# **Data Protection Declaration**

## Liebherr SmartMonitoring

We, Liebherr-Hausgeräte GmbH, are pleased that you are visiting our SmartMonitoring portal (hereinafter also referred to collectively as "portal") and that you have thereby expressed an interest in the Liebherr Group.

We attach great importance to the protection and security of your personal data. Therefore, we consider it vital to inform you in the following about which of your personal data we process for what purpose and what rights you have in respect of your personal data.

Liebherr SmartMonitoring is a digital, cloud-based service that enables the record and the visualisation of temperatures, alarm statuses as well as the switching status of components of one or more professional refrigerators and freezers in a browser-based application.

Furthermore, the services can record and display measured variables using external sensors, which the user can purchase as accessories in various versions.

In order to use Liebherr SmartMonitoring, a user needs a network module (SmartCoolingHub or SmartModule) and associated accessories, such as cables, RS485 plugs and RS485 adapters for connecting the refrigerators and/or freezers. The user also needs a valid user licence and an active Liebherr account for commercial users. Permanent Internet access is required too.

## **General information**

#### What is personal data and what does processing mean?

- "Personal data" (hereinafter also referred to as "data") are all the details that make a statement about a natural person.
   Personal data are not just details that allow a direct conclusion to be drawn about a certain person (such as the name or e-mail address of a person), but also information with which with suitable additional knowledge a connection can be made with a certain person.
- "Processing" means any action taken with your personal data (such as collection, recording, organisation, structuring, storage, use or erasure of data).

#### Who is the controller for the processing of your data?

The controller for the processing of your data is:

Liebherr-Hausgeräte GmbH Memminger Straße 77-79 88416 Ochsenhausen Germany Phone: +49 7352 928-0 E-Mail: privacy.appliances@liebherr.com

#### How can you reach our data protection officer?

Our data protection officer can be reached at the following contact details:

#### **Corporate Privacy**

Liebherr-IT Services GmbH St. Vitus 1 88457 Kirchdorf an der Iller Germany E-mail: datenschutz@liebherr.com

#### What rights do you have as a data subject?

As a data subject, you have the right, within the legal scope, to:

- Information about your data;
- Rectification of inaccurate data and completion of incomplete data;
- Erasure of your data, particularly if (1) they are no longer necessary for the purposes stated in this Data Protection Declaration, (2) you have withdrawn your consent and there is no other legal ground for the processing, (3) your data have been unlawfully processed, or (4) you have objected to the processing and there are no overriding legitimate grounds for the processing;
- Restriction of the processing of your data, particularly if the accuracy of the data is contested by you or the processing
  of your data is unlawful and instead of deletion you demand restriction of use;
- Object to processing of your data based on legitimate interests, on grounds relating to your particular situation, or, without specific justification, to processing of your data carried out for direct marketing purposes; unless it is an objection to direct marketing, we ask that you explain the reasons why we should not process your data as we may do, when you lodge an objection. In the event of your reasoned objection, we will examine the merits of the case and cease processing unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims;
- Receive your data in a structured, commonly used and machine-readable format and to have your data transmitted from
  us directly to another controller;
- Withdraw consent, if you have given us consent for processing. Please note that the lawfulness of processing based on consent before its withdrawal will not be affected by your withdrawal.

If you assert any of the above-stated rights, please understand that we may require you to provide evidence showing that you are the person you claim to be.

Furthermore, you have the right to lodge a complaint with a supervisory authority if you consider that the processing of your data infringes the GDPR.

#### Links to other websites

Our website may contain links to and from websites of other providers not affiliated with us ("third parties"). After clicking on the link, we no longer have any influence on the processing of any data transmitted to the third party when the link is clicked (such as the IP address or the URL on which the link is located), as the behaviour of third parties is naturally beyond our control. Therefore, we cannot assume any responsibility for the processing of such data by third parties.

### **Data processing**

#### Log files

Each time you access and use our portal, the web browser used on your terminal equipment (computer, smartphone or similar) automatically sends information to our web servers, which we store in so-called log files.

The backend also saves log files to ensure smooth functionality of the software system (e.g. for error diagnostics).

