes of Processing
We process the data collected from you primarily for the purpose of fulfilling the contract or to carry out precontractual procedures. Furthermore, we are subject to statutory obligations to process data, e.g., for reasons of applicable tax and commercial law provisions, as well as anti-corruption and anti-money laundering regulations. We process data, such as your name and e-mail address, that you have voluntarily made available to us, on the basis of your consent or based on our legitimate interest for the purpose of customer service, for our own advertising purposes, such as sending out promotional offers, advertising brochures and newsletters (in paper and electronic form), as well as for the purpose of indicating the existing or previous business relationship with the customer (reference notice). The data processing takes place on the basis of the applicable statutory provisions as well as on the basis of your consent and for the purpose of fulfilling the contract.

§ 6 Our Principles in connection with the processing of your personal data
It is important to us that we comply fully with all statutory data protection regulations. Your personal data is processed on the basis of the General Data Protection Regulation (GDPR) and the national laws derived from it. Your personal data is secure with us. Your data will not be sold, loaned or rented by us or passed on to third parties in any manner or form, without your express consent. In certain cases, however, your personal data will be transferred to contract data processors, if they provide sufficient guarantee of lawful and secure use of data and if they are contractually obligated to comply with the principles described in this Data Protection Statement and the statutory regulations. However, we reserve the right to transfer your personal data to another company, as part of business restructuring or company mergers, provided that this company undertakes to comply with our principles in connection with the processing of personal data and has its registered office either within the European Union or in a third country with appropriate data protection. We also reserve the right to pass on your personal data to third parties if we are required to do so by law, a final judgement of the relevant court or an order of the relevant authority. We also reserve the right to pass on your personal data if, as a result of acts or omissions on your part, we are forced to protect or have our rights, property or assets protected by the relevant authorities. We limit our data processing to a necessary and sensible extent. We also explain to you for what purpose we collect and process your data. If your personal data is no longer required for use, it will be deleted.

§ 7 Data Transfer and Order Data Processing
As part of a global group, the branches of our subsidiary companies and our extended group of companies, as well as external service providers, are located both inside and outside of the European Economic Area (EEA). We may also use a contract data processor for processing your data. We pass on your data to the following recipients or recipient categories, e.g.: tax consultants, legal representatives, banks, subcontractors, suppliers, group companies. Some of your data will also be forwarded to countries outside the European Union or the EEA and processed there. This primarily affects the United States of America, India, the People's Re- public of China, the United Arab Emirates and the United Kingdom. The data transfer is based on the order data processing contracts that we have concluded with the corresponding order data processors. If you actively decide to use the social network functions that are offered through our online presence, your personal data will be forwarded to the respective external providers of these social networks.

§ 8 Automated Decision-Making and Profiling
We only use partially automated procedures for data processing if you have given us your consent. This allows us to analyze your interactions with us and other companies in the XAL Group in order to provide you with the most relevant information possible. You can find out which companies belong to the XAL Group here. For example, we analyze which events you have attended and which articles you have viewed in our newsletter (if you are subscribed to the newsletter). This allows us to present you with content that is of particular interest to you. This is called profiling - because the data we combine in this way results in a user profile. You have the option to revoke your consent to profiling for marketing purposes at any time. This can be done by mail, by email or directly on our website. If you do not revoke your consent before, your profile will be deleted no later than two years after your last interaction with us.

§ 9 Cookies
Our website uses cookies to collect personal data as well as standard internet log data and information on the behavioural patterns of end users when visiting our website. When visiting our website, first of all, you can determine your cookie settings. You can decide which categories of cookies you allow. We collect different data from you, depending on which cookies you allow. This is performed in order to offer you a better user experience, to recognize preferences, to diagnose technical problems and to analyze trends as well as to make product recommendations matched to your interests. In addition, most browsers allow you to select whether you wish to allow cookies or not. If you do not want cookies to be stored on your computer, please set your browser preferences before accessing our website so that all cookies are rejected. Please note that this may mean that some functions of our website are not available. Further information on how to check which cookies have been stored and how to manage and delete them, can be found under www.allaboutcookies.org. Cookies are text files that websites store on your computer, or other terminal, for the purpose of logging and improving functionality. Most cookies are known as session cookies and are deleted from your device after the browser session has ended. Other cookies remain stored on your device and enable us to recognize your device on your next visit (referred to as long-term cookies). We also use third-party cookies on our website. You can read more information about which cookies we use and which data they store in our Cookie Policy.

§ 10 Your Rights
You have the following rights in connection with the use of your personal data:

Right of access by the data subject (Art 15 GDPR): You can request information at any time as to whether and which personal data we are using. You also have the right to know what purposes the processing serves, from where the data originates, to which recipients we transmit the data and how long we store this data.

Right to rectification (Art 16 GDPR): If you find that the personal data that we are processing is incorrect, you are entitled to request that this data be corrected at any time. If, in your opinion, data is incomplete, you are entitled to request that this data be corrected.

Right to erasure (Art 17 GDPR): If you are of the opinion that the processing of your personal data is no longer necessary or that there is no (longer) a legal basis for this processing or that, for other reasons, we are processing the data unlawfully, you can request that this data be deleted.

Right to restriction of processing (Art 18 GDPR): If we process your personal data unlawfully, you can also request that the use of this data be restricted as an alternative to deletion. This applies, in particular, if you dispute the accuracy of your data or if an objection has been lodged against data processing.

Right to data portability (Art 20 GDPR): The right to data portability ensures that the personal data we process, on the basis of a contract or consent, is made available to you in a structured, commonly used and machine-readable format. You can also request that we transmit this data directly to a controller.

Right to object (Art 21 GDPR): You can object to data processing if there are reasons, related to your particular situation, that make the use of your data inadmissible. If we use your personal data for direct mailing, you have the right to object.

Right to lodge a complaint with a supervisory authority (Art 77 GDPR): If you believe that your rights in respect of your personal data have been infringed, you have the right to lodge a complaint with the supervisory authority. If you have any questions or points of clarification about your rights, please do not hesitate to contact our data protection officer at the following e-mail address: office.us@xal.com.

§ 11 Protection of Your Data
We take technical and organisational steps to protect your data, in the best possible manner, against loss, destruction, access or modification, as well as distribution, by unauthorized persons. We regularly evaluate these measures and adapt them to progress in technology. It is important for us to emphasize to you that, despite extensive measures, it is not possible for us to guarantee absolute protection of your data.

§ 12 Changes to the Data Protection Regulations
Statutory changes or changes to internal company processes may make it necessary to adapt these data protection provisions, and we accordingly reserve the right to do so. We ask you to read this data protection declaration on a regular basis.