



PRIVACY NOTES

DATA PRIVACY

PREAMBLE

With the following data protection declaration, we would like to inform you about the types of your personal data (hereinafter also referred to as "data" for short) that we process, for what purposes and to what extent. The data protection declaration applies to all processing of personal data carried out by us, both as part of the provision of our services and on our websites, in mobile applications and within external online presences, such as our social media profiles (hereinafter collectively referred to as "Online Offer").

The terms used are not gender specific.

Status: September 23, 2023

Responsible

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Imprint:

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Overview of the processing operations

The following overview summarizes the types of data processed and the purposes of their processing and refers to the data subjects.

Types of data processed

- Inventory data.
- Payment data.
- Location data.
- Contact data.
- Content data.
- Contract data.
- Usage data.
- Meta, communication and procedural data.

Categories of data subjects

- Customers.
- Interested parties.
- Communication partners.
- Users.
- Business and contractual partners.
- Pupils / students / participants.

Purposes of processing

- Provision of contractual services and fulfilment of contractual obligations.
- Contact requests and communication.
- Security measures.
- Range measurement.





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- Office and organizational procedures.
- Managing and responding to requests.
- Feedback.
- Marketing.
- Profiles with user-related information.
- Provision of our online services and user experience.
- Information technology infrastructure.

Applicable legal bases

Relevant legal bases according to the DSGVO:

Below you will find an overview of the legal bases of the DSGVO based on which we process personal data. Please note that in addition to the provisions of the GDPR, national data protection regulations may apply in your or our country of residence or domicile. Furthermore, should more specific legal bases be relevant in individual cases, we will inform you of these in the data protection declaration.

- Consent (Art. 6 (1) p. 1 lit. a) DSGVO) The data subject has given his / her consent to the processing of personal data relating to him/her for a specific purpose or purposes.
- Performance of a contract and pre-contractual requests (Art. 6 (1) p. 1 lit. b) DSGVO) Processing is necessary for the performance of a contract to which the data subject is a party or for the performance of pre-contractual measures carried out at the data subject's request.
- Legal obligation (Art. 6 (1) p. 1 lit. c) DSGVO) Processing is necessary for compliance with a legal obligation to which the controller is subject.
- Legitimate interests (Art. 6 (1) p. 1 lit. f) DSGVO) Processing is necessary for the purposes of the legitimate interests of the controller or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data.

National data protection regulations in Germany:

In addition to the data protection regulations of the GDPR, national regulations on data protection apply in Germany. These include the Act on Protection against Misuse of Personal Data in Data Processing (Federal Data Protection Act - BDSG). In particular, the BDSG contains special regulations on the right to information, the right to erasure, the right to object, the processing of special categories of personal data, processing for other purposes and transmission, as well as automated decision-making in individual cases, including profiling. Furthermore, state data protection laws of the individual federal states may apply.

Applicable legal basis according to the Swiss Data Protection Act:

If you are in Switzerland, we process your data based on the Federal Data Protection Act (in short "Swiss DPA"). This also applies if our processing of your data otherwise affects you in Switzerland and you are affected by the processing. In principle, the Swiss DPA does not require (unlike the GDPR, for example) that a legal basis for the processing of personal data must be stated. We only process personal data if the processing is lawful, is carried out in good faith and is proportionate (Art. 6 (1) and (2) of the Swiss DPA). Furthermore, personal data is only obtained by us for a specific purpose that is recognizable to the data subject and is only processed in a way that is compatible with these purposes (Art. 6 para. 3 of the Swiss Data Protection Act).

Note on applicability DSGVO and Swiss DSG:

This data protection notice serves to provide information in accordance with both the Swiss Federal Data Protection Act (Swiss DSG) and the General Data Protection Regulation (DSGVO). For this reason, we ask you to note that due to the broader spatial application and comprehensibility, the terms of the GDPR are used. Instead of the terms "processing" of "personal data", "overriding interest" and "particularly sensitive personal data" used in the Swiss DPA, the terms "processing" of "personal data" as well as "legitimate interest" and "special categories of data" used in the GDPR are used. However, the legal meaning of the terms will continue to be determined in





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accordance with the Swiss DPA within the scope of the applicability of the Swiss DPA.

Security measures

We take appropriate technical and organizational measures in accordance with the legal requirements, taking into account the state of the art, the implementation costs and the nature, scope, circumstances and purposes of the processing, as well as the different probabilities of occurrence and the extent of the threat to the rights and freedoms of natural persons, in order to ensure a level of protection appropriate to the risk.

The measures include safeguarding the confidentiality, integrity and availability of data by controlling physical and electronic access to the data as well as access to, input of, disclosure of, assurance of availability of and segregation of the data. Furthermore, we have established procedures to ensure the exercise of data subjects' rights, the deletion of data, and responses to data compromise. Furthermore, we already take the protection of personal data into account during the development or selection of hardware, software as well as procedures in accordance with the principle of data protection, through technology design and through data protection-friendly default settings.

TLS/SSL encryption (https): To protect user data transmitted through our online services, we use TLS/SSL encryption. Secure Sockets Layer (SSL) is the standard technology for securing Internet connections by encrypting the data transmitted between a website or app and a browser (or between two servers). Transport Layer Security (TLS) is an updated and more secure version of SSL. Hyper Text Transfer Protocol Secure (HTTPS) appears in the URL when a website is secured by an SSL/TLS certificate.

Transmission of personal data

During our processing of personal data, the data may be transferred to or disclosed to other entities, companies, legally independent organizational units or persons. Recipients of this data may include, for example, service providers commissioned with IT tasks or providers of services and content that are integrated into a website. In such cases, we comply with the legal requirements and conclude appropriate contracts or agreements that serve to protect your data with the recipients of your data.

