

# Data Privacy Policy for Customers, Suppliers and Business Partners pursuant to Art. 13 GDPR

We treat the protection of your personal data as our top priority and care about protecting your personal data during all business processes. Any personal data disclosed to us will be processed in accordance with the provisions of the EU General Data Protection Regulation (**GDPR**) and the statutory data protection provisions of the German Federal Data Protection Act (**BDSG**).

The following Data Privacy Policy will give you a detailed overview of how we process your personal data and notably contains details on the nature, extent and purpose of the collection of your personal data. Personal data means any information relating to an identified or identifiable natural person (**Data**). In addition, you will be advised of your rights with regard to the processing of your personal data.

Although the masculine form has been chosen in this Policy for ease of reading, the information provided herein nevertheless refers to members of all genders.

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## 1. Scope of application of this Data Privacy Policy

### 1.1. Our Policy

This Data Privacy Policy applies to all prospective customers, contracting parties and business partners of our organization and to any other persons coming into contact with our organization's services or associated activities. In the following, only the term **Contractual Partners** will be used consistently throughout this Policy for ease of reading.

### 1.2. Additional special regulations applicable for special services

We may invoke supplementary Data Privacy Policies for certain services or products offered by our organization which apply in addition to this Data Privacy Policy. Such supplementary Data Privacy Policies apply, for example, to the video surveillance used in certain areas of our company premises, or to the use of certain products, or for visits to our websites. Please feel free to peruse the relevant data protection information on our website at any time.

## 2. Contact details of the Data Controllers and the Data Protection Officers

### 2.1. Data Controller's Name and Address

The Data Controller responsible in accordance with the GDPR and other national data protection laws of the Member States as well as other provisions of data privacy law is:

#### Sortimo International GmbH

Dreilindenstr. 5  
86441 Zusmarshausen  
+49 8291 850 0  
info@sortimo.de  
www.mysortimo.de

### 2.2. Shared accountability within the Sortimo Group of Companies (Art. 26 GDPR)

Sortimo International GmbH is the leading manufacturer of flexible and intelligent vehicle equipment systems. Working in partnerships based on mutual trust and confidence, Sortimo International GmbH in collaboration with its subsidiaries offers optimized logistics solutions tailored to the needs of each customer. Any personal data of contractual partners transferred and/or processed between Sortimo International GmbH and its subsidiaries are transferred and/or processed subject to all group companies' shared accountability. The following group companies share responsibility for any data transferring and/or processing:

**Sortimo International GmbH**, Dreilindenstr. 5, D-86441 Zusmarshausen

**Sortimo Speedwave GmbH**, Dreilindenstr. 5, D-86441 Zusmarshausen

**Sortimo Services & Technology GmbH**, Dreilindenstr. 5, D-86441 Zusmarshausen

**Sortimo by GRUAU SAS**, 1, rue Jean Mermoz, F-95500 Gonesse

**Sortimo International Ltd.**, 11 - 17 Ravenhurst Court, Birchwood, Warrington, Cheshire, GB-WA3 6PN

**Sortimo Ges.m.b.H.**, Wiener Str. 131, A-4020 Linz

**Sortimo BV**, Schaarbeeklei 491, BE-1800 Vilvoorde

**Sortimo A/S**, Greve Main 24, DK-2670 GREVE

**Sortimo A/S**, Ulvenveien 92 A, N-0581 OSLO

**Sortimo AB**, Argongatan 9, SE-43153 Mölndal

**Sortimo Iberica Comercio Y Servicios S.L.**, P.I. Gana2, Nave 29, Ctra M-106, km 2, ES-28110 Algete

**Sortimo Nederland B.V.**, Nijverheidstraal 11, NL-2861 GX Bergambacht

**BS Systems GmbH & Co. KG**, Am Innovationspark 2, D-86441 Zusmarshausen

**FISCO GmbH**, Dreilindenstr. 5, D-86441 Zusmarshausen

As part of their shared data processing responsibility, the companies have made an intra-group arrangement sharing the various data privacy tasks under the GDPR to safely protect your data. This arrangement notably tells you which group company is responsible for protecting your rights under the GDPR. To find out more about your rights and whom to address when exercising these rights, please refer to **Clause 9**. However, we undertake to mutually notify each other without delay of any legal claims you may have asserted and to provide each other with all information necessary to respond to requests for information so as to safely protect you from any disadvantages potentially arising from the shared processing of your data.