#### What data do we process and for what purposes?

We process the following data:

- Your (external) IP address
- User Principal Name (UPN)
- Date and time of access, type of access
- The type and version of browser you are using and the operating system you are using
- URL (address on the internet) of the web page you were on at the time of the access
- The actions you perform on the respective portal page (e.g. clicking a button)
- Calls to backend services (tracing)



These data are in principle processed by us solely for the purpose of ensuring stability as well as network and information security.

Processing for other purposes may only be considered if the necessary legal requirements pursuant to Article 6 para. 4 GDPR are met. In that case, we will of course comply with any information obligations pursuant to Article 13 para. 3 GDPR and Article 14 para. 4 GDPR.

#### On what legal basis do we process your data?

The processing of your data is carried out for purposes of legitimate interests pursuant to Article 6 para. 1 point f GDPR.

Our legitimate interests pursued are the improvement and maintenance of the stability or functionality and the security of our portal.

You have the right to object, on grounds relating to your particular situation, at any time to processing based on Article 6 para. 1 point f GDPR.

#### Authentication/Authorisation

Authentication for Liebherr SmartMonitoring takes place using an existing Liebherr business account for commercial users at Liebherr-IT Services GmbH, St. Vitus 1, 88457 Kirchdorf an der Iller, Germany.

#### What data do we process and for what purposes?

We process the following data:

- User Principal Name (UPN)
- Company address
- Company-ID
- Name and surname
- E-Mail
- Phone number

Note: This data is transmitted to us by Liebherr-IT Services GmbH when you authenticate with a Liebherr account.

These data are in principle processed by us solely for the purpose of authentication on our portal or central authentication in the context of the use of non-publicly available content.

Processing for other purposes may only be considered if the necessary legal requirements pursuant to Article 6 para. 4 GDPR are met. In that case, we will of course comply with any information obligations pursuant to Article 13 para. 3 GDPR and Article 14 para. 4 GDPR.

#### On what legal basis do we process your data?

The processing of your data is carried out for the performance of a contract or in order to take steps prior to entering into a contract pursuant to Article 6 para. 1 point b GDPR.

#### **Onboarding and service usage**

After onboarding your device and while using the infrastructure, we process particular data.

#### What data do we process and for what purposes?

We process the following data:

 Appliance data of the refrigerators and freezers, of the integrated and external sensors, of the SmartCoolingHubs or SmartModules (e.g. model, serial number, article number and telemetry data such as temperature, door opening status)

Network data (such as Mac and IP address of the SmartCoolingHub or SmartModule, (W)LAN status).
 This data is permanently transmitted from the appliances via the SmartCoolingHub and SmartModules to our portal.

These data are in principle processed by us solely for the following purposes:

- User and authorisation management in the portal
- Service provision and data supply
- Communication with the user, information about new functions / system malfunctions

Note: The data for the external sensors of the service provider Testo Solutions GmbH, Celsiusstr. 2, 79822 Titisee-Neustadt, Germany (hereafter also referred to as "Testo") is being managed by the cloud infrastructure provided by Testo. Certain Testo data is being transmitted to us via the Testo cloud, for example Testo logger serial number, Testo logger article number, logger telemetry data. For user management, only an anonymised customer ID of the user is being transmitted to Testo via the cloud; this means that Testo cannot identify the individual users of our portal, as this is data without any personal reference.

Processing for other purposes may only be considered if the necessary legal requirements pursuant to Article 6 para. 4 GDPR are met. In that case, we will of course comply with any information obligations pursuant to Article 13 para. 3 GDPR and Article 14 para. 4 GDPR.

#### On what legal basis do we process your data?

The processing of your data is carried out for the performance of a contract or in order to take steps prior to entering into a contract pursuant to Article 6 para. 1 point b GDPR.

#### **Processing of service requests**

In case you make a service request in our portal, we will process further data related to you.

#### What data do we process and for what purposes?

We process the following data:

- Error codes or messages from the appliances or services
- Additional telephone numbers for processing service cases
- Additional company addresses for the relevant appliance locations
- Appliance names (alias designations)
- Customer-specific appliance data (e.g. inventory number, order date)
- Customer comments (e.g. for service requests)

These data are in principle processed by us solely for the following purposes:

- Processing the service request, including technical error analysis
- Carrying out customer satisfaction surveys.

Processing for other purposes may only be considered if the necessary legal requirements pursuant to Article 6 para. 4 GDPR are met. In that case, we will of course comply with any information obligations pursuant to Article 13 para. 3 GDPR and Article 14 para. 4 GDPR.