International data transfers

use are certified under the Data Privacy Framework.

Data processing in third countries: if we process data in a third country (i.e., outside the European Union (EU), the European Economic Area (EEA)) or the processing takes place in the context of using third-party services or disclosing or transferring data to other persons, entities or companies, this will only be done in accordance with the legal requirements. If the level of data protection in the third country has been recognized by means of an adequacy decision (Art. 45 DSGVO), this serves as the basis for the data transfer. Otherwise, data transfers will only take place if the level of data protection is otherwise ensured, by standard contractual clauses (Art. 46(2)(c) DSGVO), explicit consent or in the case of contractual or legally required transfer (Art. 49(1) DSGVO). In all other respects, we will inform you of the basis for third-country transfers in the case of individual third-country providers, with the adequacy decisions taking precedence as the basis. Information on third-country transfers and available adequacy decisions can be found in the EU Commission's information service: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection_de. EU-US Trans-Atlantic Data Privacy Framework: Within the framework of the so-called "Data Privacy Framework" (DPF), the EU Commission has also recognized the level of data protection for certain companies from the USA as safe within the framework of the adequacy decision of July 10, 2023. The list of certified companies as well as further information on the DPF can be found on the website of the U.S. Department of Commerce at https://www.dataprivacyframework.gov/. We will inform you in the privacy notice which service providers we

Disclosure of personal data abroad: In accordance with the Swiss Data Protection Act (DSG), we only disclose personal data abroad if adequate protection of the data subjects is guaranteed (Art. 16 Swiss DSG). If the Federal Council has not determined adequate protection (list:

https: //www.bj.admin.ch/bj/de/home/staat/datenschutz/internationales/anerkennung-staaten.html), we take alternative security measures. These may include international treaties, specific guarantees, data protection clauses in contracts, standard data protection clauses approved by the Swiss Federal Data Protection and Information Commissioner (FDPIC), or internal company data protection regulations recognized in advance by the FDPIC or a competent data protection authority in another country.





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According to Art. 16 of the Swiss FADP, exceptions may be allowed for the disclosure of data abroad if certain conditions are met, including consent of the data subject, performance of a contract, public interest, protection of life or physical integrity, data made public or data from a register provided for by law. These disclosures are always made in accordance with legal requirements.

Deletion of data

The data processed by us will be deleted in accordance with the legal requirements as soon as their consents permitted for processing are revoked or other permissions cease to apply (e.g. if the purpose of processing this data has ceased to apply or it is not necessary for the purpose). If the data are not deleted because they are required for other and legally permissible purposes, their processing will be limited to these purposes. That is, the data is blocked and not processed for other purposes. This applies, for example, to data that must be retained for reasons of commercial or tax law or whose storage is necessary for the assertion, exercise or defence of legal claims or to protect the rights of another natural or legal person. As part of our privacy notices, we may provide users with further information regarding the deletion as well as the retention of data that is specific to the processing operation in question.

Additional Privacy Notice for participants of the GS Trophy 2026 International Qualifier only

This section aims to provide all participants (referred to as the "Participants") of the GS Trophy 2026 International Qualifier (referred to as the "Qualifier") with important additional information regarding the privacy notice associated with the Qualifier only, organized by TWTMoto GmbH (Garmisch-Partenkirchen, Germany). The following privacy policy is applicable to all persons participating in this Qualifier besides the sections above and below:

The data collected at the Qualifier is processed for the following purposes:

- Participant handling (invitation management, event organisation)
- Marketing purposes (broad reporting (as described below) about the Qualifier and Int. GS Trophy 2026 but also with regards to winners of the Qualifier and Competitors of the Int. GS Trophy 2026 in particular)
- Winner's handling (provision of personal data to BMW AG)

In what way does TWTMoto GmbH process the data?

A) Registration for the GS Trophy 2026 International Qualifier via this registration website

- data processing according to Article 6 (1) b) GDPR

The purpose of data processing via our registration website is to collect all Participant's data which is necessary for the organization of the Qualifier.

In the context of the registration, the Participant will have the opportunity to get in touch with representatives of the GS Trophy 2026 International Qualifier organizational team.

All Participants may book the participation at the Qualifier via this registration website.

Required data categories:

- **General data:** salutation, title, surname, first name, address, mobile phone number, email address, date of birth, nationality, country of residence, driving licence type and date of issue
- Data for material provision: T-Shirt Size
- Data to prove compliance with T&C of the Qualifier: type of motorcycle used for the pre-round, vehicle documents of owned BMW motorcycle

B) Event documentation and media coverage

- data processing according to Article 6 (1) b) GDPR

During the Qualifier, photographic and audio-visual recordings (referred to hereafter as "audio-visual media") will be taken by photographers and camera operators working on behalf of TWTMoto GmbH in connection with the





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Participant's involvement on the Qualifier to ensure a broad medial reporting about the Qualifier itself but also with regards to the Participants and winners of the Qualifier in particular.

The participants of the Qualifier are aware that the Qualifier will be accompanied by photographers and camera operators during the entire Qualifier (i.e., the medial support is not limited to the Special Stages or Exercises but may also cover interviews, side-events or other moments that reflect the character of the Qualifier) in order to make the spirit of the Qualifier globally accessible to as many people as possible. Qualifier audio-visual media is hereby essential for the Qualifier and therefore an essential part of the Terms & Conditions.