### 2.3. Data Protection Officer's name and address

Our organization has appointed a Data Protection Officer. Please use the following contact details to contact our Data Protection Officer:

Mr. Maximilian Hartung | SECUWING GmbH & Co. KG KG | Datenschutz Agentur

Frauentorstraße 9 | 86152 Augsburg

Telephone: +49 821 90786450

Email address: [epost@datenschutz-agentur.de](mailto:epost@datenschutz-agentur.de)

## 3. General information on the provisions of law governing the processing of your personal data

### 3.1. General provisions of law

The processing of personal data is permitted only if done according to the provisions of law. The following provisions of law may be considered for this purpose:

- Whenever your prior consent is obtained for processing personal data, the relevant provision of law is Art. 6 (1), 1st sentence, subparagraph (a), Art. 7 of the General Data Protection Regulation (GDPR).
- Whenever processing personal data that is necessary for the performance of a contract to which you are a party, the relevant provision of law is Art. 6 (1), 1st sentence, subparagraph (b) of the General Data Protection Regulation (GDPR). The same applies to processing operations that are necessary for pre-contractual actions to be carried taken in response to your request.
- If the processing of personal data is necessary to fulfill a legal obligation mandatory for our organization, the relevant provision of law is Art. 6 (1), 1st sentence, subparagraph (c) of the General Data Protection Regulation (GDPR).

- In the event that vital interests of the data subject or another natural person require the processing of personal data, the relevant provision of law is Art. 6 (1), 1st sentence, subparagraph (d) of the General Data Protection Regulation (GDPR).
- Whenever the processing of personal data is necessary for the performance of a task carried out in the public interest or subject to the exercise of public authority vested in us, the relevant provision of law is Art. 6 (1), 1st sentence, subparagraph (e) of the General Data Protection Regulation (GDPR).
- If the processing of personal data is necessary to protect the legitimate interests held by our organization or by a third party or to protect your own legitimate interests, and provided your interests, fundamental rights and fundamental freedoms do not override the first-mentioned interests, the relevant provision of law is Art. 6 (1), 1st sentence, subparagraph (f) of the General Data Protection Regulation (GDPR).

### 3.2. Special provisions of law governing the processing of special categories of personal data pursuant to Art. 9 GDPR

The processing of **special categories of personal data (Art. 9(1) GDPR)** 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 uniquely identifying a natural person, health data, or data concerning a natural person's sex life or sexual orientation, is generally prohibited.

If governed by appropriate provisions of law, such special categories of personal data may also be processed in exceptional cases. The following provisions of law may be considered for this purpose:

- If you have expressly consented to the processing for one or more specified purposes, your consent will serve as the legal basis for such processing (Art. 9 (2) subparagraph (a) of the General Data Protection Regulation (GDPR)).
- In the event that you have obviously made your relevant data public, the relevant provision of law is Art. 9 (2) subparagraph (e) of the General Data Protection Regulation (GDPR).
- If the processing of personal data is necessary for the establishment, exercise, or defense of legal claims, the processing of such data shall be permissible pursuant to Art. 9 (2) subparagraph (f) of the General Data Protection Regulation (GDPR).

In the following, special categories of personal data are highlighted in **bold**.

### 3.3. Objection against and revocation of the declaration of consent to the processing of personal data

If you have given your consent to the processing of your data, you may revoke this consent at any time. Please note that such a revocation will only affect the permissibility of the processing of the personal data from the time at which the revocation was made.