#### On what legal basis do we process your data?

The processing of your data is based on the following legal ground(s):

- Performance of a contract or in order to take steps prior to entering into a contract (Article 6 para. 1 point b GDPR)
- Legitimate interests (Article 6 para. 1 point f GDPR)

Our legitimate interests pursued are improvement of stability and functionality, portal security and appropriate reply to your service request.

You have the right to object, on grounds relating to your particular situation, at any time to processing based on Article 6 para. 1 point f GDPR.

#### **Processing of notifications**

We process certain data as part of the provision of our notification function and the transmission of digital reports.

#### What data do we process and for what purposes?

Within e-mail notifications and transmission of reports we process the following data:

- User Principal Name (UPN)
- Company ID
- Email address of the recipient
- Metadata related to the messages
- Message content
- Company address
- Links to the reports

Within text message notifications and calls and we process the following data:

- User Principal Name (UPN)
- Company ID
- Telephone number of the recipient
- Metadata related to the messages
- Text message content, resp. call notification content

These data are in principle processed by us solely for the following purposes:

- Delivery of notifications
- Transmission of digital reports

Processing for other purposes may only be considered if the necessary legal requirements pursuant to Article 6 para. 4 GDPR are met. In that case, we will of course comply with any information obligations pursuant to Article 13 para. 3 GDPR and Article 14 para. 4 GDPR.

#### On what legal basis do we process your data?

The processing of your data is carried out for the performance of a contract or in order to take steps prior to entering into a contract pursuant to Article 6 para. 1 point b GDPR.

### Use of cookies and other technologies

#### A. General

In providing our portal, we use cookies and other technologies. In the following cookie notices we provide you – as a user of our portal – with additional information on data processing via the use of cookies and other technologies.

#### I. What are cookies and other technologies?

**Cookies** are small text files that a web server can store and read on your terminal equipment (computer, smartphone or similar) by means of the web browser that you use. Cookies contain individual, alphanumeric character strings that enable identification of the web browser that you are using and may also contain information on user-specific settings.

In addition to cookies, we use other technologies as follows:

Using so-called "local storage technology", data is only stored locally, i.e. solely on your terminal equipment and not on the web server, in the so-called "local storage" of your web browser. In contrast to cookies, data stored using local storage technology does not possess an expiry date and is not automatically deleted without further action; you can, however, delete this data yourself via your web browser. Please refer to the instructions of your web browser manufacturer on how to delete data stored using local storage technology.



In addition, we have integrated so-called "tracking pixels" (also called "pixels", "pixel tags" or "web beacons") on our portal. Tracking pixels are small, usually invisible, image files that are automatically loaded by a web server and can provide information about your web browser or terminal equipment as well as your use of our portal. This information can in turn be used to create a profile that is recognised when you visit our portal again.

The aforementioned cookies and other technologies are hereinafter collectively referred to as "cookies".

#### II. What types of cookies and other technologies exist?

We distinguish between essential cookies on the one hand and optional cookies on the other:

- Essential cookies are those that are technically necessary for the functionality as well as for ensuring the security and stability of our portal and information technology systems. We also assign to this category those cookies that store certain settings that you have made, options selected or information entered until you close your web browser (at the latest), in order to provide the desired function that you have requested (e.g. login status, language setting etc.). Your consent is not required to store or read essential cookies. You cannot, therefore, manage essential cookies via the settings of the consent management service that we use, but only via your web browser and delete cookies stored there or block storage of cookies.
- Optional Cookies are those that are not essential for functionality nor to ensure the security and stability of our portal and information technology systems, but are used for analysis or marketing purposes. These cookies can, for example, be used to compile anonymous statistics and collect information on how you use our portal, which enables us to analyse the use of our portal and thereby optimise it. We also assign to this category those cookies that store certain settings that you have made, options selected or information entered; these remain after you have closed your web browser in order to provide the desired function that you have requested (e.g. login status by selecting "Remember my e-mail address", wish list, compare list etc.) over a longer term. To store or read optional cookies, your prior consent is generally required. You can consent to the use of optional cookies and withdraw any consent that you have granted at any time with future effect via the settings of the consent management service that we use.