All such audio-visual media of the Qualifier may be used and exploited at no cost by TWTMoto GmbH and may be shared with BMW AG and its affiliated companies, BMW Importers, MRPs of the Int. GS Trophy 2026, BMW's official partners and audio-visual media service providers of BMW AG (hereinafter "BMW") as following: All such audio-visual media of the Qualifier may be used, published and copied free of charge at any time for an unlimited period in any geographical location and in any publications supporting in-house and external press and communications work. The use of the audio-visual media of the Qualifier for a broad medial reporting may include social media posts, marketing campaigns, press communication, online articles including photos, footage or videos, and publications by internal communications - in particular but not limited to - on TWTMoto GmbH's and BMW's social media channels and TWTMoto GmbH's and BMW's print materials as well as public radio, television, online television and print media. The same applies for any reproductions and modified versions thereof.

TWTMoto GMBH and BMW have the right to name the Qualifier participant including but not limited to its start number, country of residence, nationality and name.

Required data categories

- Start number
- · Surname, first name, nationality
- Country of residence
- Participant email address
- Qualifier Audio-Visual Media

C) Transmission of winner data to BMW for registration for the roof Int. GS Trophy 2026.

- data processing according to Article 6 (1) b) GDPR

Should a participant emerge as a winner in the Qualifier (referred to as the "Winners") and provided that the participation conditions are met, they will have the opportunity to register as a competitor in the Int. GS Trophy 2026.

TWTMoto GmbH will transmit the data of the winners of the Qualifier to BMW for the purpose of registering the winners of the Qualifier to the roof event "Int. GS Trophy 2026".

Required data categories

- Team name
- Salutation
- First and last names of winners
- Email address of winners
- Country of residence of winners

D) Sanction party list screening

- data processing according to Article 6 (1) c) GDPR and Article 6 (1) f) GDPR

TWTMoto GmbH regularly conducts sanction list checks to ensure compliance with economic sanctions and export controls. This is legally required to prevent business transactions with persons or organizations that are listed on sanction lists.





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During the check, personal data such as name, address, date of birth, and nationality are compared against the current sanction lists. The comparison is done to determine whether business relationships exist with listed persons or companies.

These checks help TWTMoto GmbH to ensure compliance with applicable sanction regulations and avoid potential legal consequences. The processing of personal data is necessary to fulfil a legal obligation and is carried out in strict compliance with data protection regulations.

Required data categories

- First and last names
- Address
- Date of birth
- Nationality

Rights of the data subjects

Data subjects' rights under the GDPR: As a data subject, you are entitled to various rights under the GDPR, which arise from Articles 15 to 21 of the GDPR:

- **Right to object:** you have the right to object at any time, on grounds relating to your situation, to the processing of personal data concerning you which is carried out on the basis of Art. 6(1)(e) or (f) DSGVO; this also applies to profiling based on these provisions. If the personal data concerning you is processed for the purpose of direct marketing, you have the right to object at any time to the processing of personal data concerning you for the purpose of such marketing; this also applies to profiling insofar as it is related to such direct marketing.
- Right to withdraw consent: You have the right to revoke any consent given at any time.
- **Right to information:** you have the right to request confirmation as to whether data in question is being processed and to information about this data, as well as further information and a copy of the data in accordance with the legal requirements.
- **Right to rectification:** you have the right, in accordance with the law, to request that data concerning you be completed or that inaccurate data concerning you be rectified.
- Right to erasure and restriction of processing: In accordance with the legal requirements, you have the right to demand that data concerning you be deleted without delay, or alternatively, in accordance with the legal requirements, to demand restriction of the processing of the data.
- **Right to data portability:** you have the right to receive data relating to you that you have provided to us in a structured, common and machine-readable format, or to request that it be transferred to another controller, in accordance with the law.
- Complaint to supervisory authority: In accordance with the law and without prejudice to any other
 administrative or judicial remedy, you also have the right to lodge a complaint with a data protection
 supervisory authority, in particular a supervisory authority in the Member State where you usually reside,
 the supervisory authority of your place of work or the place of the alleged infringement, if you consider
 that the processing of personal data concerning you infringes the GDPR.

Rights of data subjects under the Swiss DPA

As a data subject, you are entitled to the following rights in accordance with the requirements of the Swiss DPA:

• **Right of access:** you have the right to request confirmation as to whether personal data concerning you is being processed and to receive such information as is necessary to enable you to exercise your rights under this Act and to ensure transparent data processing.





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- **Right to obtain the release or transfer of data:** you have the right to request the release of your personal data that you have disclosed to us in a commonly used electronic format.
- Right to rectification: you have the right to request the rectification of inaccurate personal data concerning you.
- **Right to object, erasure and destruction:** you have the right to object to the processing of your data, as well as to request that the personal data concerning you be erased or destroyed.

Use of cookies

Cookies are small text files, or other memory notes, which store information on end devices and read information from the end devices. For example, to store the login status in a user account, a shopping cart content in an eshop, the content accessed or used functions of an online offer. Cookies can further be used for various purposes, e.g. for purposes of functionality, security and comfort of online offers as well as the creation of analyses of visitor flows.

Notes on consent

We use cookies in accordance with legal requirements. Therefore, we obtain prior consent from users except where it is not required by law. Consent is not required if the storage and reading of information, including cookies, is absolutely necessary to provide a telemedia service (i.e., our online offering) expressly requested by users. The strictly necessary cookies usually include cookies with functions related to the display and operability of the online offer, load balancing, security, storage of users' preferences and choices or similar purposes related to the provision of the main and secondary functions of the online offer requested by the users. The revocable consent is clearly communicated to the users and contains the information about the respective cookie use.