If the processing of personal data is based on a balance of interests, you have the right to object to the processing. When exercising such an objection, please tell us the reasons why you do not want your personal data to be processed in the manner they were being processed. In case of a justified objection, we will examine the merits of the case and either discontinue or adjust the processing of your data or advise you of the compelling legitimate grounds for which the processing of your data will continue.

### 3.4. Data erasure and storage duration

Your personal data will be deleted or blocked as soon as the purpose of storage no longer applies. Blocking means the cancellation of any references of the data to your person. Storage may also take place if the European or national legislator has provided for such storage in Union regulations, laws or other provisions to which we as the data controller are subject. The data will also be blocked or deleted if a storage period prescribed by the aforementioned standards expires, unless such storage is necessary for further storage of the data for the conclusion or performance of a contract.

## 4. Processing of your personal data

### 4.1. Description and scope of data processing

If you or the company you are working for (or would like to work for) enter into a contractual relationship with us, we will collect and process your personal data within the scope of the contractual relationship to be established or then existing. Normally, we will collect your data only if and to the extent you are working for a company wishing to enter into or already engaged in a contractual relationship with us. This means that the point of reference for our data collection is the company wishing to enter into or engaging in a contractual relationship with us, as outlined below. This means that we will normally only collect your personal data to the extent such data are generated or transmitted as a result of your work for one of our contractual partners. This may include notably the following categories of personal data:

- Master data and professional contact data: in particular the title, first name, last name, address, telephone numbers, e-mail addresses, other contact data, if applicable, function and industry affiliation and, if you are named as a company's representative or point of contact, data on the nature of your representation and your relationship/employment relationship with the company you are working for (i.e., company, division, department, responsibility, function);
- contract data, in particular data on contractual contents, contract identifiers and contract history, persons concluding the contract, start and end of contract, contract processing/transaction processing;
- where applicable, data contained in your identity card, driver's license or other identification documents presented, as well as other authentication data;
- banking information;
- Where applicable, data on payment history and general contractual behavior;
- data from postal, electronic and telephone communication between yourself and us and between yourself and third parties;

- data on business activities and any third-party business partners;
- where applicable, interests of our contractual partner(s) and the authorized representative(s) and point(s) of contact for marketing activities, in particular invitations to events and other information of a promotional nature;
- where applicable, other data related to the establishment and implementation of the contractual relationship.

### 4.2. Where does the data originate?

Our organization normally collects your personal data directly from you, even if you work for a company that is our contractual partner. In addition, we also receive some of your data from our subsidiaries and sub-subsidiaries of the Sortimo Group.

In addition, we may collect your data from publicly available sources, such as the websites of the company you work for, or from professional networks, or through third-party business contacts, e.g. following a referral.

### 4.3. Purposes and legal basis of data processing

Our organization collects and processes your data for various purposes, but principally for the purpose of establishing and implementing the contractual relationship existing with yourself or the company you work for: In detail:

#### Purposes:

- Initiating a contractual relationship and taking pre-contractual actions or Fulfilling contractual/legal primary and secondary performance obligations arising from a contractual relationship with yourself or the company you work for;
- Invoicing, dunning and debt collection, accounting, and tax assessment of operating performance;
- Identity checking;
- Correspondence in response to purchase orders using state-of-the-art means of telecommunication, either with yourself or with third parties via yourself;
- Customer support.

**Legal basis: Contract performance** (Art. 6 (1), 1st sentence, subparagraph (b) GDPR) if you are our direct contractual partner, as well as **balancing of interests** (Art. 6 (1), 1st sentence, subparagraph (f) GDPR) if you are not a our direct contractual partner but are working for a company that is (possibly) our contractual partner or (possibly) the contractual partner of a company of the Sortimo group of companies; it is our understanding that the legitimate interests of our organization to store your personal data in your capacity as the point of contact for the company you work for do outweigh your interests. We do have a legitimate interest in processing the concerns and inquiries submitted by you, in achieving the best possible customer results, and in verifying your identity.