Both essential and optional cookies may be so-called "session cookies" or "persistent cookies", which differ in their intended lifetime or functional life:

- Session cookies are stored on your terminal equipment and are automatically deleted when you close your web browser.
- **Persistent cookies** (or permanent cookies) are stored on your terminal equipment and are not automatically deleted when you close your web browser, but remain on your terminal equipment for a predefined period of time.
- Data stored using local storage technology does not have an expiry date and therefore has unlimited functional life.

**Note:** You can generally delete cookies and data stored using local storage technology yourself via your web browser. For details, please refer to the instructions of your web browser manufacturer.

#### B. Use of cookies on our portal

#### I. Essential Cookies

#### 1. Which essential cookies are used for what purpose and for how long?

Service	Purpose	Service provider	Functional life
Consent management	Obtaining and managing consent and storing information about consent decisions	Usercentrics GmbH, Sendlinger Straße 7, 80331 München, Germany	unlimited



OpenID Connect Login	Storage of your login data after a successful login (e.g. name, UPN, tokens)	Liebherr-IT Services GmbH, St. Vitus 1, 88457 Kirchdorf an der Iller, Germany	Until web browser closing
Language settings	Last selected language for the portal, internationalization of the login	Liebherr-IT Services GmbH, St. Vitus 1, 88457 Kirchdorf an der Iller, Germany	unlimited

#### - Consent management

In order for you to manage the use of optional cookies on our portal, we have implemented a consent management service. Via the consent management service, the first time you access our portal, you will be presented with a previously defined query ("Cookies, other technologies and miscellaneous services"), which allows you to accept or decline the use of optional cookies by clicking the appropriate button. In addition, clicking on "settings" will take you to the settings of the consent management service, where you will find inter alia a simplified cookie list, classified by type. With the consent management service, you can inter alia find out about the purposes of the cookies that we use, the data processed in each case as well as any data recipients and, in the case of optional cookies, you can give or withdraw your consent at any time by selecting or deselecting the relevant box.

Please note that essential cookies are already stored upon accessing our portal and that the relevant box is preselected. It is not possible to deselect essential cookies via the consent management service. The functionality of the consent management service itself requires the use of certain cookies.

#### Service provider information:

Usercentrics GmbH, Sendlinger Straße 7, 80331 München, Germany

### Website:

https://usercentrics.com/

General Terms and Conditions: https://usercentrics.com/terms-and-conditions/

Privacy Policy: https://usercentrics.com/privacy-policy/

#### - OpenId Connect Login

We use an OpenId Connect login to store your login data. It represents an open identification protocol for user authentication with an external trusted provider.

#### Language settings

Your language setting is saved locally for the user-orientated language display of our portal. The respective language will be set on our portal, so that it will be displayed in this language.

#### 2. On which legal basis are essential cookies used?

In order to be able to demonstrate that – or whether – you have consented to the use of optional cookies requiring your consent, we store the information about your consent, whether given or not, in order to fulfil our legal obligation to provide evidence in accordance with Article 6 para. 1 point c and Article 6 para. 3 point a GDPR in conjunction with Article 7 para. 1 GDPR.



Furthermore, we use essential cookies for the purposes of legitimate interests in accordance with Article 6 para. 1 point f GDPR.

Our legitimate interests pursued are:

- Trustworthy user identification, user-orientated approach
- Assertion, exercise and defence of legal claims
- Providing and guaranteeing the proper functionalities of our portal

#### 3. How can I object to the use of essential cookies?

You can exercise your right to object by means of the blocking options described below under "Deletion/Blocking of Cookies" (cf. Article 21 para. 5 GDPR), i.e. by blocking essential cookies via your web browser settings.

Please note that if you delete without blocking, essential cookies will be used once again when you access our portal at a later date. Please also note that deactivating or deleting or blocking essential cookies may affect the performance and functionality of our portal and may cause certain features and functions to be unavailable.

#### **II. Optional cookies**

Using the following information, we would like to enable you to make a well-founded decision for or against the use of **optional cookies** and the associated data processing.

1. Which optional cookies are used for what	purpose and for how long?
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Service	Purpose	Service provider	Functional life
Google Analytics	Web analysis	Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland	Up to 2 years

#### Web analysis

Subject to your consent, we use web analysis cookies in order to analyse the use of our portal and thereby be able to improve it continuously. The anonymised user statistics obtained (e.g. number and origin of portal visitors) enable us to optimise our portal and improve its design – such as by placing frequently accessed information or topics on our portal at the right location to meet demand.