Notes on legal bases under data protection law

The legal basis under data protection law on which we process users' personal data using cookies depends on whether we ask users for consent. If users consent, the legal basis for processing their data is their declared consent. Otherwise, the data processed with the help of cookies is processed based on our legitimate interests (e.g. in the business operation of our online offer and improvement of its usability) or, if this is done in the context of the performance of our contractual obligations, if the use of cookies is necessary to fulfil our contractual obligations. For what purposes the cookies are processed by us, we clarify in the course of this privacy policy or in the context of our consent and processing procedures.

Storage duration:

Regarding the storage duration, the following types of cookies are distinguished:

- Temporary cookies (also: session cookies): temporary cookies are deleted at the latest after a user has left an online offer and closed his end device (e.g. browser or mobile application).
- Permanent cookies: Permanent cookies remain stored even after the end device is closed. For example,
 the login status can be saved or preferred content can be displayed directly when the user visits a website
 again. Likewise, user data collected with the help of cookies can be used for reach measurement. Unless
 we provide users with explicit information about the type and storage duration of cookies (e.g., as part of
 obtaining consent), users should assume that cookies are permanent and that the storage period can be
 up to two years.

General information on revocation and objection (so-called "opt-out")

Users can revoke the consents they have given at any time and object to the processing in accordance with the legal requirements. For this purpose, users can, among other things, restrict the use of cookies in the settings of their browser (whereby this may also restrict the functionality of our online offer). An objection to the use of cookies for online marketing purposes can also be declared via the websites https://optout.aboutads.info and https://optout.aboutads.info and https://www.youronlinechoices.com/.





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• Legal basis: Legitimate interests (Art. 6 para. 1 p. 1 lit. f) DSGVO). Consent (Art. 6 para. 1 p. 1 lit. a) DSGVO).

Further notes on processing processes, procedures and services:

• Processing of cookie data based on consent: We use a cookie consent management procedure, in the context of which the consent of users to the use of cookies, or the processing and providers mentioned in the cookie consent management procedure can be obtained and managed and revoked by users. Here, the declaration of consent is stored in order not to have to repeat its query and to be able to prove the consent in accordance with the legal obligation. The storage can take place on the server side and/or in a cookie (so-called opt-in cookie, or with the help of comparable technologies), in order to be able to assign the consent to a user or their device. Subject to individual information on the providers of cookie management services, the following information applies: The duration of the storage of consent can be up to two years. Here, a pseudonymous user identifier is formed and stored with the time of consent, information on the scope of consent (e.g., which categories of cookies and/or service providers) as well as the browser, system and end device used; legal basis: consent (Art. 6 para. 1 p. 1 lit. a) DSGVO).

Business services

We process data of our contractual and business partners, e.g. customers and interested parties (collectively referred to as "contractual partners") in the context of contractual and comparable legal relationships as well as related measures and in the context of communication with contractual partners (or pre-contractual), e.g. to answer inquiries.

We process this data in order to fulfil our contractual obligations. These include the obligations to provide the agreed services, any update obligations and remedies in the event of warranty and other service disruptions. In addition, we process the data to protect our rights and for the purpose of administrative tasks associated with these obligations and company organization. Furthermore, we process the data on the basis of our legitimate interests in proper and business management as well as security measures to protect our contractual partners and our business operations from misuse, endangerment of their data, secrets, information and rights (e.g. for the involvement of telecommunications, transport and other auxiliary services as well as subcontractors, banks, tax and legal advisors, payment service providers or tax authorities). Within the framework of applicable law, we only disclose the data of contractual partners to third parties to the extent that this is necessary for the aforementioned purposes or to fulfil legal obligations. Contractual partners will be informed about other forms of processing, e.g. for marketing purposes, within the framework of this data protection declaration. We inform the contractual partners which data is required for the aforementioned purposes before or during data collection, e.g. in online forms, by means of special marking (e.g. colours) or symbols (e.g. asterisks or similar), or in person.

We delete the data after the expiry of legal warranty and comparable obligations, i.e., generally after 4 years, unless the data is stored in a customer account, e.g., as long as it must be kept for legal archiving reasons. The statutory retention period shall be ten years for documents relevant under tax law as well as for commercial books, inventories, opening balances, annual financial statements, the work instructions required to understand these documents and other organizational documents and accounting records, and six years for received commercial and business letters and reproductions of sent commercial and business letters. The period shall commence at the end of the calendar year in which the last entry was made in the book, the inventory, the opening balance sheet, the annual financial statements or the management report was prepared, the commercial or business letter was received or dispatched or the accounting document was created, furthermore the recording was made or the other documents were created.

Insofar as we use third-party providers or platforms to provide our services, the terms and conditions and data protection notices of the respective third-party providers or platforms shall apply in the relationship between the users and the providers.

• **Types of data processed:** inventory data (e.g. names, addresses); payment data (e.g. bank details, invoices, payment history); contact data (e.g. e-mail, telephone numbers); contract data (e.g. subject matter of contract, term, customer category).





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- Data subjects: Prospective customers. Business and contractual partners.
- Purposes of processing: provision of contractual services and fulfilment of contractual obligations;
 contact requests and communication; office and organizational procedures. Management and response to requests.
- Legal grounds: contract performance and pre-contractual inquiries (Art. 6 para. 1 p. 1 lit. b) DSGVO); legal obligation (Art. 6 para. 1 p. 1 lit. c) DSGVO). Legitimate interests (Art. 6 para. 1 p. 1 lit. f) DSGVO).