As a rule, the processing of personal data is necessary for the fulfillment of contractual and legal obligations arising from the contractual relationships initiated or concluded with our customers. In view of your duties to cooperate, it is essential to provide the personal data requested by us as we will otherwise be unable to fulfill our contractual and legal obligations. Disadvantages in

the initiation or implementation of contractual relationships cannot be ruled out if the data is not provided.

#### Purposes:

- Fulfillment of obligations under public law, such as monitoring and reporting obligations under tax law, archiving of data within the scope of existing statutory retention obligations;
- Identity checking, prevention of fraud and money laundering, prevention of, fighting against, and investigation of terrorist financing and crimes endangering assets, cross-checking with European and international anti-terrorist lists;
- Disclosure of data in the context of official/judicial measures for the purposes of gathering evidence, criminal prosecution and enforcement of civil claims.

**Legal basis: Fulfillment of legal obligations** (Art. 6 (1), 1st sentence, subparagraph (c) GDPR) or **balancing of interests** (Art. 6 (1), 1st sentence, subparagraph (f) GDPR) as we have a legitimate interest in complying with international and national sanctions lists, in documenting and proving compliance with legal and contractual obligations and requirements, and in asserting, exercising or defending legal claims.

#### Purposes:

- Establishment and maintenance of our IT environment;
- Cooperation with other affiliates of the group of companies to which our company belongs;
- Measures to protect our employees and customers and measures to protect our organization's assets;
- Video surveillance to safeguard our right to keep out trespassers in specially marked areas and to investigate criminal acts, to safeguard our rights and those of our employees, guests, customers, etc.;
- Safety, quality, behavioral and performance checks as well as workflow analyses for controlling operations and improving of processes (e.g., analyses of the number of work reports or the time spent on services for customers), it being understood that these analyses may also be performed jointly with other affiliated companies;
- Measures for the control and optimization of business processes and for the fulfillment of general due diligence obligations, further statistical analyses for corporate management, cost recording and controlling, it being understood that these analyses may also be performed jointly with other affiliated companies;
- Enforcement of legal claims and defense of legal claims and legal disputes, and the storage of any until the expiry of limitation periods to reserve appropriate processing.

**Legal basis: Balancing of interests** (Art. 6 (1), 1st sentence, subparagraph (f) GDPR) as we have a legitimate interest in improving our business processes (as required by business and law) and improving our customer services, and in pursuing, exercising or defending our legal claims.

#### Purposes:

- Customer surveys, preparation and mailing of personalized customer information as well as direct advertising, e.g. via a newsletter.

**Legal basis: Consent** (Art. 6 (1), 1st sentence, subparagraph (a) GDPR) or **Balancing of interests** (Art. 6 (1), 1st sentence, subparagraph (f) GDPR) as we take an interest in promoting our products to yourself and in improving our services and offerings.

#### 4.4. Processing of your data under shared responsibility

##### Purposes (in particular):

- Support by Sortimo International GmbH in the processing of personal data, specifically for activities including finance and accounting, quality management, information and telecommunication technologies as well as hardware procurement and implementation, data protection and IT security, marketing, sales and e-commerce, as well as motor pool management;
- Processing of contractual partners' data for administration and billing purposes within a shared IT system featuring appropriate access authorization concepts;
- Processing of contractual partners' data for the purposes of task management, document processing, customer communication, and project planning and processing within a shared IT system featuring appropriate access authorization concepts.

**Legal basis: Balancing of interests** (Art. 6 (1), 1st sentence, subparagraph (f) GDPR) since, due to the close intercompany relationships within our group, we have an interest in the comprehensive and joint administration and storage of your data to the extent and for the purposes stated above, it being our understanding that this interest is not overridden by your fundamental rights and freedoms which require the protection of your data. For this purpose, access to your personal data will be limited to the extent necessary to achieve legitimate processing purposes and is restricted by technical and organizational measures.