Against this background, we use the services detailed hereafter:

#### - Google Analytics

For web analysis we use **"Google Analytics"**, a web analysis service of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (hereinafter collectively "Google"), with the "IP anonymization" extension (also called "IP masking method"). To this end, we have concluded a data processing agreement with Google in accordance with Article 28 GDPR. Google will accordingly process the data collected (data about your terminal equipment or web browser, IP addresses and your portal or application activities) on our behalf for the purposes of evaluating your use of our portal, compiling reports on portal activity and providing other services relating to portal and internet usage.

Data collected within the context of Google Analytics may be stored and processed by Google or subprocessors of Google outside the EU or the EEA and thus in a third country, in particular in the USA. The IP masking method that we use ensures that before the IP address is transferred to a Google server in the USA and stored there, it is shortened within EU member states or in other EEA member states so that no IP address is transferred in its entirety, thereby preventing or considerably complicating identification of a person. Only in exceptional cases will the complete, i.e. entire, IP address be transferred to a Google server in the USA and only shortened there.



For a data transfer to a third country, pursuant to the GDPR, additional conditions are to be complied with in order to ensure that the level of data protection guaranteed in the EU is not undermined. In this case, the data transfer to the USA takes place on the basis of the European Commission's adequacy decision of 10 July 2023. According to this adequacy decision, the USA ensures an adequate level of protection within the meaning of Art. 45 GDPR for personal data transferred from the EU to organisations in the USA that are certified under the "EU-U.S. Data Privacy Framework" (hereinafter "DPF") and included in the "Data Privacy Framework List" (<u>https://www.dataprivacyframework.gov/list</u>), maintained and made publicly available by the U.S. Department of Commerce.

Google LLC is certified under the DPF and included in the Data Privacy Framework List.

#### Service provider information:

Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

#### Google Ads Data Processing Terms:

https://privacy.google.com/businesses/processorterms/

#### Terms of Service:

https://marketingplatform.google.com/about/analytics/terms/us/

#### Overview of data usage in Google Analytics:

https://support.google.com/analytics/answer/6004245?hl=en

#### **Privacy Policy:**

https://policies.google.com/privacy

#### Technical explanation of "IP Anonymization (or IP masking) in Google Analytics"

https://support.google.com/analytics/answer/2763052?hl=en

#### Additional note:

If you wish to deactivate Google Analytics across all websites, you can download and install the "Google Analytics Optout Browser Add-on" at <u>https://tools.google.com/dlpage/gaoptout?hl=en</u>. This option only disables web analysis as long as you are using a web browser for which you have installed the add-on.

#### Tag management system

For the management and control of the web analysis and marketing services described in more detail above, we use a socalled tag management system on our portal. This enables us to integrate the aforementioned web analysis and marketing services on our portal and to manage and control their use without having to change the source code of the portal. The tag management system itself does not store any information on your terminal equipment and is only executed, i.e. only processes and transmits or transfers data, if you have consented to the use of at least one of the web analysis and/or marketing services integrated via the tag management system.

Against this background, we use the services detailed hereafter:

#### - Google Tag Manager

We use the **"Google Tag Manager"**, a tag management system of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (hereinafter collectively "Google"). In this respect, we have concluded a data processing agreement with Google in accordance with Article 28 GDPR.

Data transmitted to Google within the context of the Google Tag Manager may be stored and processed by Google or subprocessors of Google outside the EU or the EEA and thus in a third country, in particular in the USA.

For a data transfer to a third country, pursuant to the GDPR, additional conditions are to be complied with in order to ensure that the level of data protection guaranteed in the EU is not undermined. In this case, the data transfer to the USA takes place on the basis of the European Commission's adequacy decision of 10 July 2023. According to this adequacy decision, the USA ensures an adequate level of protection within the meaning of Article 45 GDPR for personal data transferred from the EU to organisations in the USA that are certified under the "EU-U.S. Data Privacy Framework"



(hereinafter "DPF") and included in the "Data Privacy Framework List" (<u>https://www.dataprivacyframework.gov/list</u>), maintained and made publicly available by the U.S. Department of Commerce.

Google LLC is certified under the DPF and included in the Data Privacy Framework List.