Further notes on processing operations, procedures and services

Travel-related services: We process the data of our customers and prospective customers (uniformly
referred to as "customers") in accordance with the underlying contractual relationship. We may also
process information about the characteristics and circumstances of persons or things belonging to them
if this is necessary in the context of the contractual relationship. This may include, for example,
information on personal circumstances, mobile tangible assets and financial situation

In the context of our commissioning, it may be necessary for us to process special categories of data within the meaning of Art. 9 (1) DSGVO, in particular information on the health of a person. The processing is done to protect the health interests of the customers and otherwise only with the consent of the customers.

If required for the fulfilment of the contract or required by law, or consented to by customers or based on our legitimate interests, we disclose or transfer the data of customers, for example, to the service providers involved in the performance of travel services; legal basis: contract performance and precontractual requests (Art. 6 para. 1 sentence 1 lit. b) DSGVO).

Events and functions: we process the data of participants in the events, functions and similar activities
offered or hosted by us (hereinafter uniformly referred to as "participants" and "events") in order to enable
them to participate in the events and take advantage of the services or promotions associated with
participation.

If we process health-related data, religious, political or other special categories of data in this context, then this is done within the scope of disclosure (e.g., for thematically oriented events or serves health care, safety or is done with the consent of the data subjects).

The required information is identified as such in the context of the order, purchase order or comparable contract conclusion and includes the information required for the provision of services and billing, as well as contact information in order to be able to hold any consultations. Insofar as we obtain access to information of the end customers, employees or other persons, we process this in accordance with the legal and contractual requirements; legal basis: contract performance and pre-contractual inquiries (Art. 6 para. 1 p. 1 lit. b) DSGVO).

• Education and training services: We process the data of participants in our education and training services (uniformly referred to as "trainees") in order to provide them with our training services. The data processed in this context, the nature, scope, purpose and necessity of their processing are determined by the underlying contractual and training relationship. The forms of processing also include the performance assessment and evaluation of our services and those of the teachers. During our activities, we may also process special categories of data, in particular data relating to the health of trainees and students, as well as data revealing ethnic origin, political opinions, religious or philosophical beliefs. For





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this purpose, we obtain the express consent of the trainees, if required, and otherwise process the special categories of data only if it is necessary for the provision of the training services, for purposes of preventive health care, social protection or the protection of vital interests of the trainees. Legal basis: contract performance and pre-contractual inquiries (Art. 6 para. 1 p. 1 lit. b) DSGVO).

Payment procedure

subject rights.

In the context of contractual and other legal relationships, due to legal obligations or otherwise based on our legitimate interests, we offer data subjects efficient and secure payment options and use other service providers in addition to banks and credit institutions for this purpose (collectively, "payment service providers"). The data processed by the payment service providers includes inventory data, such as the name and address, bank data, such as account numbers or credit card numbers, passwords, TANs and checksums, as well as the contract, total and recipient-related information. The information is required to carry out the transactions. However, the data entered is only processed by the payment service providers and stored with them. I.e., we do not receive any account or credit card related information, but only information with confirmation or negative information of the payment. Under certain circumstances, the payment service providers transmit the data to credit agencies. The purpose of this transmission is to check identity and creditworthiness. In this regard, we refer to the terms and conditions and the privacy notices of the payment service providers. For payment transactions, the terms and conditions and data protection notices of the respective payment service providers apply, which can be accessed within the respective websites or transaction applications. We

• Types of data processed: inventory data (e.g., names, addresses); payment data (e.g., bank details, invoices, payment history); contract data (e.g., subject matter of contract, term, customer category); usage data (e.g., websites visited, interest in content, access times); meta, communication and procedural data (e.g., IP addresses, time data, identification numbers, consent status).

also refer to these for the purpose of further information and assertion of revocation, information and other data

- Data subjects: Customers. Interested parties.
- Legal basis: contract performance and pre-contractual inquiries (Art. 6 para. 1 p. 1 lit. b) DSGVO).

Further notes on processing processes, procedures and services

Mollie: payment services (technical connection of online payment methods); service provider: Mollie
B.V., Keizersgracht 126, 1015 CW Amsterdam, Netherlands; Legal basis: contract performance and precontractual requests (Art. 6 para. 1 p. 1 lit. b) DSGVO); Website: https://www.mollie.com/de. Privacy
policy: https://www.mollie.com/de/privacy.

Provision of the online offer and web hosting

We process users' data to provide them with our online services. For this purpose, we process the user's IP address, which is necessary to transmit the content and functions of our online services to the user's browser or terminal device.

- Types of data processed: Usage data (e.g. web pages visited, interest in content, access times); meta, communication and procedural data (e.g. IP addresses, time data, identification numbers, consent status).
- Data subjects: Users (e.g. website visitors, users of online services).
- Purposes of processing: provision of our online offer and user-friendliness; information technology
 infrastructure (operation and provision of information systems and technical equipment (computers,
 servers, etc.).). Security measures.
- Legal grounds: legitimate interests (Art. 6 para. 1 p. 1 lit. f) DSGVO).





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Further notes on processing processes, procedures and services:

- Collection of access data and log files: access to our online offer is logged in the form of so-called "server log files". The server log files may include the address and name of the web pages and files accessed, the date and time of access, the volume of data transferred, notification of successful access, browser type and version, the user's operating system, referrer URL (the previously visited page) and, as a rule, IP addresses and the requesting provider. The server log files may be used, on the one hand, for security purposes, e.g., to prevent server overload (especially in the event of abusive attacks, so-called DDoS attacks) and, on the other hand, to ensure the utilization of the servers and their stability; Legal basis: Legitimate interests (Art. 6 para. 1 p. 1 lit. f) DSGVO). Deletion of data: Log file information is stored for a maximum period of 30 days and then deleted or anonymized. Data whose further storage is required for evidentiary purposes is exempt from deletion until final clarification of the respective incident.
- web-crossing: Services in the field of providing information technology infrastructure and related services (e.g. storage space and/or computing capacities); Legal basis: Legitimate interests (Art. 6 para. 1 p. 1 lit. f) DSGVO); Order processing agreement: Provided by the service provider; Service provider: web-crossing GmbH, Eduard-Bodem-Gasse 9, 6020 Innsbruck, Tyrol, Austria; Website: https://www.web-crossing.com/datenschutz/.