#### 5. Disclosure of your data to third parties

##### 5.1. Sharing your data within our organization

Within our companies, access to your data will be granted only to those departments that need it in order to fulfill contractual, legal and supervisory obligations and to safeguard legitimate interests.

##### 5.2. Sharing your data within our group of companies to affiliated companies

As outlined above, we may - especially as per of our shared accountability - disclose your data to other companies of the group to which our organization belongs, to the extent such disclosure is necessary for the data processing in the individual case or to the extent we have a legitimate interest in doing so (Art. 6 (1), 1st sentence, subparagraph (f) GDPR).



### 5.3. Disclosure of your data to Processors

We may also disclose personal data for the aforementioned purposes to service providers commissioned by us and working on our behalf (so-called **Processors**). We use Processors as providers of specific services to support us in the execution of our business processes who are working in accordance with precise instructions from our organization as well as this Data Privacy Policy and other appropriate confidentiality and security precautions.

### 5.4. Disclosure of your data to other external third parties

Regarding the transfer of data to recipients outside our companies, please note first of all that as an employer we only pass on strictly necessary personal data, in compliance with the applicable data protection regulations. As a general rule, we will only pass on information about our contractual partners or their points of contact whenever this is required by law, or after you have given your consent, or if we are otherwise authorized to pass on such information. With these prerequisites in mind, recipients of personal data may typically include, for example:

- Tax authorities or other authorities and public bodies;
- Other companies commissioned for the processing of contractual relationships or comparable institutions to which we transfer data for the purpose of implementing the contractual relationship, e.g., credit agencies and debt collection companies;
- Consultants such as auditors and payroll tax auditors, legal advisors (lawyers), and courts of law.

Other data recipients may include entities for whom you have given us your transfer data consent or whom we are authorized to transfer personal data to based on a balancing of interests.

## 6. Transfer to a third country or an international organization

### 6.1. Our Policy

Subject to the following explanatory notes, the personal data provided by you will not be transferred to a third country or an international organization. Personal data may not be transferred to a third country unless the special requirements of Art. 44 et seq. GDPR are met. Should you wish, in the individual case, for the data you have provided to be transferred to a third country or to an international organization, or if such transfer is necessary notably for the purpose of implementing our contractual relationship, we will only proceed with such transfer if the requirements of Art. 44 et seq. GDPR are met.

### 6.2. Integration of the Microsoft 365 services

#### 6.2.1. Description and scope of data processing

We are using Microsoft 365 services, i.e., office and cloud services provided by the Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, U.S.A. (hereinafter: **"Microsoft"**). In the course of using Microsoft's services, personal data is also processed and stored. As per the contract with Microsoft, this information is generally only processed within the EU or the EEA. Nevertheless, the transfer of data outside the EU cannot be ruled out. We have no influence on this data transmission. The use of Microsoft 365 services is indispensable for the establishment and

implementation of our contractual relationship and for ensuring that our contents and services are functioning and being provided in full.

#### 6.2.2. Transfer of personal data to a third country (U.S.A.)

To the extent that data is transferred between the U.S.A. and the EU in exceptional cases, which transfer is beyond our control, please note that there is no currently existing adequacy decision for the U.S.A. pursuant to Art. 45 of the GDPR to certify an adequate level of data protection for the U.S.A. It is therefore necessary to have other suitable guarantees in place to ensure guaranteed adequate data protection in the U.S.A. Although Microsoft has submitted to some standard contractual clauses of the European Commission (Art. 46 (2) subparagraph (c) GDPR), U.S. companies are nevertheless obliged to disclose personal data to security authorities without you, as the data subject, being able to take legal action against such disclosure. It therefore cannot be ruled out that U.S. authorities (e.g., intelligence services) may process, analyze, or permanently store your data located on U.S. servers for surveillance purposes. We have no influence on these processing activities. You may also find it impossible to pursue or enforce your disclosure rights or other data subject rights against Microsoft in the long term. Besides, the technical and organizational remedies used by Microsoft for the protection of personal data may not fully comply with the GDPR requirements, in terms of both quality and quantity. It is therefore possible that the European Commission's standard contractual clauses as applied by Microsoft do not constitute sufficient guarantees as defined by Art. 46 (2) subparagraph (a) GDPR. According to the document available at