#### Service provider information:

Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

Google Ads Data Processing Terms: https://privacy.google.com/businesses/processorterms/

Terms of Service: https://marketingplatform.google.com/about/analytics/tag-manager/use-policy/

### Privacy Policy:

https://policies.google.com/privacy

#### 2. On which legal basis are optional cookies used?

We use optional cookies on the basis of the consent pursuant to Article 6 para. 1 point a in conjunction with Article 7 GDPR.

#### 3. How can I withdraw the consent that I have given to the use of optional cookies?

When you (first) access our portal, we request inter alia your consent for the use of optional cookies by means of a predefined query ("Cookies, other technologies and miscellaneous services"). You can withdraw the consent that you have given at any time with effect for the future and thereby prevent further collection of your data by deselecting optional cookies (web analysis, marketing) in the settings of the consent management service.

If and insofar as you do not consent or withdraw consent already given (further) data collection by means of optional cookies requiring consent and the associated data processing will cease. This presents no drawbacks when using the portal, unless you also deactivate the cookie functions for essential cookies.

The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

As an alternative to withdrawing your consent, you can also make use of the options described below under "Deletion/Blocking of Cookies" to delete or block cookies using the information provided there.

#### C. Deletion/Blocking of Cookies

Cookies are stored on your terminal equipment, so you have the control over them. If you do not want us to recognise your terminal equipment, you can deactivate or delete cookies already stored on your terminal equipment – manually or automatically – at any time and/or block storage of cookies with future effect by making the appropriate setting in your web browser software, e.g. "do not accept cookies" or similar. Most web browsers can also be configured in such a way that cookie storage is only accepted if you agree to this separately on a case-by-case basis. If you do not wish to accept cookies from our service providers and partners, you should have your web browser set to "block third-party cookies" or similar. Usually, the "Help" function in the menu bar of your web browser shows you how to deactivate or delete cookies already stored there and how to decline new cookies. For details of the options described, please refer to the instructions provided by your web browser manufacturer.

Please note that if you delete without blocking, any essential cookies will be used the next time and we may ask you once again for your consent to optional cookies when you access our portal at a later date. Please also note that deactivating or deleting or blocking essential cookies may affect the performance and functionality of our portal and may cause certain features and functions to be unavailable.

You can manage the settings for the use of optional cookies and the associated data processing at any time in the settings of the consent management service.

#### **Data recipients**

We may transmit your data to:

- Other companies of the Liebherr Group, provided this is necessary to initiate, perform or terminate a contract, or for our part we have a legitimate interest in the transmission and your predominant legitimate interest is not opposed to this;
   The providers of the functions and any other services you actively use;
- Our service providers that we use in order to achieve the above-stated purposes;
- The recipient or recipients you specify;
- Courts of law, courts of arbitration, authorities or legal advisers, if this is necessary to comply with current law or for the establishment, exercise or defence of legal claims.

#### Data transfers to third countries

The transfer of data to bodies in countries outside the European Union or the European Economic Area (so-called third countries) or to international organisations is only permissible (1) if you have given us your consent or (2) if the European Commission has decided that an adequate level of protection exists in a third country (Article 45 GDPR). If the Commission has not made such a decision, we may only transfer your data to recipients located in a third country if appropriate safeguards are in place (e.g., standard data protection clauses adopted by the Commission or the supervisory authority following a specific procedure) and the enforcement of your data subject rights is ensured or the transfer is permissible in individual cases on the grounds of other legal bases (Article 49 GDPR).

Where we transfer your data to third countries, we will inform you of the respective details of the transfer at the relevant points in this data protection declaration.

#### Data erasure and storage period

We will process your data as long as this is necessary for the respective purpose, unless you have effectively objected to the processing of your data or effectively withdrawn any consent you may have given.

Insofar as statutory retention obligations exist, we will be bound to store the data in question for the duration of the retention obligation. Upon expiry of the retention obligation, we will check whether there is any further necessity for the processing. If there is no longer such a necessity, your data will be deleted.

#### **Data security**

We use technical and organisational security measures to ensure that your data is protected against loss, inaccurate alteration or unauthorised access by third parties. Moreover, for our part in every case, only authorised persons have access to your data, and this only insofar as it is necessary within the scope of the above-stated purposes. The transmission of all data is encrypted.

As of: April 2024