Contact and inquiry management

When contacting us (e.g. by mail, contact form, e-mail, telephone or via social media) as well as in the context of existing user and business relationships, the information of the inquiring persons is processed to the extent necessary to respond to the contact requests and any requested actions.

- Types of data processed: contact data (e.g. e-mail, telephone numbers); content data (e.g. entries in online forms); usage data (e.g. websites visited, interest in content, access times); meta, communication and procedural data (e.g. .IP addresses, time data, identification numbers, consent status).
- Data subjects: Communication partners.
- **Purposes of processing:** contact requests and communication; managing and responding to requests; feedback (e.g. collecting feedback via online form). Provision of our online offer and user friendliness.
- **Legal basis:** Legitimate interests (Art. 6 para. 1 p. 1 lit. f) DSGVO). Contract fulfilment and pre-contractual inquiries (Art. 6 para. 1 p. 1 lit. b) DSGVO).

Further notes on processing operations, procedures and services

• Contact form: If users contact us via our contact form, e-mail or other communication channels, we process the data communicated to us in this context to process the communicated request; Legal basis: Contract performance and pre-contractual inquiries (Art. 6 para. 1 p. 1 lit. b) DSGVO), Legitimate interests (Art. 6 para. 1 p. 1 lit. f) DSGVO).

Web analysis, monitoring and optimization

Web analytics (also referred to as "reach measurement") is used to evaluate the flow of visitors to our online offering and may include behaviour, interests or demographic information about visitors, such as age or gender, as pseudonymous values. With the help of reach analysis, we can see, for example, at what time our online offer or its functions or content are most frequently used or invite re-use. Likewise, we can understand which areas need optimization.

In addition to web analytics, we may also use testing procedures, for example, to test and optimize different versions of our online offering or its components.

Unless otherwise stated below, profiles, i.e. data summarized for a usage process, may be created for these purposes and information may be stored in a browser, or in a terminal device, and read from it. The information





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collected includes websites visited and elements used there, as well as technical information such as the browser used, the computer system used, and information on usage times. If users have agreed to the collection of their location data from us or from the providers of the services we use, location data may also be processed. The IP addresses of the users are also stored. However, we use an IP masking procedure (i.e., pseudonymization by shortening the IP address) to protect users. In general, we do not store any clear user data (such as e-mail addresses or names) for the purposes of web analysis, A/B testing and optimization, but rather pseudonyms. This means that we as well as the providers of the software used do not know the actual identity of the users, but only the information stored in their profiles for the purposes of the respective procedures.

- Types of data processed: Usage data (e.g. websites visited, interest in content, access times); meta, communication and procedural data (e.g. IP addresses, time data, identification numbers, consent status).
- Data subjects: Users (e.g. Website visitors, users of online services).
- Purposes of processing: reach measurement (e.g. access statistics, recognition of returning visitors);
 profiles with user-related information (creation of user profiles). Provision of our online services and user experience.
- Security measures: IP masking (pseudonymization of the IP address).
- Legal grounds: consent (Art. 6 para. 1 p. 1 lit. a) DSGVO). Legitimate interests (Art. 6 para. 1 p. 1 lit. f) DSGVO).

Further notes on processing processes, procedures and services

Google Analytics 4: We use Google Analytics to measure and analyse the use of our online offer on the basis of a pseudonymous user identification number. This identification number does not contain any unique data, such as names or email addresses. It is used to assign analysis information to an end device in order to recognize which content users have accessed within one or various usage processes, which search terms they have used, have accessed again or have interacted with our online offering. Likewise, the time of use and its duration are stored, as well as the sources of the users referring to our online offer and technical aspects of their end devices and browsers. In the process, pseudonymous profiles of users are created with information from the use of various devices, whereby cookies may be used. Google Analytics does not log or store individual IP addresses for EU users. However, Analytics provides coarse geographic location data by deriving the following metadata from IP addresses: City (and the derived latitude and longitude of the city), Continent, Country, Region, Subcontinent (and ID-based counterparts). For EU traffic, IP address data is used exclusively for this derivation of geolocation data before being immediately deleted. They are not logged, are not accessible, and are not used for any other purpose. When Google Analytics collects measurement data, all IP queries are performed on EU-based servers before traffic is forwarded to Analytics servers for processing; service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; Legal basis: Legitimate interests (Art. 6 para. 1 p. 1 lit. f) DSGVO); Website: https://marketingplatform.google.com/intl/de/about/analytics/; Privacy policy: https: //policies.google.com/privacy; Order processing

 $\textbf{agreement:} \ \textbf{https:} \ \underline{\textbf{//business.safety.google/adsprocessorterms/;}} \ \textbf{Basis third country transfer:} \ \textbf{EU-US}$

Data Privacy Framework (DPF), Standard Contractual

Clauses(https://business.safety.google/adsprocessorterms); Opt-out: Opt-Out

Plugin: https://tools.google.com/dlpage/gaoptout?hl=de, Ad Display Settings: https://adssettings.google.com/authenticated. Further

information: https://business.safety.google/adsservices/ (types of processing and data processed).