<https://www.microsoftvolume licensing.com/Downloader.aspx?DocumentId=18986>

Microsoft has nevertheless committed to only handing over data to U.S. security authorities if Microsoft has in fact been legally ordered to do so by a government order. Microsoft is also required to take legal action to challenge the government order for surrender of the data. Moreover, Microsoft will generally indemnify a data subject against any material or non-material damage suffered by the data subject as a result of Microsoft's disclosure of the data subject's personal data transferred pursuant to the Standard Contractual Clauses in response to a request from a non-EU/EEA governmental body or law enforcement authority.

Further information on the purpose and scope of data collection and processing as well as further information on your related rights and setting options to protect your privacy are available at:

<https://docs.microsoft.com/de-de/legal/gdpr>

and at

<https://www.microsoftvolume licensing.com/Downloader.aspx?DocumentId=18986>

### 6.3. Sharing your data within our group of companies

As outlined in Clause 5.2 above, your data may be passed on to other companies in the group of companies (see Clause 2.2) to which our organization belongs, to the extent such transfer is necessary for the purposes of data processing in the individual case or to the extent we have a legitimate interest in doing so.

### 6.3.1. Transfer of your data to the United Kingdom and Norway

In the context described above, your data may be transmitted to our group companies domiciled in the United Kingdom or Norway. Norway is part of the EEA, which is why the GDPR applies directly. For the United Kingdom, there is an adequacy decision in existence pursuant to Art. 45 of the GDPR, according to which the European Commission has determined that the United Kingdom offers an adequate level of data protection in relation to the EU. A list of these countries and a copy of the adequacy decisions is available at:

[http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index\\_en.html](http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.html)

### 6.3.2. Transfer of your data to the U.S.A.

In the context described above, your data may be transmitted to our group companies in the U.S.A. Please note that there is no currently existing adequacy decision for the U.S.A. pursuant to Art. 45 of the GDPR to certify an adequate level of data protection for the U.S.A. It is therefore necessary to have other suitable guarantees in place to ensure guaranteed adequate data protection in the U.S.A. Along with our group companies domiciled in the U.S.A., we have submitted to standard contractual clauses (Art. 46 (2) subparagraph (c) GDPR) of the European Commission, although U.S. companies are nevertheless obliged to disclose personal data to security authorities without you, as the data subject, being able to take legal action against such disclosure. Prior to each transfer of personal data to the U.S.A., we are therefore limiting the transfer to the absolute minimum required (e.g., for the performance of contracts) and are using encryption and anonymization wherever possible. Nevertheless, it cannot be ruled out in individual cases that U.S. authorities (e.g., intelligence services) may process, evaluate and permanently store the data for monitoring purposes. Neither we nor our group companies have any influence whatsoever on these processing activities. It is therefore possible that the European Commission's standard contractual clauses as applied in the U.S.A. do not constitute sufficient guarantees as defined by Art. 46 (2) subparagraph (a) GDPR.