• Google Tag Manager: Google Tag Manager is a solution with which we can manage so-called website tags via an interface and thus integrate other services into our online offering (please refer to further





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information in this privacy policy). With the Tag Manager itself (which implements the tags), therefore, no profiles of users are created, or cookies are stored, for example. Google only learns the IP address of the user, which is necessary to run the Google Tag Manager; **service provider**: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; **Legal basis**: consent (Art. 6 para. 1 p. 1 lit. a)

DSGVO); Website: https://marketingplatform.google.com; Privacy

policy: https://policies.google.com/privacy; Order processing agreement:

https://business.safety.google/adsprocessorterms. Basis for third country transfers: EU-US Data

Privacy Framework (DPF), standard contractual

clauses(https://business.safety.google/adsprocessorterms).

Presence in social networks (social media)

We maintain online presences within social networks and process user data in this context to communicate with users active there or to offer information about us.

We would like to point out that user data may be processed outside the European Union. This may result in risks for users because, for example, it could make it more difficult to enforce users' rights.

Furthermore, user data is usually processed within social networks for market research and advertising purposes. For example, usage profiles can be created based on the usage behaviour and resulting interests of the users. The usage profiles can in turn be used, for example, to place advertisements within and outside the networks that presumably correspond to the interests of the users. For these purposes, cookies are usually stored on the users' computers, in which the usage behaviour and interests of the users are stored. Furthermore, data independent of the devices used by the users may also be stored in the usage profiles (especially if the users are members of the respective platforms and are logged in to them).

For a detailed presentation of the respective forms of processing and the options to object (opt-out), we refer to the privacy statements and information provided by the operators of the respective networks.

In the case of requests for information and the assertion of data subject rights, we also point out that these can be asserted most effectively with the providers. Only the providers have access to the users' data and can take appropriate measures and provide information directly. If you still need assistance, you can contact us.

- Types of data processed: contact data (e.g. e-mail, telephone numbers); content data (e.g. entries in online forms); usage data (e.g. websites visited, interest in content, access times); meta, communication and procedural data (e.g. IP addresses, time data, identification numbers, consent status).
- Data subjects: Users (e.g. Website visitors, users of online services).
- Purposes of processing: contact requests and communication; feedback (e.g., collecting feedback via online form). Marketing.
- Legal basis: Legitimate interests (Art. 6 para. 1 p. 1 lit. f) DSGVO).

Further notes on processing operations, procedures and services

- Instagram: social network; service provider: Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland; Legal Grounds: Legitimate Interests (Art. 6 (1) p. 1 lit. f)
 DSGVO); Website: https://www.instagram.com. Privacy
 policy: https://instagram.com/about/legal/privacy.
- Facebook pages: Profiles within the social network Facebook We are jointly responsible with Meta Platforms Ireland Limited for the collection (but not the further processing) of data of visitors to our Facebook page (so-called "fan page"). This data includes information about the types of content users view or interact with, or the actions they take (see under "Things You and Others Do and Provide" in the Facebook Data Policy: https://www.facebook.com/policy), as well as information about the devices users use (e.g., IP addresses, operating system, browser type, language settings, cookie data; see under "Device Information" in the Facebook Data Policy: https://www.facebook.com/policy). As explained in the Facebook Data Policy under "How do we use this information?", Facebook also collects and uses





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information to provide analytics services, called "Page Insights," to Page operators to provide them with insights into how people interact with their Pages and with content associated with them. We have entered into a special agreement with Facebook ("Page Insights

Information," https://www.facebook.com/legal/terms/page_controller_addendum), which governs in particular which security measures Facebook must observe and in which Facebook has agreed to fulfil the data subject rights (i.e. Users can, for example, address information or deletion requests directly to Facebook). The rights of users (in particular to information, deletion, objection and complaint to the competent supervisory authority), are not restricted by the agreements with Facebook. Further information can be found in the "Information on Page"

Insights"(https://www.facebook.com/legal/terms/information_about_page_insights_data); service provider: Meta Platforms Ireland Limited, Merrion Road, Dublin 4, D04 X2K5, Ireland; Legal

basis: Legitimate interests (Art. 6 para. 1 p. 1 lit. f)

DSGVO); Website: https://www.facebook.com; Privacy

policy: https: <u>//www.facebook.com/about/privacy</u>; Basis third country transfer: EU-US Data Privacy

Framework (DPF), Standard Contractual

Clauses(https://www.facebook.com/legal/EU_data_transfer_addendum). Further information: Shared

Responsibility

Agreement: https://www.facebook.com/legal/terms/information_about_page_insights_data. Joint accountability is limited to the collection by and transfer of data to Meta Platforms Ireland Limited, a company based in the EU. Further processing of the data is the sole responsibility of Meta Platforms Ireland Limited, which concerns in particular the transfer of the data to the parent company Meta Platforms, Inc. in the USA (based on the standard contractual clauses concluded between Meta Platforms Ireland Limited and Meta Platforms, Inc.).

YouTube: Social network and video platform; service provider: Google Ireland Limited, Gordon House,
Barrow Street, Dublin 4, Ireland; Legal basis: Legitimate interests (Art. 6 para. 1 p. 1 lit. f)
 DSGVO); Privacy policy: https://policies.google.com/privacy: Basis third country transfer: EU-US Data
Privacy Framework (DPF). Option to object (opt-out): https://adssettings.google.com/authenticated.

Plugins and embedded functions and content

We integrate functional and content elements into our online offer that are obtained from the servers of their respective providers (hereinafter referred to as "third-party providers"). These can be, for example, graphics, videos or city maps (hereinafter uniformly referred to as "content").