## 7. Duration of storage; Right to objection and erasure

Our organization undertakes to process and store your data only for as long as absolutely necessary, notably for the fulfillment of contractual or legal obligations. Once there is no longer a legal basis for processing your data, our organization will delete the data or, where this is not possible, block any personal references to you in accordance with data protection laws. Please note that even if you have revoked your consent, we may nevertheless be obliged or entitled under different provisions of law to continue the retention of your data (or parts thereof). What this means for the purposes hereof is that our organization retains your data in accordance with the **statutory retention obligations**, as follows:

- Our organization stores your data to the extent necessary for this purpose, as long as data storage is required for the implementation of an existing or yet to be initiated contractual relationship with you or the company you are work for (but at any rate only for as long as you work for this company).
- Our organization stores your data to the extent required for this purpose so as to comply with the retention obligations under commercial and/or tax laws governing our

organization. The retention period prescribed by commercial and/or tax law is ten (10) years for all documents required for the determination of profits in accordance with the statutory provisions; the retention period for business letters (including e-mails) is six (6) years; this means that we may also retain your personal data contained in your correspondence with our organization. The legislative basis in this case is Art. 6 (1), 1st sentence, subparagraph (c) GDPR;

- According to the provisions of the German Civil Code (BGB), statutes of limitation may be up to thirty (30) years, with the regular statute of limitations being three (3) years. It is for this reason that our organization retains the contract documents as well as any documents associated with the contract in accordance with said statutes of limitation so as to be able to bring legal action as may be necessary.

## 8. Automated decision-making in individual cases including profiling

Our organization does not use any fully automated decision-making procedures (including profiling) pursuant to Art. 22 GDPR for processing the personal data provided by you. Should we decide use these procedures in individual cases, we will notify you separately and advise you of your rights in this regard, insofar as this is required by the law. In particular, we do not process your data with the aim of automatically analyzing certain personal aspects.

## 9. Your rights

If personal data concerning you is being processed, you are considered a data subject as defined by the General Data Protection Regulation (GDPR), and you are entitled to the following rights against the data controller. As outlined above, the processing of your data in any individual processing operations will be subject to shared accountability between our organization and other companies in our group. As part of our agreement concluded on our shared accountability between the companies concerned, it was decided that our organization is also in charge of the centralized management of the data subject rights for the other responsible (subsidiary) companies. To exercise your rights, you may also wish to contact any of the responsible controller companies mentioned in **Clause 2.2**. In any case, your request will be forwarded to the responsible controller and duly processed.

As a data subject, you have the following rights:

- The data subject has the right to obtain confirmation from the controller as to whether personal data concerning him or her are being processed. If this is the case, the data subject has a **right of access** to this personal data and to the information detailed in Art. 15 GDPR.
- The data subject has the right to immediate **rectification** of inaccurate personal data concerning him or her by the controller and, where applicable, the right to completion of incomplete personal data (Art. 16 GDPR).
- The data subject has the right to request the controller to promptly **delete** personal data concerning him or her, provided that one of the reasons detailed in Art. 17 GDPR applies, e.g., if the data is no longer needed for the purposes pursued (right to erasure).
- The data subject has the right to request the controller to **restrict processing** for the duration of the controller's

review if one of the conditions listed in Art. 18 GDPR applies, e.g., if the data subject has objected to the processing.

- The data subject has the right to **object** to the processing of personal data concerning him or her at any time, on grounds relating to his or her particular situation. The controller shall then no longer process the personal data unless it can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defense of legal claims (Article 21 GDPR).
- Without prejudice to any other administrative or judicial remedy, every data subject shall have the **right to lodge a complaint with a supervisory authority** if the data subject feels that the processing of personal data relating to him or her infringes the GDPR (Art. 77 GDPR). The data subject may exercise this right before a supervisory authority in the Member State of his or her residence, or place of work, or the place of the alleged infringement.

The competent supervisory authority in Bavaria is the

**Bayerisches Landesamt für Datenschutzaufsicht  
(Bavarian State Office for Data Protection Supervision)**

Mail-in address: Postfach 1349 | 91504 Ansbach

Telephone: +49 981 180093-0

Facsimile: +49 981 180093-800

Email: [poststelle@lda.bayern.de](mailto:poststelle@lda.bayern.de)

The data subject may also exercise this right before a supervisory authority in the Member State of his or her residence, or place of work, or the place of the alleged infringement.

**Status: September 2021**