The integration always requires that the third-party providers of this content process the IP address of the user, since without the IP address they could not send the content to their browser. The IP address is thus required for the presentation of this content or functionality. We strive to use only such content whose respective providers use the IP address only for the delivery of the content. Third-party providers may also use so-called pixel tags (invisible graphics, also known as "web beacons") for statistical or marketing purposes. The "pixel tags" can be used to analyse information such as visitor traffic on the pages of this website. The pseudonymous information may further be stored in cookies on the user's device and may contain, among other things, technical information about the browser and operating system, referring websites, time of visit and other information about the use of our online offer as well as be linked to such information from other sources.

- Types of data processed: Usage data (e.g. websites visited, interest in content, access times); meta, communication and procedural data (e.g. IP addresses, time data, identification numbers, consent status); inventory data (e.g. names, addresses); contact data (e.g. e-mail, telephone numbers); content data (e.g. entries in online forms). Location data (information about the geographical position of a device or person).
- Data subjects: Users (e.g. Website visitors, users of online services).
- Purposes of processing: provision of our online offer and user-friendliness.





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• Legal grounds: Legitimate interests (Art. 6 para. 1 p. 1 lit. f) DSGVO).

Further notes on processing processes, procedures and services:

- Google Maps: We integrate the maps of the service "Google Maps" of the provider Google. The processed data may include, in particular, IP addresses and location data of the users; service provider: Google Cloud EMEA Limited, 70 Sir John Rogerson's Quay, Dublin 2, Ireland; Legal basis: Legitimate interests (Art. 6 para. 1 p. 1 lit. f) DSGVO); Website: https://mapsplatform.google.com/; Privacy policy: https://mapsplatform.google.com/; Privacy Framework (DPF).
- YouTube videos: Video content; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; Legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) DSGVO); Website: https://www.youtube.com; Privacy policy: https://policies.google.com/privacy; Basis third country transfer: EU-US Data Privacy Framework (DPF). Option to object (opt-out): Opt-Out Plugin: https://tools.google.com/dlpage/gaoptout?hl=de, Ad Display

Settings: https://adssettings.google.com/authenticated .

Change and update of the privacy policy

We ask you to regularly inform yourself about the content of our privacy policy. We adapt the privacy policy as soon as the changes in the data processing carried out by us make it necessary. We will inform you as soon as the changes require an act of cooperation on your part (e.g. consent) or other individual notification. Insofar as we provide addresses and contact information of companies and organizations in this data protection declaration, we ask you to note that the addresses may change over time and ask you to check the information before contacting us.

Supervisory authority responsible for us:
Bavarian State Office for Data Protection Supervision
Postal address:
P.O. Box 1349
91504 Ansbach

E-mail: poststelle@lda.bayern.de
Homepage: https://www.lda.bayern.de

Definitions of terms

This section provides you with an overview of the terms used in this data protection declaration. If the terms are defined by law, their legal definitions apply. The following explanations, on the other hand, are intended primarily to aid understanding.

- **Personal data:** "Personal data" means any information relating to an identified or identifiable natural person (hereinafter "data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier (e.g. cookie) or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- Profiles with user-related information: The processing of "profiles with user-related information", or "profiles" for short, includes any type of automated processing of personal data that consists of using such personal data to identify certain personal aspects relating to a natural person (depending on the type of profiling, this may include different information concerning demographics, behaviour and interests, such as. e.g., interaction with websites and their content, etc.) to analyse, evaluate or, to predict (e.g., interests in certain content or products, click behaviour on a website or location). Cookies and web beacons are often used for profiling purposes.
- Reach measurement: Reach measurement (also known as web analytics) is used to evaluate the flow of
 visitors to an online offering and may include visitors' behaviour or interests in certain information, such





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as content on web pages. With the help of reach analysis, operators of online offers can, for example, recognize at what time users visit their websites and what content they are interested in. This enables them, for example, to better adapt the content of their websites to the needs of their visitors. For reach analysis purposes, pseudonymous cookies and web beacons are often used to recognize returning visitors and thus obtain more precise analyses of the use of an online offer.

- Location data: Location data is generated when a mobile device (or another device with the technical requirements of location determination) connects to a radio cell, a WLAN or similar technical means and functions of location determination. Location data is used to indicate the geographically determinable position on earth at which the respective device is located. Location data can be used, for example, to display map functions or other information dependent on a location.
- **Controller:** "Controller" means the natural or legal person, public authority, agency or other body which alone or jointly with others determines the purposes and means of the processing of personal data.
- **Processing:** "Processing" means any operation or set of operations which is performed upon personal data, whether by automatic means. The term is broad and includes virtually any handling of data, be it collection, evaluation, storage, transmission or deletion.

Cookie overview

Group: Essential

Essential cookies are required for basic functions of the website. This ensures that the website functions properly.

Name

omCookieConsent

Descr.

Saves the user-selected cookie settings.

Lifetime

365 days

Provider

Oliver Pfaff - Olli macht's

Group: Marketing

Marketing cookies include tracking and statistics cookies

Name

_ga, _gid, _gat, __utma, __utmb, __utmc, __utmd, __utmz

Descr.

These cookies are used by Google Analytics to collect various types of usage information, including personal and non-personal information. For more information, please see the Google Analytics privacy policy at https://policies.google.com/privacy. Collected non-personal information is used to generate reports about website usage that help us improve our websites / apps. This information is also shared with our customers / partners.

Lifetime

Several - vary from 2 years to 6 months or even shorter.

Provider

Google LLC

Name

Youtube

Descr.

Used to display YouTube videos and store user settings.

Lifetime

Current browser session

Provider

YouTube